

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

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)

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

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

N/A

RECEIVED
Bureau of Air Quality
& Meteorology
October 2008
0112711-001

POSSIBLE
DENIAL

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. 25th Street

City: Hollywood

County: Broward

Zip Code: 33023

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

13 OCT 08
Date

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.

Survival Products, Inc.'s average daily usage for the past four years (2004 thru 2007) has been 20.4 pounds per day. Survival Products, Inc. expects this usage to remain approximately the same in the future.

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 20 tons per year as specified in 62-210.310(2)(a). This was determined by Survival Products, Inc.'s actual potential for the past four years (2004 thru 2007).

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 the past four years (2004 thru 2007).

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.

5614 S.W. 25th STREET • HOLLYWOOD, FLORIDA 33023

SURVIVOR

PRODUCTS INC.



02 1P
0002681066 OCT 15 2008
MAILED FROM ZIP CODE 33023

\$ 000.42⁰

Florida Department of
Environmental Protection

PO BOX 3070

Tallahassee, FL 32315-3070

32315-3070 8099





30 October 2008

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301

VIA FAX AND MAIL

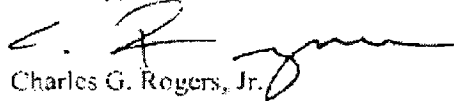
Subject: Air General Permit Eligibility (SPI Letters 17OCT08 & 21SEP08)

Dear Mr. Bittle:

I have not received an answer from you regarding my 17OCT08 and 21SEP08 letters. Your office's Mark Gerberding called me on 21OCT08 and I told him I am appealing the Final Order on the 25SEP08 Hearing. I asked him why I had not heard from you regarding the subject letters and he said you were probably not going to reply to them

If I do not receive an answer from you by 07NOV08, I will assume that you agree with the calculations in my 21SEP08 letter and that SPI is eligible to register for an Air General Permit.

Sincerely,


Charles G. Rogers, Jr.
President

BEFORE THE HEARING EXAMINER FOR THE BROWARD COUNTY
ENVIRONMENTAL PROTECTION AND GROWTH MANAGEMENT DEPARTMENT
IN AND FOR BROWARD COUNTY, FLORIDA

BROWARD COUNTY ENVIRONMENTAL PROTECTION
AND GROWTH MANAGEMENT DEPARTMENT,
Petitioner,

NOV08-0024

vs.

SURVIVAL PRODUCTS, INC.,
Respondent.

FINAL ORDER

THIS MATTER came before the undersigned hearing examiner for the Broward County Environmental Protection and Growth Management Department ("EPGMD") at a hearing held on September 25, 2008 in Fort Lauderdale, Florida. The issue to be determined is whether Respondent, Survival Products, Inc., violated the following provision of Chapter 27 of the Broward County Code in the one count Notice of Violation at issue herein as follows:

1. Count 1: Whether Respondent is operating a source of air pollution without a State of Florida Air Permit in violation of Section 27-175(a) of the Broward County Code.

EPGMD is seeking a civil penalty in the amount of \$8,899.00 against the Respondent and Administrative Costs of \$600.00 for a total of \$9,499.00. EPGMD also requests certain specified corrective action detailed at the end of this Final Order.

Daphne Jones, Esquire of the Broward County Attorney's Office represented the EPGMD and presented the testimony of Cynthia Fernandez, Natural Resource

Specialist II, and Josie Cisneros, Natural Resource Specialist II. Charles G. Rogers, Jr., President of Survival Products, Inc., appeared at the hearing on behalf of Respondent and testified.

FINDINGS OF FACT

1. Respondent, Survival Products, Inc., manufactures survival emergency equipment. The facility uses adhesives containing hazardous air pollutants ("HAPs"), which makes the operation subject to state regulations.
2. On September 19, 2007, the Air Quality Division ("AQD") of the EPGMD conducted an on-site inspection of the facility pursuant to its unpermitted facilities inspection program. EPGMD's Cynthia Fernandez testified that, while on site, several drums of toluene were observed. Ms. Fernandez testified that Respondent's Director of Engineering, David E. Miller, advised that an average of forty (40) drums of toluene are used by the facility every year as well as one drum of glue every month. Ms. Fernandez testified that Mr. Miller provided Material Safety Data Sheets ("MSDS") which reflected the amount of usage for said products. Based upon this information, Ms. Fernandez testified that the EPGMD believed that the facility required a state permit to operate.
3. Ms. Fernandez testified that, on September 25, 2007, the AQD issued a Notification of Potential Enforcement Action letter to Respondent requesting specifically enumerated information that would allow the EPGMD to make a determination as to air permit applicability and whether enforcement action was warranted.

4. On October 31, 2007, Respondent sent a one (1) page letter to the EPGMD wherein it informally addressed the questions asked in the AQD letter of September 25, 2007.
5. EPGMD's Ms. Cisneros testified that, on November 9, 2007, the AQD conducted another site visit wherein EPGMD's Clifton Bittle, Cynthia Fernandez, and Ms. Cisneros, met with Mr. Rogers and walked through the facility. Ms. Cisneros testified that the inspection revealed that a permit is required for the operation of the facility.
6. On November 15, 2007, the AQD issued a letter to Respondent requesting clarification and documentation regarding the operation of the facility as it relates to the use and waste of accelerators, adhesives, toluene and other HAP emissions. Ms. Cisneros testified that Respondent has not submitted the requested information to date.
7. On January 25, 2008, Respondent was issued Warning Notice Number WRN08-0031 by certified mail wherein Respondent was noticed that it was in violation of section 27-175(a) of the Broward County Code insofar as it operating without a State of Florida Air Permit. Respondent was given sixty (60) days to complete and submit to the EPGMD an air permit application (which was attached to the Warning Notice) along with the application fee. The United States Postal Service Track and Confirm search results reflect that the Warning Notice was delivered on February 1, 2008.
8. Ms Cisneros testified that no corrective action was taken by Respondent as required within the sixty (60) day time frame. Accordingly, on May 19, 2008,

Respondent was issued Notice of Violation number NOV08-0024 by certified mail. The return receipt reflects that the Notice of Violation was received on May 27, 2008.

9. Ms. Cisneros testified that Respondent has not submitted an air permit application and application fee to the EPGMD to date. Ms. Cisneros testified that there is a moderate potential for environmental harm for non-compliance based upon the limited information provided by Respondent.
10. Mr. Rogers testified that he believes he is either exempt from the air permit requirements based on 62-210.300(3)(a)15, F.A.C., or that he qualifies for an Air General Permit. With regard to the former, the evidence reflects that the exemption upon which Mr. Rogers relies does not apply to the manufacturer of a safety product. Rather, the exemption is meant to apply to fire suppression systems (i.e. halon, fire extinguishers, etc.) that are installed at a facility. With regard to the latter argument, the evidence suggests that no one is able to ascertain exactly which type of air permit is required because the Respondent has not yet completed the air permit application necessary to make such a determination.
11. Mr. Rogers testified that his letter dated October 31, 2007 provided the information which was requested by the EPGMD with sufficient specificity to enable the AQD to determine what type of permit is required without completion of the air permit application. Mr. Rogers testified that he had done the necessary calculations and that Ms. Cisneros could have done the same

calculations based upon the information he provided to the AQD to arrive at the conclusion that an Air General Permit was required.

CONCLUSIONS OF LAW

The testimony and evidence presented at the hearing were uncontroverted that Respondent uses adhesives containing HAPs in the manufacturing of its survival emergency equipment. The use of such HAPs makes the operation subject to state regulations. Respondent is presently operating without a valid State of Florida Air Permit. The exemption upon which Respondent relies does not apply to the manufacturer of a safety product. The information provided to date by Respondent to the AQD is incomplete, prohibiting determination as to which type of air permit is required for the operation of Respondent's facility. Completion and submission of the air permit application by Respondent is necessary to make such a determination. There is a moderate potential for environmental harm for non-compliance.

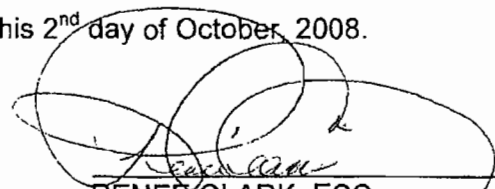
WHEREFORE, it is hereby ORDERED AND ADJUDGED that:

Respondent, Survival Products, Inc., did violate Chapter 27 of the Broward County Code as set forth in Count 1 and shall pay a civil penalty of \$8,899.00 plus administrative costs of \$600.00. This amounts to a total sum due and owing of \$9,499.00. In addition, the following corrective action shall be imposed in this case:

Within thirty (30) days from the rendition of this Final Order, Respondent shall submit a completed State of Florida Air Permit Application (Application for Air

Permit – Long Form, DEP Form No. 62-210.900(1) that is acceptable to the Department.

DONE AND ORDERED on this 2nd day of October, 2008.


RENEE CLARK, ESQ.
HEARING EXAMINER

Copies Furnished to:

Daphne Jones, Assistant County Attorney
Charles G. Rogers, Jr., President of Survival Products, Inc., Respondent
John Stagnari, EPD Enforcement Administrator

RECEIVED
OCT -7 2008
EPD-ENFORCEMENT

11/9/07 Survival Products, Inc.

(Site Visit)
C. Fernandez

- ① Purchases of gallons per month. J. Cisneros
- ② 5 gal accelerator }
per 150 gallons ~~accelerant~~ adhesive } monthly.
C. Bittle
Mr. Charles Rogers
- 5 gal pail of adhesive.

③ ^{some} Waste is 55 gal drums
xistoluene w/ adhesive mixed

④ Toluene activates adhesive * Noted many ^{new} 55 gal
drums of toluene on site

Neoprene coated nylon is raw material
Continuous process / constant business.

3 coats of cement which is allowed
to dry - the seam is only coated

Sizes 4-12 person size rafts

Seams are brushed on

Hours 7am - 3:30pm M-F; no peak times or seasons

3 coats of cement: 30 gallons adhesive to

1 gallon accelerator

done in 5 gal / day pail

1 coat / hr. to 3 coats. dry for 1

Brushed coats

Activate w/ toluene rag

Scrape w/ paddle to get air bubbles out

75% ^{private} aviation / 25% marine (D)

Received at FILE
STW
4/9/07

ASHLAND

08/09/2007

SURVIVAL PRODUCTS INC
MSDS CONTACT MSDS CONTACT
5614 SW 25TH ST
HOLLYWOOD FL 33023
US

ATTN:MSDS COORDINATOR

Ashland provides its customers with a Material Safety Data Sheet (MSDS) the first time a product is purchased or sampled for testing. In some cases, an MSDS is distributed on an annual basis to comply with specific regulatory requirements even if there has been no revision. If the MSDS is significantly changed, a copy of the revised sheet is sent to customers who purchased the product in the previous twelve months.

The Material Safety Data Sheet is addressed to the attention of the MSDS COORDINATOR and is sent according to the contact information that Ashland has on file for your organization. You should direct the Material Safety Data Sheet to those responsible for managing or designing operations involving the use of the product and those who use or handle the product and may potentially be exposed to it.

Ashland is committed to providing accurate health and safety information on the products that we manufacture or distribute. We appreciate your continued business.

If you have any further questions or concerns, please feel free to contact us.

US and Canada: 1-800-325-3751
All others: 614-790-4612

TOLUENE 20054

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Ashland	Regulatory Information Number	1-800-325-3751
P.O. Box 2219	Telephone	614-790-3333
Columbus, OH 43216	Emergency telephone number	1-800-ASHLAND (1-800-274-5263)

Product name	TOLUENE
Product code	20054
Product Use Description	SOLVENT

2. HAZARDS IDENTIFICATION

Emergency Overview

Appearance: liquid,, colourless

WARNING! FLAMMABLE LIQUID AND VAPOR. MAY AFFECT THE CENTRAL NERVOUS SYSTEM CAUSING DIZZINESS, HEADACHE OR NAUSEA. HARMFUL IF INHALED. MAY BE HARMFUL IF INHALED OR SWALLOWED. MAY CAUSE EYE IRRITATION. PROLONGED OR REPEATED CONTACT MAY DRY THE SKIN AND CAUSE IRRITATION AND BURNS. PROLONGED OR REPEATED CONTACT MAY DRY SKIN AND CAUSE IRRITATION.

Potential Health Effects

Routes of Exposure

Inhalation, Skin absorption, Skin contact, Eye Contact, Ingestion

Eye Contact

Can cause eye irritation. Symptoms include stinging, tearing, redness, and swelling of eyes.

Skin Contact

May cause mild skin irritation. Prolonged or repeated contact may dry the skin. Symptoms may include redness, burning, drying and cracking of skin, and skin burns. Passage of this material into the body through the skin is possible, but it is unlikely that this would result in harmful effects during safe handling and use.

Ingestion

TOLUENE 20054

Swallowing small amounts of this material during normal handling is not likely to cause harmful effects. Swallowing large amounts may be harmful. This material can get into the lungs during swallowing or vomiting. This results in lung inflammation and other lung injury.

Inhalation

Breathing of vapor or mist is possible. Breathing small amounts of this material during normal handling is not likely to cause harmful effects. Breathing large amounts may be harmful. Symptoms are not expected at air concentrations below the recommended exposure limits, if applicable (see Section 8.).

Aggravated Medical Condition

Preexisting disorders of the following organs (or organ systems) may be aggravated by exposure to this material: respiratory tract, skin, lung (for example, asthma-like conditions), kidney, central nervous system, auditory system, Individuals with preexisting heart disorders maybe more susceptible to arrhythmias (irregular heartbeats) if exposed to high concentrations of this material.

Symptoms

Signs and symptoms of exposure to this material through breathing, swallowing, and/or passage of the material through the skin may include: metallic taste, stomach or intestinal upset (nausea, vomiting, diarrhea), irritation (nose, throat, airways), central nervous system excitation (giddiness, liveliness, light-headed feeling) followed by central nervous system depression (dizziness, drowsiness, weakness, fatigue, nausea, headache, unconsciousness) and other central nervous system effects, temporary changes in mood and behavior, muscle weakness, loss of coordination, confusion, irregular heartbeat, coma, and death

Target Organs

Prolonged intentional toluene abuse may lead to damage to many organ systems having effects on: central and peripheral nervous systems, vision, hearing, liver, kidneys, heart and blood. Such abuse has been associated with brain damage characterized by disturbances in gait, personality changes and loss of memory. Comparable central nervous system effects have not been shown to result from occupational exposure to toluene., Prolonged intentional toluene abuse may lead to hearing loss progressing to deafness. In addition, while noise is known to cause hearing loss in humans, it has been suggested that workers exposed to organic solvents, including toluene, along with noise may suffer greater hearing loss than would be expected from exposure to noise alone., Overexposure to this material (or its components) has been suggested as a cause of the following effects in laboratory animals: mild, reversible liver effects, mild, reversible kidney effects, respiratory tract damage (nose, throat, and airways), effects on hearing,

TOLUENE 20054

central nervous system damage, Overexposure to this material (or its components) has been suggested as a cause of the following effects in humans:, kidney damage

Carcinogenicity

This material is not expected to cause cancer in humans since it did not cause cancer in laboratory animals. This material is not listed as a carcinogen by the International Agency for Research on Cancer (IARC), the National Toxicology Program (NTP), or the Occupational Safety and Health Administration (OSHA).

Reproductive Hazard

Toluene may be harmful to the human fetus based on positive test results with laboratory animals. Case studies show that prolonged intentional abuse of toluene during pregnancy can cause birth defects in humans.

Other Information

No data

3. COMPOSITION/INFORMATION ON INGREDIENTS

Components	CAS-No.	Concentration
TOLUENE	108-88-3	>=90-<=100%

4. FIRST AID MEASURES

Eyes

If symptoms develop, immediately move individual away from exposure and into fresh air. Flush eyes gently with water for at least 15 minutes while holding eyelids apart; seek immediate medical attention.

Skin

Remove contaminated clothing. Wash exposed area with soap and water. If symptoms persist, seek medical attention. Launder clothing before reuse.

Ingestion

Seek medical attention. If individual is drowsy or unconscious, do not give anything by mouth; place individual on the left side with the head down. Contact a physician, medical facility, or poison control center for advice about whether to induce vomiting. If possible, do not leave individual unattended.

Inhalation

TOLUENE 20054

If symptoms develop, move individual away from exposure and into fresh air. If symptoms persist, seek medical attention. If breathing is difficult, administer oxygen. Keep person warm and quiet; seek immediate medical attention.

Notes to Physician

Hazards: Inhalation of high concentrations of this material, as could occur in enclosed spaces or during deliberate abuse, may be associated with cardiac arrhythmias. Sympathomimetic drugs may initiate cardiac arrhythmias in persons exposed to this material. This material is an aspiration hazard. Potential danger from aspiration must be weighed against possible oral toxicity (See Section 2 - Swallowing) when deciding whether to induce vomiting.

Treatment: No information available.

5. FIRE-FIGHTING MEASURES

Suitable Extinguishing Media

foam, carbon dioxide (CO₂), dry chemical

Hazardous Combustion Products

May form: carbon dioxide and carbon monoxide, various hydrocarbons

Precautions for Fire-Fighting

Material is volatile and readily gives off vapors which may travel along the ground or be moved by ventilation and ignited by pilot lights, flames, sparks, heaters, smoking, electric motors, static discharge or other ignition sources at locations near the material handling point. Wear full firefighting turn-out gear (full Bunker gear), and respiratory protection (SCBA). Use water spray to cool fire exposed containers and structures until fire is out if it can be done with minimal risk. Avoid spreading burning liquid with water used for cooling purposes.

Flammability Class for Flammable Liquids

Flammable Liquid Class IB Flammable Liquid Class IB

6. ACCIDENTAL RELEASE MEASURES

Personal Precautions

For personal protection see section 8. Eliminate all ignition sources (flares, flames including pilot lights, electrical sparks). Persons not wearing protective equipment should be excluded from area of spill until clean-up has been completed. Stop spill at source. Prevent from entering drains, sewers, streams or other bodies of water. Prevent

TOLUENE 20054

from spreading. If runoff occurs, notify authorities as required. Pump or vacuum transfer spilled product to clean containers for recovery. Absorb unrecoverable product. Transfer contaminated absorbent, soil and other materials to containers for disposal.

Environmental Precautions

Prevent run-off to sewers, streams or other bodies of water. If run-off occurs, notify proper authorities as required, that a spill has occurred.

Methods for Cleaning Up

Absorb liquid on vermiculite, floor absorbent or other absorbent material.

7. HANDLING AND STORAGE

Handling

Containers of this material may be hazardous when emptied. Since emptied containers retain product residues (vapor, liquid, and/or solid), all hazard precautions given in the data sheet must be observed. Static ignition hazard can result from handling and use. Electrically bond and ground all containers, personnel and equipment before transfer or use of material. Special precautions may be necessary to dissipate static electricity for non-conductive containers. Use proper bonding and grounding during product transfer as described in National Fire Protection Association document NFPA 77.

Storage

Store in a cool, dry, ventilated area away from sources of heat, moisture, and incompatible substances. Store out of direct sunlight.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

Exposure Guidelines

TOLUENE		108-88-3
ACGIH	time weighted average	20 ppm
NIOSH	Recommended exposure limit (REL):	100 ppm
NIOSH	Recommended exposure limit (REL):	375 mg/m ³
NIOSH	Short term exposure limit	150 ppm
NIOSH	Short term exposure limit	560 mg/m ³
OSHA Z2	time weighted average	200 ppm
OSHA Z2	Ceiling Limit Value:	300 ppm
OSHA Z2	Maximum concentration:	500 ppm

TOLUENE 20054

General Advice

These recommendations provide general guidance for handling this product. Personal protective equipment should be selected for individual applications and should consider factors which affect exposure potential, such as handling practices, chemical concentrations and ventilation. It is ultimately the responsibility of the employer to follow regulatory guidelines established by local authorities.

Exposure Controls

Provide sufficient mechanical (general and/or local exhaust) ventilation to maintain exposure below TLV(s). Explosion-proof ventilation system is acceptable.

Eye Protection

Chemical splash goggles in compliance with OSHA regulations are advised; however, OSHA regulations also permit other type safety glasses. Consult your safety representative.

Skin and Body Protection

To prevent repeated or prolonged skin contact, wear impervious clothing and boots. Wear resistant gloves such as: polyvinyl alcohol

Respiratory Protection

If workplace exposure limit(s) of product or any component is exceeded (see exposure guidelines), a NIOSH-approved air supplied respirator is advised in absence of proper environmental control. OSHA regulations also permit other NIOSH respirators (negative pressure type) under specified conditions (see your industrial hygienist). Engineering or administrative controls should be implemented to reduce exposure.

9. PHYSICAL AND CHEMICAL PROPERTIES

Physical state	liquid
Form	Liquid,
Colour	colourless
Odour	hydrocarbon-like
Boiling point/range	231.1 °F / 110.6 °C
Melting point/range	-138.8 °F / -94.9 °C
pH	No data
Flash point	39.99 °F / 4.44 °C Closed Cup
Evaporation rate	2.00 (N-Butyl Acetate)
Explosion limits	1.27 %(V) 7 %(V)
Vapour pressure	3.786288 kPa @ 77 °F / 25 °C
Vapour density	3.1

TOLUENE 20054

Density	0.87 g/cm ³ @ 68.00 °F / 20.00 °C 7.25 lb/gal @ 68 °F / 20 °C
Solubility	negligible in water
Partition coefficient (n-octanol/water)	No data
Autoignition temperature	896 °F / 480 °C

10. STABILITY AND REACTIVITY

Stability

Stable.

Conditions to Avoid

Avoid contact with:

Incompatible Products

Avoid contact with:, strong acids, strong oxidizing agents

Hazardous Decomposition Products

May form:, carbon dioxide and carbon monoxide, various hydrocarbons

Hazardous Reactions

Product will not undergo hazardous polymerization.

Thermal Decomposition

No data

11. TOXICOLOGICAL INFORMATION

Acute Oral Toxicity

TOLUENE

LD 50 Rat: 2,600 - 7,500 mg/kg
LD 50 Rat: 5,000 mg/kg

Acute Inhalation Toxicity

TOLUENE

LC 50 Rat: 8000 ppm, 4 h

Acute Dermal Toxicity

TOLUENE 20054

TOLUENE

LD 50 Rabbit: 12,124 mg/kg

12. ECOLOGICAL INFORMATION

Aquatic Toxicity

Acute and Prolonged Toxicity to Fish

No data

Acute Toxicity to Aquatic Invertebrates

No data

Environmental Fate and Pathways

No data

13. DISPOSAL CONSIDERATIONS

Waste Disposal Methods Destroy by incineration in accordance with applicable regulations. For assistance with your waste management needs - including disposal, recycling and waste stream reduction, contact Ashland Distribution's Environmental Services Group at 800-637-7922.

14. TRANSPORT INFORMATION

IMDG:

UN1294, TOLUENE 3, II

IATA_P:

UN1294, Toluene 3, II

IATA_C:

UN1294, Toluene 3, II

CFR_ROAD:

UN1294, Toluene 3, II

CFR_RAIL:

UN1294, Toluene 3, II

CFR_INWTR:

UN1294, Toluene 3, II

IMDG_INWTR:

UN1294, TOLUENE 3, II

IMDG_ROAD:

UN1294, TOLUENE 3, II

TOLUENE 20054

IMDG_RAIL:
UN1294, TOLUENE 3, II

Dangerous goods descriptions (if indicated above) may not reflect package size, quantity, end-use or region-specific exceptions that can be applied. Consult shipping documents for descriptions that are specific to the shipment.

15. REGULATORY INFORMATION

California Prop. 65

WARNING! This product contains a chemical known in the State of California to cause cancer.

BENZENE

WARNING! This product contains a chemical known in the State of California to cause birth defects or other reproductive harm.

TOLUENE

BENZENE

Additional Regulations

US. Toxic Substances Control Act (TSCA) Section 8(d) Health & Safety Data Reporting (40 CFR 716, Subpt B)

US. Toxic Substances Control Act (TSCA) Section 8(d) Health & Safety Data Reporting (40 CFR 716, Subpt B)

US. Toxic Substances Control Act (TSCA) Section 8(d) Health & Safety Data Reporting (40 CFR 716, Subpt B)

US. OSHA Hazard Communication Standard: On One of the Floor Lists of the OSHA HCS (29 CFR 1910.1200).

US. High Production Volume Chemicals

US. Toxic Substances Control Act (TSCA) Section 4 - Master Testing List

US. Drug Enforcement Administration (DEA) Listed Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2))

US. Drug Enforcement Administration (DEA) Listed Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2))

US. Drug Enforcement Administration (DEA) Listed Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2))

US. Drug Enforcement Administration (DEA) Listed Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2))

MATERIAL SAFETY DATA SHEET
FA1013 MIL-A-5540B Class 4 & 5

Received at site
11/9/07

MANUFACTURER'S NAME:
CLIFTON ADHESIVE, INC.
BURGESS PLACE
WAYNE, N.J. 07470

INFORMATION AND EMERGENCY
PHONE NUMBER: 973-694-0845

IN CASE OF SPILL OR LEAK INVOLVING
THIS MATERIAL-CALL CHEMTREC 24
HOURS A DAY AT 800-424-9300

DATE OF PREPARATION: 08-16-06

DOT NAME & NO.:

ADHESIVES, UN1133

SECTION I - PRODUCT IDENTIFICATION

PRODUCT NAME: FA1013 MIL-A-5540B Class 4 & 5
HMIS RATINGS: H F R PP
2 3 0 B

SECTION II - HAZARDOUS INGREDIENTS

THE FOLLOWING * ARE REPORTABLE UNDER SARA TITLE III-SECTION 313:

TOP FIVE AND/OR HAZARDOUS INGREDIENTS:	CAS NUMBER	ACGIH TLV	OSHA PEL
Toluene 41-46%	*108-88-3	50	100
Hexane 29-34%	*110-54-3	50	50
TSR # 1397250002-5294P			
TSR # 1397250002-5027P			
TSR # 1397250002-5273P			
TSR # 1397250002-5155P			

** Above exposure limits are for air levels only. When skin contact occurs over exposure may result though air levels are less than limits listed above.

SECTION III - PHYSICAL DATA

BOILING Point: 149 DEG.F VAPOR DENSITY: 3.10
VAPOR PRESSURE (mm Hg @ TEMP): 71.68 at 20 deg C. or 68 F.
SPECIFIC GRAVITY: 0.86 WEIGHT/GAL: 7.18
APPEARANCE AND ODOR: Opaque Neutral. Characteristic solvent odor.
VOLATILE ORGANIC COMPOUND #/GAL.: 5.29
VOLATILE ORGANIC COMPOUND KG/LITER: 0.63

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: -10 DEG. F METHOD USED: TCC
FLAMMABLE LIMITS IN AIR % LEL 1.0 UEL 7.5
AUTO IGNITION TEMPERATURE: 510 DEG.F
EXTINGUISH MEDIA: CO 2, Foam, and dry chemical.
SPECIAL FIRE FIGHTING PROCEDURE:

MATERIAL SAFETY DATA SHEET
FA1013 MIL-A-5540B Class 4 & 5

NIOSH/MSHA-approved self-contained breathing apparatus should be worn. Use water spray to cool fire-exposed structures and disperse vapor cloud if fire is not present.

UNUSUAL FIRE AND EXPLOSION HAZARD:

Vapor is heavier than air and may travel considerable distance to a source of ignition and flashback.

=====
SECTION V - REACTIVITY DATA
=====

STABILITY: Stable.

INCOMPATIBILITY (MATERIALS TO AVOID);

N/A

CONDITIONS TO AVOID:

Avoid heat, open flames, sparks, hot surfaces and oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS:

Oxides of carbon, zinc, magnesium, sulfur. Hydrogen chloride
Hydrogen sulfide.

HAZARDOUS POLYMERIZATION: Will not occur.

=====
SECTION VI - HEALTH HAZARD DATA
=====

EFFECTS OF OVEREXPOSURE:

ACUTE: Nausea and/or narcosis.

CHRONIC: May cause nerve damage.

TARGET ORGANS: Toluene, based on animal data, may cause liver abnormalities, kidney, lung & spleen damage. In humans liver abnormalities.

Hexane may cause central nervous system effects or damage peripheral nerve tissue.

SIGNS AND SYMPTOMS OF EXPOSURE:

Irritation to eyes and mucous membranes. Dry and cracked skin. Liquid ingestion may result in vomiting. Numbness, tingling and weakness of arms or legs.

CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE:

Respiratory ailments.

CARCINOGENICITY No

WARNING: This product contains a chemical known to the State of California to cause cancer, birth defects and/or reproductive harm.

PRIMARY ROUTE(S) OF ENTRY: Inhalation, eyes, skin ingestion.

EMERGENCY AND FIRST AID PROCEDURES:

Utilize the suggested methods listed below. In emergency situations notify a physician immediately.

SKIN: Wash with soap and water. Refer to physician if irritation persists.

EYES: Flush eyes abundantly with clean water and refer to physician.

INGESTION: DO NOT induce vomiting. Refer to physician.

EXCESSIVE INHALATION: Remove patient to fresh air or give oxygen. Use CPR if patient is not breathing. Refer to physician.

=====
SECTION VII - SPECIAL PRECAUTIONS
=====

MATERIAL SAFETY DATA SHEET
FA1013 MIL-A-5540B Class 4 & 5

HANDLING & STORAGE:

Keep containers tightly closed and store in approved solvent storage area. Keep away from open flame, heat sparks, hot surfaces and oxidizing agents.

OTHER PRECAUTIONS: N/A

SECTION VIII - SPILL OR LEAK PROCEDURES

FOR SPILLS OR RELEASED MATERIAL:

Absorb spill in sand, earth, vermiculite, or other absorbent material. Shovel absorbed material into steel container and cover.

WASTE DISPOSAL METHOD:

Dispose in accordance with federal, state, and local chemical and solvent waste disposal regulations.

SECTION IX - SAFE HANDLING AND USE INFORMATION

RESPIRATORY PROTECTION:

Use NIOSH-approved atmosphere supplying or air purifying respirator for organic vapors as required to maintain exposure levels below recommended limits.

VENTILATION: As specified.

LOCAL EXHAUST: Remove vapors during processing.

MECHANICAL EXHAUST: Explosion-proof equipment.

SPECIAL: Reduce vapor concentrations below specified limits.

PROTECTIVE GLOVES: PVA Gloves

EYE PROTECTION: Safety Glasses.

OTHER PROTECTIVE EQUIPMENT:

Protective clothing as required to prevent skin contact.

HYGIENIC PRACTICES:

Keep area clean. Clean up spills immediately. Practice good personal hygiene.

DISCLAIMER LIABILITY: Since conditions or methods of use are beyond our control - we do not assume any responsibility and expressly disclaim any liability for any use of this product. The information contained in this MSDS is believed to be true and accurate but all statements or suggestions are made without warranty - express or implied regarding the accuracy of the information - the hazards connected with the use of the product or the results to be obtained from the use thereof. Compliance with all federal state and local laws and regulations remains the responsibility of the user.

USER'S RESPONSIBILITY: This MSDS cannot cover all possible situations which the user may experience during processing. You should examine each aspect of your operation and determine if additional precautions should be taken. All health and safety information contained in this MSDS should be provided to your employees or customers. It is your responsibility to use this information to develop appropriate work practice guidelines and employee training programs for your operation.

MATERIAL SAFETY DATA SHEET
ACC1013

Received at site
11/9/07

MANUFACTURER'S NAME:
Clifton Adhesive, Inc.
Burgess Place
Wayne, N.J. 07470

INFORMATION AND EMERGENCY
PHONE NUMBER: 973-694-0845

IN CASE OF SPILL OR LEAK INVOLVING
THIS MATERIAL-CALL CHEMTREC 24
HOURS A DAY AT 800-424-9300

DATE OF PREPARATION: 12-11-06

DOT NAME & NO.:

FLAMMABLE
LIQUIDS, N.O.S.
(METHANOL), UN1993

SECTION I - PRODUCT IDENTIFICATION

PRODUCT NAME: ACC1013

HMIS RATINGS: H F R PP
2 3 0 B

SECTION II - HAZARDOUS INGREDIENTS

THE FOLLOWING * ARE REPORTABLE UNDER SARA TITLE III-SECTION 313:

TOP FIVE AND/OR

HAZARDOUS INGREDIENTS:

CAS NUMBER

ACGIH
TLV

OSHA PEL

Methanol 74-79%
TSR # 1397250002-5467P

*67-56-1

200

200

Above exposure limits are for air levels only. When skin contact occurs, overexposure may result though air levels are less than limits listed above.

SECTION III - PHYSICAL DATA

BOILING Point: 138 - 158 deg F.

VAPOR DENSITY: 0.91 - 1.31

VAPOR PRESSURE (mm Hg @ TEMP): 95 - 101 @ 20 deg C./ 68 deg F.

SPECIFIC GRAVITY: 0.83 - 0.87

WEIGHT/GAL: 6.91 - 7.31

APPEARANCE AND ODOR: Neutral Liquid. Characteristic solvent odor.

VOLATILE ORGANIC COMPOUND #/GAL.: 5.25 - 5.55

VOLATILE ORGANIC COMPOUND KG/LITER: 0.63 - 0.67

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: 54 Deg. F.

METHOD USED: T.C.C.

FLAMMABLE LIMITS IN AIR % LEL 6.0

UEL 36.0

AUTO IGNITION TEMPERATURE: 725 Deg. F.

EXTINGUISH MEDIA: Co 2, foam, dry chemical

SPECIAL FIRE FIGHTING PROCEDURE:

NIOSH/MSHA -approved self-contained breathing apparatus should be worn. Use water spray to cool fire exposed structures and disperse vapor cloud if fire is not present.

UNUSUAL FIRE AND EXPLOSION HAZARD:

MATERIAL SAFETY DATA SHEET

ACC1013

Vapor is heavier than air and may travel considerable distance to source of ignition and flashback.

=====
SECTION V - REACTIVITY DATA
=====

STABILITY: Stable

INCOMPATIBILITY (MATERIALS TO AVOID);

N/A

CONDITIONS TO AVOID:

Avoid strong acids, heat, open flames, sparks, hot surfaces, and oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS:

Oxides of carbon. Nitrogen.

HAZARDOUS POLYMERIZATION: Will not occur.

=====
SECTION VI - HEALTH HAZARD DATA
=====

EFFECTS OF OVEREXPOSURE:

ACUTE: Nausea and/or narcosis.

CHRONIC: N/A

TARGET ORGANS: Methanol-may cause liver, kidney, eye, lung, spleen, brain or nervous system damage, based on animal data.

SIGNS AND SYMPTOMS OF EXPOSURE:

Irritation to eyes and mucous membranes. Dryness and cracking of skin. Liquid ingestion may cause vomiting.

CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE:

Respiratory ailments and liver ailments.

CARCINOGENICITY No

PRIMARY ROUTE(S) OF ENTRY: Inhalation, Eyes, Skin, Ingestion.

EMERGENCY AND FIRST AID PROCEDURES:

Utilize the suggested methods below. In emergency situations notify a physician immediately.

SKIN: Wash with soap and water. Get medical attention.

EYES: Flush eyes abundently with clean water and refer to physician.

INGESTION: DO NOT induce vomiting. Refer to physician.

EXCESSIVE INHALATION: Remove patient to fresh air or give oxygen. Use CPR if patient is not breathing. Refer to physician.

=====
SECTION VII - SPECIAL PRECAUTIONS
=====

HANDLING & STORAGE:

Store in approved solvent storage area. Keep tightly closed. Keep away from heat open flames, sparks, hot surfaces and oxidizing agents.

OTHER PRECAUTIONS: N/A

=====
SECTION VIII - SPILL OR LEAK PROCEDURES
=====

MATERIAL SAFETY DATA SHEET

ACC1013

FOR SPILLS OR RELEASED MATERIAL:

Absorb spill in sand, earth, vermiculite, or other absorbent material. Shovel absorbed material into steel container and cover.

WASTE DISPOSAL METHOD:

Dispose of in accordance with federal, state, and local chemical and solvent waste disposal regulations.

=====
SECTION IX - SAFE HANDLING AND USE INFORMATION
=====

RESPIRATORY PROTECTION:

Use NIOSH-approved atmosphere supplying or air purifying respirator for organic vapors as required to maintain exposure levels below recommended limits.

VENTILATION: As specified.

LOCAL EXHAUST: Remove vapors during processing.

MECHANICAL EXHAUST: Explosion-proof equipment.

SPECIAL: Reduce vapor concentrations below specified limits.

PROTECTIVE GLOVES: PVA gloves

EYE PROTECTION: Goggles

OTHER PROTECTIVE EQUIPMENT:

Protective clothing as required to prevent skin contact.

HYGIENIC PRACTICES:

Keep area clean. Clean up spills immediately. Practice good personal hygiene.

=====
DISCLAIMER LIABILITY: Since conditions or methods of use are beyond our control - we do not assume any responsibility and expressly disclaim any liability for any use of this product. The information contained in this MSDS is believed to be true and accurate but all statements or suggestions are made without warranty - express or implied regarding the accuracy of the information - the hazards connected with the use of the product or the results to be obtained from the use thereof. Compliance with all federal state and local laws and regulations remains the responsibility of the user.

USER'S RESPONSIBILITY: This MSDS cannot cover all possible situations which the user may experience during processing. You should examine each aspect of your operation and determine if additional precautions should be taken. All health and safety information contained in this MSDS should be provided to your employees or customers. It is your responsibility to use this information to develop appropriate work practice guidelines and employee training programs for your operation.

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301



31 October 2007

Subject: Your 25SEP07 Letter

Dear Mr. Bittle:

The following is in response to your 25SEP07 letter and corresponds to the item numbers listed.

1. Survival Products, Inc.(SPI) manufactures emergency life rafts for aviation and marine use. These rafts are constructed of neoprene coated nylon fabric cemented together with neoprene adhesive. The adhesive is thinned and activated using toluene and accelerator.

SPI has been in business over 37 years with most of it at this location. Twenty employees work at this Hollywood address who along with their families depend on their livelihood from their work here. SPI exports a large number of rafts thus favorably affecting the U.S. Export/Import Ratio.

2. Monthly adhesive/accelerator USG purchases are as follows: JUL07(156/5), MAY07(159/5), JAN07(163/5), NOV06(158/5), SEP06(159/5), AUG06(160/0), MAY06(53/0), APR06(106/0), FEB06(106/5), OCT05(108/10), AUG05(107/5), UN05(110/5),MAY05(110/5),APR05(110/0), MAR05(110/0), FEB05(110/10), NOV04(110/5), OCT04(110/0), AUG04(110/5), JUL04(110/5), MAY04(110/0), MAR04(55/0)

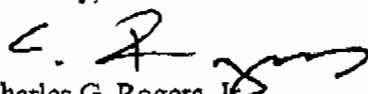
Monthly toluene USG purchases are as follows: OCT07(10), AUG07(10), MAY07(10), FEB07(10), OCT06(9), JUL06(10), APR06(10), NOV05(10), JUL05(10), APR05(10), NOV04(10), SEP04(10), MAY04(10), FEB04(10)

Monthly waste toluene/adhesive/accelerator disposal is as follows: OCT07(715), AUG07(10), MAY07(10), FEB07(10), OCT06((9), JUL06(10), APR06(10), NOV05(10), JUL05(10), APR05(10), NOV04(10), SEP04(10), MAY04(10), FEB04(10)

3. Material Safety Data Sheets for the adhesive, accelerator, and toluene are on file at SPI for your examination.
4. Most all of the adhesive, accelerator, and toluene are incorporated into the life rafts during during manufacture or disposed of as waste and therefore air pollution is minimal.

I am faxing this letter to you today and will be mailing it tomorrow. Please feel free to request any further information you might require.

Sincerely,


Charles G. Rogers, Jr.

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301



PRODUCTS INC.

2007 NOV -9 PM 3:30 31 October 2007

Subject: Your 25SEP07 Letter

Dear Mr. Bittle:

The following is in response to your 25SEP07 letter and corresponds to the item numbers listed.

1. Survival Products, Inc.(SPI) manufactures emergency life rafts for aviation and marine use. These rafts are constructed of neoprene coated nylon fabric cemented together with neoprene adhesive. The adhesive is thinned and activated using toluene and accelerator.

SPI has been in business over 37 years with most of it at this location. Twenty employees work at this Hollywood address who along with their families depend on their livelihood from their work here. SPI exports a large number of rafts thus favorably affecting the U.S. Export/Import Ratio.

2. Monthly adhesive/accelerator USG purchases are as follows: JUL07(156/5), MAY07(159/5), JAN07(163/5), NOV06(158/5), SEP06(159/5), AUG06(160/0), MAY06(53/0), APR06(106/0), FEB06(106/5), OCT05(108/10), AUG05(107/5), UN05(110/5),MAY05(110/5),APR05(110/0), MAR05(110/0), FEB05(110/10), NOV04(110/5), OCT04(110/0), AUG04(110/5), JUL04(110/5), MAY04(110/0), MAR04(55/0)

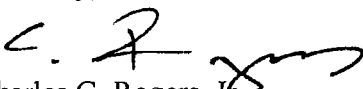
Monthly toluene USG purchases are as follows: OCT07(10), AUG07(10), MAY07(10), FEB07(10), OCT06(9), JUL06(10), APR06(10), NOV05(10), JUL05(10), APR05(10), NOV04(10), SEP04(10), MAY04(10), FEB04(10)

Monthly waste toluene/adhesive/accelerator disposal is as follows: OCT07(715), AUG07(10), MAY07(10), FEB07(10), OCT06((9), JUL06(10), APR06(10), NOV05(10), JUL05(10), APR05(10), NOV04(10), SEP04(10), MAY04(10), FEB04(10)

3. Material Safety Data Sheets for the adhesive, accelerator, and toluene are on file at SPI for your examination.
4. Most all of the adhesive, accelerator, and toluene are incorporated into the life rafts during during manufacture or disposed of as waste and therefore air pollution is minimal.

I am faxing this letter to you today and will be mailing it tomorrow. Please feel free to request any further information you might require.

Sincerely,


Charles G. Rogers, Jr.



ENVIRONMENTAL PROTECTION DEPARTMENT - Air Quality Division
Mailing Address: 115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301
954-519-1220 • FAX 954-519-1495

FAX COVER LETTER

DATE: 10/10/07

TO: Mr. Charlie Rodgers CFO Survival Products,

FAX #: 954-966-3584 FAC

FROM: MS. JOSIE CISNEROS

4 No. of pages including this cover sheet

SUBJECT: Per your request please see attached Chapter 27
Article I, Division 5, section 27-54 and Article IV,
Section 27-176 (a)(3) of the Broward County Code of
Ordinances. To look at Article I and Article IV entirely,
please see our website: <http://www.broward.org/air/>
and select "Regulations" [licensing.htm](#)
If you have any questions, please don't hesitate
to contact me.

Thank You,
Josie, NRST
954-519-1215

DIVISION 5. LICENSES

Sec. 27-50. Scope.

(a) This division provides the general requirements and procedures for the issuance, denial, renewal, extension, transfer, modification, suspension, and revocation of any license required by this chapter. Additional specific requirements may exist in individual sections of this chapter.

(b) EPD is authorized to charge fees for licenses, including extensions, renewals, modifications and for any other approvals which are required pursuant to this chapter, including late fees. Such fees shall be established by resolution of the Board and set forth in the Administrative Code.

(Ord. No. 2003-34, § 1, 9-23-03; Ord. No. 2005-11, § 9, 5-24-05)

Sec. 27-51. Consultation.

Any person may consult with the director concerning the operation, construction, expansion or modification of any facility, the required pollution control devices or system, the efficiency of such devices or system, or the pollution problems related to the facility. A consultation shall not relieve any person from its responsibility for the proper design of the project or facility. Any consultation shall not be construed to relieve any person from meeting the requirements of this chapter.

(Ord. No. 2003-34, § 1, 9-23-03)

Sec. 27-52. Combined EPD/state licenses.

When a State of Florida program is delegated to EPD, a license applicant may receive a combined EPD/state license. Where a delegated program requires EPD to be governed by provisions of the Florida Administrative Code and Florida Statutes generally applicable to the delegated program, those specific portions of the Florida Administrative Code and Florida Statutes required by the delegated program shall apply only to the state provisions of the combined license. EPD portions of the combined license shall be governed by this chapter.

(Ord. No. 2003-34, § 1, 9-23-03; Ord. No. 2005-11, § 9, 5-24-05)

Sec. 27-53. Prohibitions.

Any activity, facility or installation which will reasonably be expected to be a source of pollution shall not be conducted, operated, maintained, constructed, expanded, or modified without the appropriate and valid licenses issued by EPD. EPD may issue a license only after it receives reasonable assurance that the installation will not cause pollution in violation of this chapter. A licensed activity, facility or installation may only be conducted, operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms and conditions of the license.

(Ord. No. 2003-34, § 1, 9-23-03; Ord. No. 2005-11, § 9, 5-24-05)

Sec. 27-54. Licenses required.

Prior to the commencement of construction, modification, alteration, replacement or operation of

any facility or the commencement of any activity that may cause or be a source of pollution, or that may impact, eliminate, reduce or control pollution of the air, ground, groundwaters, surface waters or other natural or biological resources, the owner and/or operator shall obtain a EPD license and pay required fees as established by resolution of the Board. The director may establish, by policy, de minimis development, construction, operation, or alteration activities that either by themselves or in combination with other activities, do not adversely affect the environment or human health. Those activities designated as de minimis do not require a EPD license.

(Ord. No. 2003-34, § 1, 9-23-03; Ord. No. 2005-11, § 9, 5-24-05)

Sec. 27-176. General license and permit requirements; exemptions; application requirements; actions on licenses and permits; and criteria for issuance or denial.**(a) General License and Permit Requirements:**

(1) The owner or operator of any source which emits or can reasonably be expected to emit any air pollutant, shall obtain a valid license from EPD before beginning construction or modification of the source, unless exempted pursuant to this section.

(2) Prior to constructing or modifying a parking facility(ies) as described below, the owner or operator shall obtain a valid license from EPD:

a. Any single-level parking facility(ies) with a design or use capacity of fifteen hundred (1,500) parking spaces or more, or any modification of any existing facility which will increase such parking facility(ies) to a design or use capacity of fifteen hundred (1,500) parking spaces or more;

b. Any multi-level parking facility(ies) with a design or use capacity of seven hundred fifty (750) parking spaces or more, or any modification of any existing facility which will increase such parking facility(ies) to a design or use capacity of seven hundred fifty (750) parking spaces or more;

c. Any combination of a single-level and multi-level parking facility(ies) (combination of parking lots, decks, and garages) with a design capacity or use capacity of at least one thousand (1,000) parking spaces or more, or a modification of any existing facility which will increase such parking facility(ies) to a design or use capacity of one thousand (1,000) parking spaces or more;

d. Any proposed parking facility(ies) with a design of or use capacity of four hundred (400) or more parking spaces that will result in the degradation or exceedance of the NAAQS as determined by EPD. EPD determination shall be based upon the project description, number of parking spaces, and the location of the proposed parking facility(ies), as provided by the license applicant.

(3) Unless exempted pursuant to Rule 62-210.300, F.A.C., or any Florida Statute, the owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from EPD prior to beginning construction, modification, or initial or continued operation of the emissions unit. All emissions limitations, controls, and other requirements imposed by such permits shall be at least as stringent as any applicable limitations and requirements contained in or enforceable under the SIP or that are otherwise federally enforceable. Issuance of a permit does not relieve the owner or operator of an emissions unit from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution regulations or any other such requirements under federal, state, or local law.



ENVIRONMENTAL PROTECTION DEPARTMENT - Air Quality Division
Mailing Address: 115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301
954-519-1220 • FAX 954-519-1495

**NOTIFICATION OF POTENTIAL
ENFORCEMENT ACTION**

September 25, 2007

Survival Products, Inc.
Mr. David Miller, Director of Engineering
5614 SW 25th Street
Hollywood, FL 33023

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Mr. Miller:

The Environmental Protection Department (EPD), Air Quality Division conducted a compliance inspection of your facility on September 19, 2007. We understand that the facility manufactures survival emergency equipment such as life rafts and other. Based on results of the compliance inspection, EPD has grounds to believe and does believe that the facility may be in violation of Chapter 27 of the Broward County Code of Ordinances, Section 27-54 and 27-176(3), for operating without an appropriate air permit.

EPD requests that Survival Products, Inc. provide the following information no later than **October 31, 2007**:

1. An explanation of facility operations including all pollution emitting equipment and disclosure of all coating products used during daily operation.
2. Monthly records of all coatings utilized during manufacturing, finishing and cleaning operations including any and all paints, solvents, thinners, sealers, contact cements, varnishes, adhesives, activators, accelerators, etc., for the past 3 calendar years (2004 to present).
3. Material Safety Data Sheets for all coating products used.
4. Facility potential to emit volatile organic compounds (VOCs) and hazardous air pollutant (HAP) emissions (in tons per year), from all facility operations based on a maximum operating scenario and maximum hours of operation.

Please provide the necessary information by the indicated deadline. Based on the September 19th inspection and the information requested in this letter, EPD will make a determination as to air permit applicability and whether enforcement action is warranted. Should you have any questions, please do not hesitate to contact Ms. Josie Cisneros of the Air Quality Division at 954-519-1220.

Sincerely,

Clifton R. Bittle
Environmental Licensing Manager
Air Quality Division

Broward County Board of County Commissioners

Josephus Eggelletion, Jr. • Sue Gunzburger • Kristin D. Jacobs • Ken Keech • Ilene Lieberman • Stacy Ritter • John E. Rodstrom, Jr. • Diana Wasserman-Rubin • Lois Wexler
www.broward.org

[Company Profile](#)

[Design/Reliability](#)

[Life Rafts](#)

[Survival Kits](#)

[Transmitters](#)

[Safety Equipment](#)

[Rentals](#)

[Service](#)

[Service Stations](#)

[Testimonials](#) New!

[Fax Order Form](#)

[Operator's Manuals](#)

[FAA Documents & Certifications](#)

[Shipping Information](#)

[Summary Price Sheet](#)

[Aviation Links](#)

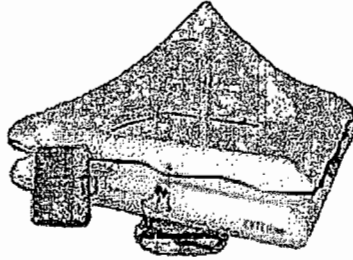
[Marine Links](#) New!

**SURVIVE
WITH
SURVIVAL!!!**



World's Most Compact, Light Weight, and Affordable Life Rafts!

Celebrating 35 Years of Excellence in Aviation & Marine Safety!



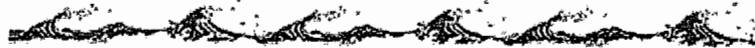
Survival Products, Inc. established in 1970, is a company staffed with personnel having many years of private/commercial/military aviation and marine experience in servicing, engineering, and manufacturing of survival emergency equipment including our complete line of life rafts, vests, slides, etc.

**** FAA Approved Type I & Type II Life Rafts Available! ****

SURVIVAL PRODUCTS, INC.
5614 S.W. 25 STREET, HOLLYWOOD, FL 33023
Phone: (954) 966-7329 Fax: (954) 966-3584

E-mail us at sales@survivalproductsinc.com

[Home](#) | [Company Profile](#) | [Design](#) | [Life Rafts](#) | [Survival Kits](#) | [Transmitters](#) | [Safety Equipment](#) | [Rentals](#) | [Service](#) | [Service Stations](#) | [Testimonials](#) | [Operator's Manuals](#) | [Shipping Info](#) | [Fax Order Form](#) | [Operator's Manuals](#) | [FAA Documents](#) | [Shipping Info](#) | [Summary Price Sheet](#) | [Aviation Links](#) | [Marine Links](#)





Company Profile

Survival Products, Inc. has been in the Aviation and Marine life raft servicing business since 1970. The company is staffed with personnel having many years of private/commercial/military aviation and marine experience in engineering, manufacturing, and servicing of survival emergency equipment including: life rafts, vests, slides, etc. These vast years of experience have made it possible for Survival Products to provide a complete line of the world's most compact, lightweight, and affordable life rafts for your emergency use.



Charles G. Rogers, Jr. (President), who started the business, graduated from the University of Miami in 1960 with a degree in Mechanical Engineering. Rogers went from challenge to challenge and completed many projects for Chrysler, Ford Motor Co., and Heico Corp. He also worked for aircraft firms, such as Riley Aeronautics, Modern Air, and Pan Am, where he spent many years involved in structures, power plants, and systems projects.

In 1970, Rogers started his own engineering consulting business out of his own home. In 1972, he bought the warehouse at 5614 S.W. 25th Street which his company still occupies. With the help of his wife, Donna Rogers (V.P./Marketing), and a small staff, they developed and produced the world's most compact, lightest, and most affordable life rafts for the private aviation and marine markets. Since then, Survival Products, Inc has developed FAA TSO



C70a Type I and Type II rafts for commercial use and the MAC/ORC raft for Offshore racing. Survival Products is continuing to create various products to satisfy and meet all aspects of the aviation and marine markets, for the commercial and private sectors.

The company's wide variety of safety products enables it to fulfill the needs of the global aviation and marine markets. Rogers says, "We are in business to satisfy and meet the customers' needs and our long-term success is due to common sense, hard work, perseverance, expertise in our field, and extreme dedication to its customers and employees."

[Home](#) | [Company Profile](#) | [Design](#) | [Life Rafts](#) | [Survival Kits](#) | [Transmitters](#) | [Safety Equipment](#) | [Rentals](#) | [Service](#)
| [Service Stations](#) | [Testimonials](#) | [Operator's Manuals](#) | [Shipping Info](#) | [Fax Order Form](#) | [Operator's Manuals](#) |
[FAA Documents](#) | [Shipping Info](#) | [Summary Price Sheet](#) | [Aviation Links](#) | [Marine Links](#)

MATERIAL SAFETY DATA SHEET
ACC1013

*5 Ineq
- oxing
3g concd
accelerative*

MANUFACTURER'S NAME:
Clifton Adhesive, Inc.
Burgess Place
Wayne, N.J. 07470

INFORMATION AND EMERGENCY
PHONE NUMBER: 973-694-0845

IN CASE OF SPILL OR LEAK INVOLVING
THIS MATERIAL-CALL CHEMTREC 24
HOURS A DAY AT 800-424-9300

DATE OF PREPARATION: 12-11-06

DOT NAME & NO.:

FLAMMABLE
LIQUIDS, N.O.S.
(METHANOL), UN1993

SECTION I - PRODUCT IDENTIFICATION

PRODUCT NAME: ACC1013

HMIS RATINGS: H F R PP
 2 3 0 B

SECTION II - HAZARDOUS INGREDIENTS

THE FOLLOWING * ARE REPORTABLE UNDER SARA TITLE III-SECTION 313:

TOP FIVE AND/OR

HAZARDOUS INGREDIENTS:

CAS NUMBER

ACGIH
TLV

OSHA PEL

Methanol 74-79%
TSR # 1397250002-5467P

*67-56-1

200

200

Above exposure limits are for air levels only. When skin contact occurs, overexposure may result though air levels are less than limits listed above.

SECTION III - PHYSICAL DATA

BOILING Point: 138 - 158 deg F.

VAPOR DENSITY: 0.91 - 1.31

VAPOR PRESSURE (mm Hg @ TEMP): 95 - 101 @ 20 deg C./ 68 deg F.

SPECIFIC GRAVITY: 0.83 - 0.87

WEIGHT/GAL: 6.91 - 7.31

APPEARANCE AND ODOR: Neutral Liquid. Characteristic solvent odor.

VOLATILE ORGANIC COMPOUND #/GAL.: 5.25 - 5.55

VOLATILE ORGANIC COMPOUND KG/LITER: 0.63 - 0.67

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: 54 Deg. F.

METHOD USED: T.C.C.

FLAMMABLE LIMITS IN AIR % LEL 6.0

UEL 36.0

AUTO IGNITION TEMPERATURE: 725 Deg. F.

EXTINGUISH MEDIA: Co 2, foam, dry chemical

SPECIAL FIRE FIGHTING PROCEDURE:

NIOSH/MSHA -approved self-contained breathing apparatus should be worn. Use water spray to cool fire exposed structures and disperse vapor cloud if fire is not present.

UNUSUAL FIRE AND EXPLOSION HAZARD:

MATERIAL SAFETY DATA SHEET
ACC1013

Vapor is heavier than air and may travel considerable distance to source of ignition and flashback.

=====
SECTION V - REACTIVITY DATA
=====

STABILITY: Stable

INCOMPATIBILITY (MATERIALS TO AVOID);

N/A

CONDITIONS TO AVOID:

Avoid strong acids, heat, open flames, sparks, hot surfaces, and oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS:

Oxides of carbon. Nitrogen.

HAZARDOUS POLYMERIZATION: Will not occur.

=====
SECTION VI - HEALTH HAZARD DATA
=====

EFFECTS OF OVEREXPOSURE:

ACUTE: Nausea and/or narcosis.

CHRONIC: N/A

TARGET ORGANS: Methanol-may cause liver, kidney, eye, lung, spleen, brain or nervous system damage, based on animal data.

SIGNS AND SYMPTOMS OF EXPOSURE:

Irritation to eyes and mucous membranes. Dryness and cracking of skin.

Liquid ingestion may cause vomiting.

CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE:

Respiratory ailments and liver ailments.

CARCINOGENICITY No

PRIMARY ROUTE(S) OF ENTRY: Inhalation, Eyes, Skin, Ingestion.

EMERGENCY AND FIRST AID PROCEDURES: .

Utilize the suggested methods below. In emergency situations notify a physician immediately.

SKIN: Wash with soap and water. Get medical attention.

EYES: Flush eyes abundently with clean water and refer to physician.

INGESTION: DO NOT induce vomiting. Refer to physician.

EXCESSIVE INHALATION: Remove patient to fresh air or give oxygen. Use CPR if patient is not breathing. Refer to physician.

=====
SECTION VII - SPECIAL PRECAUTIONS
=====

HANDLING & STORAGE:

Store in approved solvent storage area. Keep tightly closed. Keep away from heat open flames, sparks, hot surfaces and oxidizing agents.

OTHER PRECAUTIONS: N/A

=====
SECTION VIII - SPILL OR LEAK PROCEDURES
=====

MATERIAL SAFETY DATA SHEET
ACC1013

FOR SPILLS OR RELEASED MATERIAL:

Absorb spill in sand, earth, vermiculite, or other absorbent material. Shovel absorbed material into steel container and cover.

WASTE DISPOSAL METHOD:

Dispose of in accordance with federal, state, and local chemical and solvent waste disposal regulations.

=====
SECTION IX - SAFE HANDLING AND USE INFORMATION
=====

RESPIRATORY PROTECTION:

Use NIOSH-approved atmosphere supplying or air purifying respirator for organic vapors as required to maintain exposure levels below recommended limits.

VENTILATION: As specified.

LOCAL EXHAUST: Remove vapors during processing.

MECHANICAL EXHAUST: Explosion-proof equipment.

SPECIAL: Reduce vapor concentrations below specified limits.

PROTECTIVE GLOVES: PVA gloves

EYE PROTECTION: Goggles

OTHER PROTECTIVE EQUIPMENT:

Protective clothing as required to prevent skin contact.

HYGIENIC PRACTICES:

Keep area clean. Clean up spills immediately. Practice good personal hygiene.

=====
DISCLAIMER LIABILITY: Since conditions or methods of use are beyond our control - we do not assume any responsibility and expressly disclaim any liability for any use of this product. The information contained in this MSDS is believed to be true and accurate but all statements or suggestions are made without warranty - express or implied regarding the accuracy of the information - the hazards connected with the use of the product or the results to be obtained from the use thereof. Compliance with all federal state and local laws and regulations remains the responsibility of the user.

USER'S RESPONSIBILITY: This MSDS cannot cover all possible situations which the user may experience during processing. You should examine each aspect of your operation and determine if additional precautions should be taken. All health and safety information contained in this MSDS should be provided to your employees or customers. It is your responsibility to use this information to develop appropriate work practice guidelines and employee training programs for your operation.

660 gals/yr

MANUFACTURER'S NAME:
CLIFTON ADHESIVE, INC.
BURGESS PLACE
WAYNE, N.J. 07470

INFORMATION AND EMERGENCY
PHONE NUMBER: 973-694-0845

IN CASE OF SPILL OR LEAK INVOLVING
THIS MATERIAL-CALL CHEMTREC 24
HOURS A DAY AT 800-424-9300

DATE OF PREPARATION: 08-16-06

DOT NAME & NO.:

ADHESIVES, UN1133

SECTION I - PRODUCT IDENTIFICATION

PRODUCT NAME: FA1013 MIL-A-5540B Class 4 & 5
HMIS RATINGS: H F R PP
2 3 0 B

SECTION II - HAZARDOUS INGREDIENTS

THE FOLLOWING * ARE REPORTABLE UNDER SARA TITLE III-SECTION 313:

TOP FIVE AND/OR HAZARDOUS INGREDIENTS:	CAS NUMBER	ACGIH TLV	OSHA PEL
Toluene 41-46%	*108-88-3	50	100
Hexane 29-34%	110-54-3	50	50
TSR # 1397250002-5294P			
TSR # 1397250002-5027P			
TSR # 1397250002-5273P			
TSR # 1397250002-5155P			

** Above exposure limits are for air levels only. When skin contact occurs over exposure may result though air levels are less than limits listed above.

SECTION III - PHYSICAL DATA

BOILING Point: 149 DEG.F VAPOR DENSITY: 3.10
VAPOR PRESSURE (mm Hg @ TEMP): 71.68 at 20 deg C. or 68 F.
SPECIFIC GRAVITY: 0.86 WEIGHT/GAL: 7.18
APPEARANCE AND ODOR: Opaque Neutral. Characteristic solvent odor.
VOLATILE ORGANIC COMPOUND #/GAL.: 5.29
VOLATILE ORGANIC COMPOUND KG/LITER: 0.63

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: -10 DEG. F METHOD USED: TCC
FLAMMABLE LIMITS IN AIR % LEL 1.0 UEL 7.5
AUTO IGNITION TEMPERATURE: 510 DEG.F
EXTINGUISH MEDIA: CO 2, Foam, and dry chemical.
SPECIAL FIRE FIGHTING PROCEDURE:

MATERIAL SAFETY DATA SHEET

1013 MIL-A-5540B Class 4 & 5

NIOSH/MSHA-approved self-contained breathing apparatus should be worn. Use water spray to cool fire-exposed structures and disperse vapor cloud if fire is not present.

UNUSUAL FIRE AND EXPLOSION HAZARD:

Vapor is heavier than air and may travel considerable distance to a source of ignition and flashback.

=====
SECTION V - REACTIVITY DATA
=====

STABILITY: Stable.

INCOMPATIBILITY (MATERIALS TO AVOID);

N/A

CONDITIONS TO AVOID:

Avoid heat, open flames, sparks, hot surfaces and oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS:

Oxides of carbon, zinc, magnesium, sulfur. Hydrogen chloride
Hydrogen sulfide.

HAZARDOUS POLYMERIZATION: Will not occur.

=====
SECTION VI - HEALTH HAZARD DATA
=====

EFFECTS OF OVEREXPOSURE:

ACUTE: Nausea and/or narcosis.

CHRONIC: May cause nerve damage.

TARGET ORGANS: Toluene, based on animal data, may cause liver abnormalities, kidney, lung & spleen damage. In humans liver abnormalities.

Hexane may cause central nervous system effects or damage peripheral nerve tissue.

SIGNS AND SYMPTOMS OF EXPOSURE:

Irritation to eyes and mucous membranes. Dry and cracked skin. Liquid ingestion may result in vomiting. Numbness, tingling and weakness of arms or legs.

CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE:

Respiratory ailments.

CARCINOGENICITY No

WARNING: This product contains a chemical known to the State of California to cause cancer, birth defects and/or reproductive harm.

PRIMARY ROUTE(S) OF ENTRY: Inhalation, eyes, skin ingestion.

EMERGENCY AND FIRST AID PROCEDURES:

Utilize the suggested methods listed below. In emergency situations notify a physician immediately.

SKIN: Wash with soap and water. Refer to physician if irritation persists.

EYES: Flush eyes abundantly with clean water and refer to physician.

INGESTION: DO NOT induce vomiting. Refer to physician.

EXCESSIVE INHALATION: Remove patient to fresh air or give oxygen. Use CPR if patient is not breathing. Refer to physician.

=====
SECTION VII - SPECIAL PRECAUTIONS
=====

=====
HANDLING & STORAGE:

Keep containers tightly closed and store in approved solvent storage area. Keep away from open flame, heat sparks, hot surfaces and oxidizing agents.

OTHER PRECAUTIONS: N/A

=====
SECTION VIII - SPILL OR LEAK PROCEDURES
=====

FOR SPILLS OR RELEASED MATERIAL:

Absorb spill in sand, earth, vermiculite, or other absorbent material. Shovel absorbed material into steel container and cover.

WASTE DISPOSAL METHOD:

Dispose in accordance with federal, state, and local chemical and solvent waste disposal regulations.

=====
SECTION IX - SAFE HANDLING AND USE INFORMATION
=====

RESPIRATORY PROTECTION:

Use NIOSH-approved atmosphere supplying or air purifying respirator for organic vapors as required to maintain exposure levels below recommended limits.

VENTILATION: As specified.

LOCAL EXHAUST: Remove vapors during processing.

MECHANICAL EXHAUST: Explosion-proof equipment.

SPECIAL: Reduce vapor concentrations below specified limits.

PROTECTIVE GLOVES: PVA Gloves

EYE PROTECTION: Safety Glasses.

OTHER PROTECTIVE EQUIPMENT:

Protective clothing as required to prevent skin contact.

HYGIENIC PRACTICES:

Keep area clean. Clean up spills immediately. Practice good personal hygiene.

=====
DISCLAIMER LIABILITY: Since conditions or methods of use are beyond our control - we do not assume any responsibility and expressly disclaim any liability for any use of this product. The information contained in this MSDS is believed to be true and accurate but all statements or suggestions are made without warranty - express or implied regarding the accuracy of the information - the hazards connected with the use of the product or the results to be obtained from the use thereof. Compliance with all federal state and local laws and regulations remains the responsibility of the user.

USER'S RESPONSIBILITY: This MSDS cannot cover all possible situations which the user may experience during processing. You should examine each aspect of your operation and determine if additional precautions should be taken. All health and safety information contained in this MSDS should be provided to your employees or customers. It is your responsibility to use this information to develop appropriate work practice guidelines and employee training programs for your operation.

ASHLAND.

08/09/2007

SURVIVAL PRODUCTS INC
MSDS CONTACT MSDS CONTACT
5614 SW 25TH ST
HOLLYWOOD FL 33023
US

FILE
2200 gals/yr. 40 (35) gal
Activator & cleaning
ann 5/yr

ATTN:MSDS COORDINATOR

Ashland provides its customers with a Material Safety Data Sheet (MSDS) the first time a product is purchased or sampled for testing. In some cases, an MSDS is distributed on an annual basis to comply with specific regulatory requirements even if there has been no revision. If the MSDS is significantly changed, a copy of the revised sheet is sent to customers who purchased the product in the previous twelve months.

The Material Safety Data Sheet is addressed to the attention of the MSDS COORDINATOR and is sent according to the contact information that Ashland has on file for your organization. You should direct the Material Safety Data Sheet to those responsible for managing or designing operations involving the use of the product and those who use or handle the product and may potentially be exposed to it.

Ashland is committed to providing accurate health and safety information on the products that we manufacture or distribute. We appreciate your continued business.

If you have any further questions or concerns, please feel free to contact us.

US and Canada: 1-800-325-3751
All others: 614-790-4612

TOLUENE 20054

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Ashland	Regulatory Information Number	1-800-325-3751
P.O. Box 2219	Telephone	614-790-3333
Columbus, OH 43216	Emergency telephone number	1-800-ASHLAND (1-800-274-5263)

Product name	TOLUENE
Product code	20054
Product Use Description	SOLVENT

2. HAZARDS IDENTIFICATION

Emergency Overview

Appearance: liquid,, colourless

WARNING! FLAMMABLE LIQUID AND VAPOR. MAY AFFECT THE CENTRAL NERVOUS SYSTEM CAUSING DIZZINESS, HEADACHE OR NAUSEA. HARMFUL IF INHALED. MAY BE HARMFUL IF INHALED OR SWALLOWED. MAY CAUSE EYE IRRITATION. PROLONGED OR REPEATED CONTACT MAY DRY THE SKIN AND CAUSE IRRITATION AND BURNS. PROLONGED OR REPEATED CONTACT MAY DRY SKIN AND CAUSE IRRITATION.

Potential Health Effects

Routes of Exposure

Inhalation, Skin absorption, Skin contact, Eye Contact, Ingestion

Eye Contact

Can cause eye irritation. Symptoms include stinging, tearing, redness, and swelling of eyes.

Skin Contact

May cause mild skin irritation. Prolonged or repeated contact may dry the skin. Symptoms may include redness, burning, drying and cracking of skin, and skin burns. Passage of this material into the body through the skin is possible, but it is unlikely that this would result in harmful effects during safe handling and use.

Ingestion

TOLUENE 20054

Swallowing small amounts of this material during normal handling is not likely to cause harmful effects. Swallowing large amounts may be harmful. This material can get into the lungs during swallowing or vomiting. This results in lung inflammation and other lung injury.

Inhalation

Breathing of vapor or mist is possible. Breathing small amounts of this material during normal handling is not likely to cause harmful effects. Breathing large amounts may be harmful. Symptoms are not expected at air concentrations below the recommended exposure limits, if applicable (see Section 8.).

Aggravated Medical Condition

Preexisting disorders of the following organs (or organ systems) may be aggravated by exposure to this material: respiratory tract, skin, lung (for example, asthma-like conditions), kidney, central nervous system, auditory system, Individuals with preexisting heart disorders maybe more susceptible to arrhythmias (irregular heartbeats) if exposed to high concentrations of this material.

Symptoms

Signs and symptoms of exposure to this material through breathing, swallowing, and/or passage of the material through the skin may include: metallic taste, stomach or intestinal upset (nausea, vomiting, diarrhea), irritation (nose, throat, airways), central nervous system excitation (giddiness, liveliness, light-headed feeling) followed by central nervous system depression (dizziness, drowsiness, weakness, fatigue, nausea, headache, unconsciousness) and other central nervous system effects, temporary changes in mood and behavior, muscle weakness, loss of coordination, confusion, irregular heartbeat, coma, and death

Target Organs

Prolonged intentional toluene abuse may lead to damage to many organ systems having effects on: central and peripheral nervous systems, vision, hearing, liver, kidneys, heart and blood. Such abuse has been associated with brain damage characterized by disturbances in gait, personality changes and loss of memory. Comparable central nervous system effects have not been shown to result from occupational exposure to toluene., Prolonged intentional toluene abuse may lead to hearing loss progressing to deafness. In addition, while noise is known to cause hearing loss in humans, it has been suggested that workers exposed to organic solvents, including toluene, along with noise may suffer greater hearing loss than would be expected from exposure to noise alone., Overexposure to this material (or its components) has been suggested as a cause of the following effects in laboratory animals: mild, reversible liver effects, mild, reversible kidney effects, respiratory tract damage (nose, throat, and airways), effects on hearing,

TOLUENE 20054

central nervous system damage, Overexposure to this material (or its components) has been suggested as a cause of the following effects in humans:, kidney damage

Carcinogenicity

This material is not expected to cause cancer in humans since it did not cause cancer in laboratory animals. This material is not listed as a carcinogen by the International Agency for Research on Cancer (IARC), the National Toxicology Program (NTP), or the Occupational Safety and Health Administration (OSHA).

Reproductive Hazard

Toluene may be harmful to the human fetus based on positive test results with laboratory animals. Case studies show that prolonged intentional abuse of toluene during pregnancy can cause birth defects in humans.

Other Information

No data

3. COMPOSITION/INFORMATION ON INGREDIENTS

Components	CAS-No.	Concentration
TOLUENE	108-88-3	>=90-<=100%

4. FIRST AID MEASURES

Eyes

If symptoms develop, immediately move individual away from exposure and into fresh air. Flush eyes gently with water for at least 15 minutes while holding eyelids apart; seek immediate medical attention.

Skin

Remove contaminated clothing. Wash exposed area with soap and water. If symptoms persist, seek medical attention. Launder clothing before reuse.

Ingestion

Seek medical attention. If individual is drowsy or unconscious, do not give anything by mouth; place individual on the left side with the head down. Contact a physician, medical facility, or poison control center for advice about whether to induce vomiting. If possible, do not leave individual unattended.

Inhalation

TOLUENE 20054

If symptoms develop, move individual away from exposure and into fresh air. If symptoms persist, seek medical attention. If breathing is difficult, administer oxygen. Keep person warm and quiet; seek immediate medical attention.

Notes to Physician

Hazards: Inhalation of high concentrations of this material, as could occur in enclosed spaces or during deliberate abuse, may be associated with cardiac arrhythmias. Sympathomimetic drugs may initiate cardiac arrhythmias in persons exposed to this material. This material is an aspiration hazard. Potential danger from aspiration must be weighed against possible oral toxicity (See Section 2 - Swallowing) when deciding whether to induce vomiting.

Treatment: No information available.

5. FIRE-FIGHTING MEASURES

Suitable Extinguishing Media

foam, carbon dioxide (CO₂), dry chemical

Hazardous Combustion Products

May form: carbon dioxide and carbon monoxide, various hydrocarbons

Precautions for Fire-Fighting

Material is volatile and readily gives off vapors which may travel along the ground or be moved by ventilation and ignited by pilot lights, flames, sparks, heaters, smoking, electric motors, static discharge or other ignition sources at locations near the material handling point. Wear full firefighting turn-out gear (full Bunker gear), and respiratory protection (SCBA). Use water spray to cool fire exposed containers and structures until fire is out if it can be done with minimal risk. Avoid spreading burning liquid with water used for cooling purposes.

Flammability Class for Flammable Liquids

Flammable Liquid Class IB Flammable Liquid Class IB

6. ACCIDENTAL RELEASE MEASURES

Personal Precautions

For personal protection see section 8. Eliminate all ignition sources (flares, flames including pilot lights, electrical sparks). Persons not wearing protective equipment should be excluded from area of spill until clean-up has been completed. Stop spill at source. Prevent from entering drains, sewers, streams or other bodies of water. Prevent

TOLUENE 20054

from spreading. If runoff occurs, notify authorities as required. Pump or vacuum transfer spilled product to clean containers for recovery. Absorb unrecoverable product. Transfer contaminated absorbent, soil and other materials to containers for disposal.

Environmental Precautions

Prevent run-off to sewers, streams or other bodies of water. If run-off occurs, notify proper authorities as required, that a spill has occurred.

Methods for Cleaning Up

Absorb liquid on vermiculite, floor absorbent or other absorbent material.

7. HANDLING AND STORAGE

Handling

Containers of this material may be hazardous when emptied. Since emptied containers retain product residues (vapor, liquid, and/or solid), all hazard precautions given in the data sheet must be observed. Static ignition hazard can result from handling and use. Electrically bond and ground all containers, personnel and equipment before transfer or use of material. Special precautions may be necessary to dissipate static electricity for non-conductive containers. Use proper bonding and grounding during product transfer as described in National Fire Protection Association document NFPA 77.

Storage

Store in a cool, dry, ventilated area away from sources of heat, moisture, and incompatible substances. Store out of direct sunlight.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

Exposure Guidelines

TOLUENE		108-88-3
ACGIH	time weighted average	20 ppm
NIOSH	Recommended exposure limit (REL):	100 ppm
NIOSH	Recommended exposure limit (REL):	375 mg/m3
NIOSH	Short term exposure limit	150 ppm
NIOSH	Short term exposure limit	560 mg/m3
OSHA Z2	time weighted average	200 ppm
OSHA Z2	Ceiling Limit Value:	300 ppm
OSHA Z2	Maximum concentration:	500 ppm

TOLUENE 20054

General Advice

These recommendations provide general guidance for handling this product. Personal protective equipment should be selected for individual applications and should consider factors which affect exposure potential, such as handling practices, chemical concentrations and ventilation. It is ultimately the responsibility of the employer to follow regulatory guidelines established by local authorities.

Exposure Controls

Provide sufficient mechanical (general and/or local exhaust) ventilation to maintain exposure below TLV(s). Explosion-proof ventilation system is acceptable.

Eye Protection

Chemical splash goggles in compliance with OSHA regulations are advised; however, OSHA regulations also permit other type safety glasses. Consult your safety representative.

Skin and Body Protection

To prevent repeated or prolonged skin contact, wear impervious clothing and boots. Wear resistant gloves such as: polyvinyl alcohol

Respiratory Protection

If workplace exposure limit(s) of product or any component is exceeded (see exposure guidelines), a NIOSH-approved air supplied respirator is advised in absence of proper environmental control. OSHA regulations also permit other NIOSH respirators (negative pressure type) under specified conditions (see your industrial hygienist). Engineering or administrative controls should be implemented to reduce exposure.

9. PHYSICAL AND CHEMICAL PROPERTIES

Physical state	liquid
Form	Liquid,
Colour	colourless
Odour	hydrocarbon-like
Boiling point/range	231.1 °F / 110.6 °C
Melting point/range	-138.8 °F / -94.9 °C
pH	No data
Flash point	39.99 °F / 4.44 °C Closed Cup
Evaporation rate	2.00 (N-Butyl Acetate)
Explosion limits	1.27 %(V) 7 %(V)
Vapour pressure	3.786288 kPa @ 77 °F / 25 °C
Vapour density	3.1

TOLUENE 20054

Density	0.87 g/cm ³ @ 68.00 °F / 20.00 °C 7.25 lb/gal @ 68 °F / 20 °C
Solubility	negligible in water
Partition coefficient (n-octanol/water)	No data
Autoignition temperature	896 °F / 480 °C

10. STABILITY AND REACTIVITY

Stability

Stable.

Conditions to Avoid

Avoid contact with:

Incompatible Products

Avoid contact with:, strong acids, strong oxidizing agents

Hazardous Decomposition Products

May form:, carbon dioxide and carbon monoxide, various hydrocarbons

Hazardous Reactions

Product will not undergo hazardous polymerization.

Thermal Decomposition

No data

11. TOXICOLOGICAL INFORMATION

Acute Oral Toxicity

TOLUENE

LD 50 Rat: 2,600 - 7,500 mg/kg
LD 50 Rat: 5,000 mg/kg

Acute Inhalation Toxicity

TOLUENE

LC 50 Rat: 8000 ppm, 4 h

Acute Dermal Toxicity

TOLUENE 20054

IMDG_RAIL:
UN1294, TOLUENE 3, II

Dangerous goods descriptions (if indicated above) may not reflect package size, quantity, end-use or region-specific exceptions that can be applied. Consult shipping documents for descriptions that are specific to the shipment.

15. REGULATORY INFORMATION

California Prop. 65

WARNING! This product contains a chemical known in the State of California to cause cancer.

BENZENE

WARNING! This product contains a chemical known in the State of California to cause birth defects or other reproductive harm.

TOLUENE

BENZENE

Additional Regulations

US. Toxic Substances Control Act (TSCA) Section 8(d) Health & Safety Data Reporting (40 CFR 716, Subpt B)

US. Toxic Substances Control Act (TSCA) Section 8(d) Health & Safety Data Reporting (40 CFR 716, Subpt B)

US. Toxic Substances Control Act (TSCA) Section 8(d) Health & Safety Data Reporting (40 CFR 716, Subpt B)

US. OSHA Hazard Communication Standard: On One of the Floor Lists of the OSHA HCS (29 CFR 1910.1200).

US. High Production Volume Chemicals

US. Toxic Substances Control Act (TSCA) Section 4 - Master Testing List

US. Drug Enforcement Administration (DEA) Listed Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2))

US. Drug Enforcement Administration (DEA) Listed Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2))

US. Drug Enforcement Administration (DEA) Listed Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2))

US. Drug Enforcement Administration (DEA) Listed Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2))

TOLUENE

Toluene is a federal hazardous air pollutant and was identified as a toxic air contaminant in April 1993 under AB 2728.

CAS Registry Number: 108-88-3

Molecular Formula: C₇H₈

Description

Toluene is a colorless, flammable, non-corrosive liquid with a benzene-like odor. It is insoluble in water and soluble in acetone, absolute alcohol, ether, chloroform, benzene, petroleum ether, glacial acetic acid, and carbon disulfide (HSDB, 1991).

Physical Properties of Toluene

Molecular Weight	92.13
Boiling Point	110.7 oC
Melting Point	-95 oC
Flash Point	40 oF (closed cup)
Vapor Density	3.2 (air = 1)
Vapor Pressure	36.7 mm Hg at 30 oC
Density/Specific Gravity	0.866 at 20/4 oC (water = 1)
Log Octanol/Water Partition Coefficient	2.69
Conversion Factor	1 ppm = 3.77 mg/m ³

(HSDB, 1991; Merck, 1989; Sax, 1987; Sax, 1989; U.S. EPA, 1994a)

SOURCES AND EMISSIONS

A. Sources

Toluene is used in aviation gasoline and high-octane blending stock, and as a solvent for paints, coatings, gums and resins. Other sources include tobacco smoke, petroleum and coal production, use as a chemical intermediate, and for styrene production.

The primary stationary sources that have reported emissions of toluene in California are crude petroleum and natural gas extraction, petroleum refining, and household furniture manufacturing facilities (ARB, 1997b). Toluene has also been detected but not quantified in motor vehicle exhaust by the Air Resources Board (ARB) (ARB, 1995e).

Toluene was registered for use as a pesticide; however, as of January 1, 1987, it is no longer registered for pesticidal use in California (DPR, 1996).

B. Emissions

The total emissions of toluene from stationary sources in California are estimated to be at least 5.4 million pounds per year, based on data reported under the Air Toxics "Hot Spots" Program (AB 2588) (ARB, 1997b). In addition, ARB staff estimates that 12.6 million and 62 thousand pounds per year are emitted from area and natural sources, respectively (ARB, 1990b).

C. Natural Occurrence

Natural sources of toluene include volcanos, forest fires, and crude oil (HSDB, 1991).

AMBIENT CONCENTRATIONS

Toluene is routinely monitored by the statewide ARB air toxics network. The network's mean concentration of toluene from January 1996 through December 1996 is estimated to be 8.29 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) or 2.2 parts per billion (ppb) (ARB 1997c).

The United States Environmental Protection Agency (U.S. EPA) has also reported concentrations of toluene from 14 study areas during 1989 to 1991. The overall mean concentration from these areas was $10.2 \mu\text{g}/\text{m}^3$ (2.7 ppb) (U.S. EPA 1993a).

INDOOR SOURCES AND CONCENTRATIONS

Environmental tobacco smoke (ETS) emissions of toluene were measured using six cigarette brands popular in California and one reference cigarette. Toluene had an average emission of $656 \mu\text{g}/\text{cigarette}$ (Daisey et al., 1994).

There have been studies that have measured toluene within vehicles. A southern California study measured an average toluene in-vehicle concentration of $136.5 \mu\text{g}/\text{m}^3$ (36.3 ppb) and a maximum concentration of $994.6 \mu\text{g}/\text{m}^3$ (264.5 ppb) during the summer of 1987 and winter of 1988 (Shikiya et al., 1989). Similar studies in Raleigh, North Carolina and Boston, Massachusetts measured average concentrations of 33.3 and $46.5 \mu\text{g}/\text{m}^3$ (8.9 and 12.4 ppb) and maximum concentrations of 105 and $118.9 \mu\text{g}/\text{m}^3$ (27.9 and 31.6 ppb), respectively (Chan et al., 1991a; Chan et al., 1991b). These studies found toluene concentrations to be 2 to 5 times greater than outdoor toluene concentrations.

ATMOSPHERIC PERSISTENCE

Toluene exists in the atmosphere in the gas phase, and the dominant tropospheric loss process is by reaction with the OH radical. The calculated half-life and lifetime of toluene due to reaction with the OH radical are 1.7 days and 2.4 days, respectively (Atkinson, 1995). The reaction products include benzaldehyde, benzyl nitrate, cresols, glyoxal, methylglyoxal, and poorly understood ring-opened compounds (Atkinson, 1994).

AB 2588 RISK ASSESSMENT INFORMATION

The Office of Environmental Health Hazard Assessment reviews risk assessments submitted under the Air Toxics "Hot Spots" Program (AB 2588). Of the risk assessments reviewed as of December 1996, for non-cancer health effects, toluene contributed to the total hazard index in 51 of the approximately 89

risk assessments reporting a total chronic hazard index greater than 1. Toluene also contributed to a total hazard index greater than 1 in 7 of the approximately 107 risk assessments reporting a total acute hazard index greater than 1, and presented an individual hazard index greater than 1 in 1 of these risk assessments (OEHHA, 1996b).

HEALTH EFFECTS

The most probable route of human exposure to toluene is inhalation (HSDB, 1991).

Non-Cancer: Exposure to toluene may cause mild eye and respiratory tract irritation. The central nervous system (CNS) is the primary target organ for acute and chronic exposures. Toluene is a CNS depressant. Exposure may cause cardiac arrhythmias. Liver and kidney injury may occur with exposures to high concentrations. Long-term abuse by inhalation has caused CNS impairment (U.S. EPA, 1994a).

A chronic non-cancer Reference Exposure Level (REL) of 200 $\mu\text{g}/\text{m}^3$ is listed for toluene in the California Air Pollution Control Officers Association Air Toxics "Hot Spots" Program, Revised 1992 Risk Assessment Guidelines. The toxicological endpoints considered for chronic toxicity are the central or peripheral nervous system, and the reproductive system including teratogenic and developmental effects (CAPCOA, 1993). The U.S. EPA has established a Reference Concentration (RfC) of 400 $\mu\text{g}/\text{m}^3$ for toluene based on neurological effects in humans. The U.S. EPA estimates that inhalation of this concentration or less, over a lifetime, would not likely result in the occurrence of chronic non-cancer effects. The U.S. EPA has established an oral Reference Dose of 0.2 milligrams per kilogram per day based on changes in liver and kidney weights in rats. The U.S. EPA estimates that consumption of this dose or less, over a lifetime, would not likely result in the occurrence of chronic, non-cancer effects.

Children of pregnant women exposed to toluene by inhalation have been reported to have developmental effects, such as CNS dysfunction, attention deficits, and minor craniofacial and limb anomalies; however, these studies were confounded by exposure to multiple chemicals. A number of case reports of toluene abuse via inhalation by pregnant women have also shown similar effects. Reproductive effects, including an association between paternal exposure to toluene and an increased odds ratio for spontaneous abortions but not birth defects, have also been noted. However, these studies are not conclusive due to many confounding variables. Several inhalation studies have shown toluene to be a developmental toxicant, but not a reproductive toxicant, in rodents (U.S. EPA, 1994a). The State of California under Proposition 65 has determined that toluene is a developmental toxicant (CCR, 1996).

Cancer: Two epidemiological studies did not detect a statistically significant increased risk of cancer due to inhalation exposure to toluene. However, these studies were limited due to the size of the study population and lack of historical monitoring data. The U.S. EPA has placed toluene in Group D: Not classifiable as a carcinogen (U.S. EPA, 1994a). The International Agency for Research on Cancer has placed toluene in Group 3: Not classifiable as a carcinogen (IARC, 1989b).

129 - 711 - 11
(EM) EN 0 115



PRODUCTS INC.

WORKING COPY

07 September 2008

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301

VIA FAX AND MAIL

Subject: Your 03 SEP 08 Letter

Dear Mr. Bittle:

First of all, thank you very much for your prompt reply to my 29 AUG 08 letter.

Survival Products, Inc. (SPI) feels that the following calculations utilizing the data provided to your office in my 15NOV08 and 10JUL08 letters and the MSDS'S substantiates SPI's not requiring a state of Florida air permit and therefore no agency action.

Notes:

YEAR 2004 PURCHASES (MAXIMUM PURCHASE YEAR)

2200 USG (Toluene), 605 USG (Adhesive), 15 USG (Accelerator)

(Straight) Toluene $2200 (7.25) / 2000 = 7.98$ TPY Toluene $15,950 \frac{lbs}{yr} \times \frac{1yr}{365days} = 44 \frac{lbs}{day}$

Adhesive $605 (7.18) (46) / 2000 = 1.00$ TPY Toluene $1997.2 \frac{lbs}{yr} \times \frac{1yr}{365days} = 5.5 \frac{lbs}{day}$

Adhesive $605 (7.18) (34) / 2000 = 0.74$ TPY Adhesive/Hexane $1477 \frac{lbs}{yr} = 4.1 \frac{lbs}{day}$

Accelerator $15 (7.31) (.79) / 2000 = 0.04$ TPY Accelerator/Methanol $87 \frac{lbs}{yr} = 0.24 \frac{lbs}{day}$

① This is not your potential. This is your actual. Potential is calculated based on facility max operation, which has yet to be determined

② Even if we assume all HAPs to be VOCs - you exceed the 44 lbs limit of SCGP - #1 total 254 lbs/day

Total Toluene = 8.98 TPY, Hexane = 0.74 TPY, Methanol = 0.04 TPY = 9.76 TPY Total HAPs

These totals are less than the 10 TPY and 25 TPY single and combination potential pollutant emissions limitations specified in 62-210.310(2)(a)

YEAR 2005 PURCHASES

1650 USG (Toluene), 765 USG (Adhesive), 35 USG (Accelerator)

Total Toluene = 7.24 TPY, Hexane = 0.94 TPY, Methanol = 0.10 TPY = 8.28 TPY Total HAPs
*demonstrate $\approx 45.3 \frac{lbs}{day}$



Page 2 (07 SEP 08 / C. Bittle)

YEAR 2006 PURCHASES

1595 USG (Toluene), 742 USG (Adhesive), 15 USG (Accelerator)

** de-activate*

Total Toluene = 7.01 TPY, Hexane = 0.91 TPY, Methanol = 0.04 TPY = 7.96 TPY Total HAPs
*≈ 43.6 lbs
201*

YEAR 2007 PURCHASES

2200 USG (Toluene), 478 USG (Adhesive), 15 USG (Accelerator)

** de-activate*

Total Toluene = 8.77 TPY, Hexane = 0.58 TPY, Methanol = 0.04 TPY = 9.39 TPY Total HAPs
*≈ 51.5 lbs
201*

The above calculations indicate that SPI's potential is below the emissions limitations specified in 62-210.310(2)(a) and therefore SPI will register for an Air General Permit which requires no agency action.

Your careful consideration of the above calculations and concurrence with SPI's proposed registration for an Air General Permit is requested. Please feel free to request any further information you might require.

Sincerely,

Charles G. Rogers, Jr.
President

cc: GEI / Jose Vega
BC-EPD / Mark Gerberding

954-529-1475
GENERAL INQ



07 September 2008

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301

VIA FAX AND MAIL

Subject: Your 03 SEP 08 Letter

Dear Mr. Bittle:

First of all, thank you very much for your prompt reply to my 29 AUG 08 letter.

Survival Products, Inc. (SPI) feels that the following calculations utilizing the data provided to your office in my 15NOV08 and 10JUL08 letters and the MSDS'S substantiates SPI's not requiring a state of Florida air permit and therefore no agency action.

YEAR 2004 PURCHASES (MAXIMUM PURCHASE YEAR)

2200 USG (Toluene), 605 USG (Adhesive), 15 USG (Accelerator)

$2200 (7.25) / 2000 = 7.98$ TPY Toluene

$605 (7.18) (.46) / 2000 = 1.00$ TPY Toluene

$605 (7.18) (.34) / 2000 = 0.74$ TPY Adhesive/Hexane

$15 (7.31) (.79) / 2000 = 0.04$ TPY Accelerator/Methanol

Total Toluene = 8.98 TPY, Hexane = 0.74 TPY, Methanol = 0.04 TPY

These totals are less than the 10 TPY and 25 TPY single and combination potential pollutant emissions limitations specified in 62-210.310(2)(a)

YEAR 2005 PURCHASES

1650 USG (Toluene), 765 USG (Adhesive), 35 USG (Accelerator)

Total Toluene = 7.24 TPY, Hexane = 0.94 TPY, Methanol = 0.10 TPY



Page 2 (07 SEP 08 / C. Bittle)

YEAR 2006 PURCHASES

1595 USG (Toluene), 742 USG (Adhesive), 15 USG (Accelerator)

Total Toluene = 7.01 TPY, Hexane = 0.91 TPY, Methanol = 0.04 TPY

YEAR 2007 PURCHASES

2200 USG (Toluene), 478 USG (Adhesive), 15 USG (Accelerator)


Total Toluene = 8.77 TPY, Hexane = 0.58 TPY, Methanol = 0.04 TPY

The above calculations indicate that SPI's potential is below the emissions limitations specified in 62-210.310(2)(a) and therefore SPI will register for an Air General Permit which requires no agency action.

Your careful consideration of the above calculations and concurrence with SPI's proposed registration for an Air General Permit is requested. Please feel free to request any further information you might require.

Sincerely,

Charles G. Rogers, Jr.
President


cc: GEI / Jose Vega
BC-EPD / Mark Gerberding

RECEIVED
AIR QUALITY DIVISION



PRODUCTS INC.

2008 SEP -5 PM 1: 38

29 August 2008

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301

VIA FAX AND MAIL

Subject: Air Permit Application

Dear Mr. Bittle:

First of all, thank you very much for extending our Hearing date until 25 September 2008.

Survival Products, Inc. (SPI) has contracted with GeoTech Environmental, Inc. (GEI) to help us file an application for Air Permit with your office. Both SPI and GEI feel that SPI is eligible for an Air General Permit as specified by the limitations itemized in 62-210.310(2)(a)1., F.A.C.. SPI potential is well below these limitations as indicated in my 15NOV07 and 10JUL08 letters to you.

GEI's Jose Vega talked with your Josie Cisneros in a 14AUG08 telcon in which she told him that SPI is required to file for a Title V Permit without any reason. I disagree with that since SPI's potential is well below the 10 (SPI 7.3 TPY) and 25 (SPI 7.6 TPY) tons per year for single and combination potential pollutant emissions limitations itemized in 62-210.310(2)(a). Also, actual emissions are almost negligible as indicated by the toluene purchases and waste disposal numbers in my 15NOV07 and 10JUL07 letters to you (0.8 TPY).

Your careful consideration of SPI's proposed application for Air General Permit instead of a Title V application will be greatly appreciated. Please feel free to request any further information you might require and let me know as to your findings on this subject.

Sincerely,

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

Charles G. Rogers, Jr.
President

cc: GEI/Jose Vega

Cisneros, Josefina

From: Cisneros, Josefina
Sent: Thursday, September 04, 2008 1:51 PM
To: 'sales@survivalproductsinc.com'
Subject: Response Ltr
Attachments: Survival Products, Inc. State Permit Ltr.pdf

Mr. Rogers,

We attempted to fax you this letter yesterday and today. You're fax number just keeps ringing and/or rings busy without connection. Please see attached letter in response to your faxed letter you sent on August 29th. The original will follow via mail.

Sincerely,

*Josie Cisneros
Natural Resource Specialist II
Environmental Protection & Growth Management Department
Pollution Prevention, Remediation & Air Quality Division
Mailing Address:
115 S. Andrews Avenue, Room A-240
Fort Lauderdale, FL 33301
Phone: (954) 519-1215
Fax: (954) 519-1495*

The Pollution Prevention, Remediation and Air Quality Division values your feedback as a customer. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the PPRAQ Customer Survey](#). Thank you.



Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION
Mailing Address: 115 South Andrews Avenue, Room A-240, Fort Lauderdale, Florida 33301
954-519-1260 • FAX 954-765-4804

September 3, 2008

Mr. Charles Rogers, President
Survival Products, Inc.
5614 SW 25th Street
Hollywood, FL 33023

VIA FAX AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: Survival Products, Inc. Air Permit Application

Dear Mr. Rogers:

The Broward County Pollution Prevention, Remediation and Air Quality Division (PPRAQ) acknowledges receipt of your letter dated August 29, 2008 received by facsimile.

The product usage information and the material safety data sheets (MSDS) provided by Survival Products to the PPRAQ in 2007 indicate that a state of Florida air permit is required for the facility. However, as of September 3, 2008, Survival Products has provided no information to the PPRAQ to demonstrate that a Florida air permit is not required and has failed to respond to requests for additional information. Contrary to your assertion, the PPRAQ has not advised Survival Products that a Title V permit is unequivocally required.

In a previous communication, the PPRAQ extended the deadline for receipt of an air permit application to September 8, 2008, and the NOV Hearing is scheduled for September 25, 2008.

Should you have any further questions, please contact the PPRAQ at 954-519-1220.

Sincerely,

Clifton R. Bittle
Environmental Licensing Manager
Pollution Prevention, Remediation and Air Quality Division

cc: file

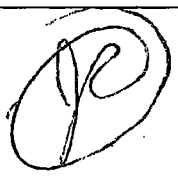
Mr. Jose Vega, Project Manager, GeoTech Environmental & Engineering Consultants
Mark Gerberding, Enforcement Administration

FAX COVER LETTER

DATE: 9/3/08
TO: Mr. Charles Rogers
FAX No.: 954-966-3584
FROM: Air Quality Division

2 No. of pages including this cover sheet

SUBJECT: Please see attached - original to follow via mail

*Fax # does not work -
Set via email on 9/4/08* 

452-519-1495



29 August 2008

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301

VIA FAX AND MAIL

Subject: Air Permit Application

Dear Mr. Bittle:

First of all, thank you very much for extending our Hearing date until 25 September 2008.

Survival Products, Inc. (SPI) has contracted with GeoTech Environmental, Inc. (GEI) to help us file an application for Air Permit with your office. Both SPI and GEI feel that SPI is eligible for an Air General Permit as specified by the limitations itemized in 62-210.310(2)(a)1., F.A.C.. SPI potential is well below these limitations as indicated in my 15NOV07 and 10JUL08 letters to you.

GEI's Jose Vega talked with your Josie Cisneros in a 14AUG08 telcon in which she told him that SPI is required to file for a Title V Permit without any reason. I disagree with that since SPI's potential is well below the 10 (SPI 7.3 TPY) and 25 (SPI 7.6 TPY) tons per year for single and combination potential pollutant emissions limitations itemized in 62-210.310(2)(a). Also, actual emissions are almost negligible as indicated by the toluene purchases and waste disposal numbers in my 15NOV07 and 10JUL07 letters to you (0.8 TPY).

Your careful consideration of SPI's proposed application for Air General Permit instead of a Title V application will be greatly appreciated. Please feel free to request any further information you might require and let me know as to your findings on this subject.

Sincerely,

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

Charles G. Rogers, Jr.
President

cc: GEI/Jose Vega



Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION
Mailing Address: 115 South Andrews Avenue, Room A-240, Fort Lauderdale, Florida 33301
954-519-1260 • FAX 954-765-4804

August 14, 2008

Mr. Charles Rogers, President
Survival Products, Inc.
5614 SW 25th Street
Hollywood, FL 33023

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: Survival Products, Inc. Air Permit Application

Dear Mr. Rogers:

This letter is in response to correspondence received on August 8, 2008 from Mr. Jose Vega with GeoTech Environmental & Engineering Consultants requesting a 30-day extension for completion of Survival Product's air permit application. Pursuant to communications between Pollution Prevention, Remediation and Air Quality Division (PPRAQ) staff and Mr. Vega, the Surface Coating Air General Permit Registration Form intended for submittal by GeoTech, is not the correct air permit application for your facility. Attached with this letter is a copy of Application for Air Permit – Long Form, DEP Form No. 62-210.900(1), the appropriate application which was mailed to you with Warning Notice WRN08-0031 on January 25, 2008.

In response to the extension request, the PPRAQ feels that Survival Products, Inc. has had ample time and opportunity to submit an air permit application since initial warning notice issuance and subsequent Notice of Violation dated May 19, 2008. However, the PPRAQ grants a final extension to no later than September 8, 2008. Please complete and submit the attached application with appropriate fee by the indicated date. Subsequently, a letter confirming continuance of Survival Product's enforcement hearing to September 25, 2008 will be sent under separate cover by Enforcement Administration staff.

Should you have any further questions, please contact Ms. Josie Cisneros of the PPRAQ at 954-519-1215.

Sincerely,

Clifton R. Bittle
Environmental Licensing Manager
Pollution Prevention, Remediation and Air Quality Division

cc: file

Mr. Jose Vega, Project Manager, GeoTech Environmental & Engineering Consultants
Mark Gerberding, Enforcement Administration

Cisneros, Josefina

From: Cisneros, Josefina
Sent: Thursday, August 14, 2008 10:10 AM
To: 'sales@survivalproductsinc.com'; 'vegaj@geotech-usa.com'
Cc: Bittle, Clifton; Gerberding, Mark; Fernandez, Cynthia
Subject: State Air Permit Application
Attachments: Survival Products, Inc. Extension Response Ltr.pdf; dep62_210_900(1).pdf

My apologies...per Mr. Vega's request, attached is a .pdf copy of the correct air permit application referenced in the attached letter.

*Josie Cisneros
Natural Resource Specialist II
Environmental Protection & Growth Management Department
Pollution Prevention, Remediation & Air Quality Division
Mailing Address:
115 S. Andrews Avenue, Room A-240
Fort Lauderdale, FL 33301
Phone: (954) 519-1215
Fax: (954) 519-1495*

From: Cisneros, Josefina
Sent: Thursday, August 14, 2008 10:08 AM
To: 'sales@survivalproductsinc.com'; 'vegaj@geotech-usa.com'
Cc: Bittle, Clifton; Gerberding, Mark; Fernandez, Cynthia
Subject: Survival Products Extension Request Response

Mr. Rogers and Mr. Vega,

Per letter received dated August 8th from GeoTech and per telephone conversation with Mr. Vega yesterday, please see the attached response letter. The original will be mailed to Mr. Rogers via certified mail. Should you have any questions feel free to contact me.

Thank you,

*Josie Cisneros
Natural Resource Specialist II
Environmental Protection & Growth Management Department
Pollution Prevention, Remediation & Air Quality Division
Mailing Address:
115 S. Andrews Avenue, Room A-240
Fort Lauderdale, FL 33301
Phone: (954) 519-1215
Fax: (954) 519-1495*

The Pollution Prevention, Remediation and Air Quality Division values your feedback as a customer. Please take a few minutes to comment on the quality of service you received. Simply click on [this link](#) to the PPRAQ Customer Survey. Thank you.

8/14/2008

Cisneros, Josefina

From: Cisneros, Josefina
Sent: Thursday, August 14, 2008 10:08 AM
To: 'sales@survivalproductsinc.com'; 'vegaj@geotech-usa.com'
Cc: Bittle, Clifton; Gerberding, Mark; Fernandez, Cynthia
Subject: Survival Products Extension Request Response
Attachments: Survival Products, Inc. Extention Response Ltr.pdf

Mr. Rogers and Mr. Vega,

Per letter received dated August 8th from GeoTech and per telephone conversation with Mr. Vega yesterday, please see the attached response letter. The original will be mailed to Mr. Rogers via certified mail. Should you have any questions feel free to contact me.

Thank you,

*Josie Cisneros
Natural Resource Specialist II
Environmental Protection & Growth Management Department
Pollution Prevention, Remediation & Air Quality Division
Mailing Address:
115 S. Andrews Avenue, Room A-240
Fort Lauderdale, FL 33301
Phone: (954) 519-1215
Fax: (954) 519-1495*

The Pollution Prevention, Remediation and Air Quality Division values your feedback as a customer. Please take a few minutes to comment on the quality of service you received. Simply click on [this link](#) to the PPRAQ Customer Survey. Thank you.

8/14/2008



ENVIRONMENTAL & ENGINEERING CONSULTANTS

August 8, 2008

File No. 020828

Via: Electronic Mail to mgerberding@broward.org

Mr. Mark Gerberding, Enforcement Administrator
Broward County Environmental Protection Department (BC-EPD)
Pollution Prevention and Remediation Division
115 S. Andrews Avenue, Room A-240
Fort Lauderdale, Florida 33301

Subject: Notification to Prepare a General Air Permit for Survival Products, Inc. (SPI) located at 5614 S.W. 25th Street, Hollywood, Florida 33023, (Notice of Violation (NOV08-0024))

Dear Mr. Gerberding:

GeoTech Environmental, Inc. (GeoTech) has been retained by Mr. Charles Rogers, President of Survival Products, Inc.; (SPI) located at 5614 S.W. 25th Street, Hollywood, Florida 33023. SPI was issued a Notice of Violation (NOV08-0024) for operating a source of air pollution without a State of Florida General Air Permit

GeoTech is to proceed on behalf of SPI and respond to the BC-EPD letter dated July 9, 2008 requesting a continuance hearing date of August 28, 2008. GeoTech will review the applicability of the FDEP guidelines under the Florida Administrative Code (FAC) to verify the VOC & HAP current emissions at the site and prepare an air general permit application, if required.


In order to meet the goals and objective, GeoTech is respectfully requesting that 30-days time extension be allowed for completion of the following tasks:

1. Conduct a thorough site inspection of the facility.
2. Verify operations, Review MSDS and conduct an inventory of chemical purchases and an inventory of chemical daily, weekly and monthly usage.
3. Prepare an Air General Permit.

If you should have any questions or comments concerning this letter, please contact me at (954) 597-9100 or via email at vegaj@geotech-usa.com.

Sincerely,

GEOTECH ENVIRONMENTAL, INC.



Jose Vega
Project Manager

Pc: Mr. Charles G. Rogers, Jr., President, Survival Products, Inc.



Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION
 Mailing Address: 115 South Andrews Avenue, Room A-240, Fort Lauderdale, Florida 33301
 954-519-1260 • FAX 954-765-4804

July 30, 2008

Mr. Charles Rogers, President
 Survival Products, Inc.
 5614 SW 25th Street
 Hollywood, FL 33023

VIA CERTIFIED MAIL
 RETURN RECEIPT REQUESTED

Dear Mr. Rogers:

This letter is in response to your request presented on July 11, 2008 during the settlement conference, asking the Pollution Prevention, Remediation and Air Quality Division (PPRAQ) to advise in writing whether there is an exemption from air permitting rules or air quality control requirements for facilities manufacturing life saving equipment.

Pursuant to Florida Administrative Code (F.A.C.) Section 62-210.300(3) and Broward County Code (BCC) Article IV, Section 27-176, there are no exemption criteria for life saving equipment manufacturing. Further, in response to your request, the PPRAQ provided you with a copy of BCC Section 27-176 on October 10, 2007 via fax and a copy of Section 62-210 and 62-213, F.A.C. via email. The PPRAQ feels we have adequately responded to you request through this letter and in past correspondence.

In addition, as stated during the settlement conference the use of Toluene, adhesives containing Toluene and Hexane, and accelerators containing Methanol as part of your manufacturing process are EPA regulated hazardous air pollutants requiring air permit determination per Rules 62-4.030, 62-210.300 and 62-213, F.A.C. particularly since these chemicals are directly emitted to atmosphere without control. As previously agreed upon in the settlement conference, the PPRAQ expects to receive your application for state air permit no later than August 28, 2008, per the continuance of your hearing date.

Should you have any further questions, please contact the PPRAQ at 954-519-1220.

Sincerely,

Clifton R. Bittle
 Environmental Licensing Manager
 Pollution Prevention, Remediation and Air Quality Division

cc: file

M. Gerberding, Enforcement Administration

Broward County Board of Cou:
 Josephus Eggelietion, Jr. • Sue Gunzburger • Kristin D. Jacobs • Ken Keechl • Ilene Lieberma
 www.broward.

9527 7869 5000 9922 5003

U.S. Postal Service		CERTIFIED MAIL™ RECEIPT	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>			
For delivery information visit our website at www.usps.com			
OFFICIAL USE			
Postage	\$	Postmark Here	
Certified Fee			
Return Receipt Fee (Endorsement Required)			
Restricted Delivery Fee (Endorsement Required)			
Total Postage & Fees	\$		
Sent To		Mr. Charles Rogers / Survival Products	
Street, Apt. No., or PO Box No.			
City, State, ZIP+4			
PS Form 3800, June 2002		See Reverse for Instructions	



ENVIRONMENTAL PROTECTION DEPARTMENT - Air Quality Division
Mailing Address: 115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301
954-519-1220 • FAX 954-519-1495

FAX COVER LETTER

DATE: 7/30/08
TO: Mr. Charles Rogers / Summit Products, Inc
FAX No.: 954-966-3584
FROM: Ms. JOSIE CISNEROS

2 No. of pages including this cover sheet

SUBJECT: Per your request - please see attached
letter. The original will follow via email
& certified mail.

Thank You,
Josie

Cisneros, Josefina

From: Cisneros, Josefina
Sent: Wednesday, July 30, 2008 5:01 PM
To: 'sales@survivalproductsinc.com'
Cc: Gerberding, Mark; Fernandez, Cynthia
Subject: Exemption Review Response Letter
Attachments: Survival Products, Inc. Exemption Review Response Ltr.pdf

Mr. Rogers,

Please see the attached response to your request for exemption review. I have also faxed you a copy today. You will be receiving the original via certified mail.

Sincerely,

*Josie Cisneros
Natural Resource Specialist II
Environmental Protection & Growth Management Department
Pollution Prevention, Remediation & Air Quality Division
Mailing Address:
115 S. Andrews Avenue, Room A-240
Fort Lauderdale, FL 33301
Phone: (954) 519-1215
Fax: (954) 519-1495*

The Pollution Prevention, Remediation and Air Quality Division values your feedback as a customer. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the PPRAQ Customer Survey](#). Thank you.

7/30/2008

Cisneros, Josefina

From: Gerberding, Mark
Sent: Tuesday, July 15, 2008 9:38 AM
To: Fernandez, Cynthia; Cisneros, Josefina; Bittle, Clifton
Cc: Jones, Daphne; Brannon, Meredith
Subject: NOV08-0024 Survival Products Inc.

The hearing scheduled for this NOV on Thursday, July 24 has been continued until Thursday August 28.

Mark Gerberding, Natural Resource Specialist II
Enforcement Administration
Environmental Monitoring and Enforcement Division
Broward County Environmental Protection and
Growth Management Department
One North University Drive, Plantation, FL 33324-2038
(954)519-1481
(954)519-1493
www.broward.org

7/11/08 Settlement Mtg - Survival Products

Mr. Rogers stated usages on letter dated 10/31/07
are gallons -

- ① Adhesive
- ② Accelerator
- ③ Toluene.

~~30:1~~ 30:1 ratio - Adhesive to accelerator
Also - see attachments
Business airlines life rafts.

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301



PRODUCTS INC.

2008 JUL 11 AM 10:38

10 July 2008

Subject: Your 15NOV07 Letter

Dear Mr. Bittle:

The following is in response to your 15NOV07 letter and corresponds to the item numbers listed.

1. The units of measure in Item 2 of my 31OCT07 letter are as follows: Adhesive/Accelerator are in USG as indicated. Toluene is in 55 USG drums. Toluene/Adhesive/Accelerator waste disposal are in 55 USG drums.
2. No records are kept on daily usage of Adhesive/Accelerator/Toluene usage.
3. No records are kept on daily mixing of Adhesive/Accelerator.
4. SPI's shop manufactures rafts eight hours per day, five days per week. No daily records are kept as to rafts manufactured per day since raft manufacture is a two to three week process on the average and varies as to the raft size.

SPI's figures for years 2004 through 2007 show Adhesive/Accelerator purchases of 2100 USG and Toluene purchases of 7145 USG. Waste Toluene/Adhesive/Accelerator disposal for the same period was 8415 USG. The difference between purchases and waste disposal is therefore 830 USG. Most of this difference remains in the manufactured raft.

I was disappointed to learn that your office had complained to OSHA about SPI. You did this without even checking SPI's safety record which has been almost impeccable over thirty eight years of operation. One good thing did come out of this complaint. That being the fact that OSHA's eight hour fume exposure tests on five SPI employees resulted in exposure levels that were either Non-Detectable or Minimal. These test results help bear out the figures in the above paragraph that VOC emissions are minimal

It should be noted that I asked many times what the cost of your licensing fee would be or even what range it would be in, without an answer. Also SPI's adhesive supplier thought that manufacturers of life saving equipment were exempt from air control licensing requirements. My 27FEB08 to you Mr. Wilkins asking you to check into this remains unanswered.

I have successfully worked many years with your office's Hazardous Material Licensing and hope to work with you in the same manner.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Rogers, Jr.' with a stylized flourish at the end.

Charles G. Rogers, Jr.
President

~~27 February 2008~~

Received 7/11/08
at mtg

RECEIVED
AIR QUALITY DIVISION

2008 JUL 11 AM 10: 38

Mr. Richard G. Wilkins
Department Director
Environmental Protection Department
Air Quality Division
115 South Andrews Avenue, Room A-240
Fort Lauderdale, Florida 33301

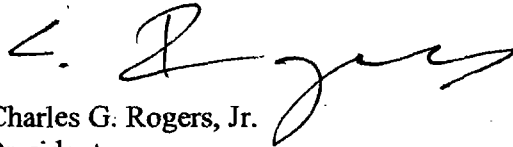
Subject: Warning Notice WRN08-0031 Received 04 FEB 08

Dear Mr. Wilkins:

Survival Products, Inc.'s adhesive manufacture thought that manufacturers of "LIFE SAVING EQUIPMENT" are exempt from air quality controls such as you are indicating in the above subject matter. Please check this out and advise SPI as to your findings.

Thank you in advance for you consideration in this matter.

Sincerely,



Charles G. Rogers, Jr.
President

Cisneros, Josefina

From: Gerberding, Mark
Sent: Monday, June 30, 2008 4:04 PM
To: Bittle, Clifton; Jones, Daphne; Cisneros, Josefina; Fernandez, Cynthia
Subject: Survival Products, Inc. settlement conference

Mr. Rodgers called and said he wanted to reschedule his settlement conference with us. I rescheduled the meeting for Friday July 11 and asked him to bring information that Cliff requested in his Nov. 15, 2007 letter, so that we could identify what type of permit he would need and also for penalty computation.

Mark Gerberding, Natural Resource Specialist II
Enforcement Administration
Environmental Monitoring and Enforcement Division
Broward County Environmental Protection and
Growth Management Department
One North University Drive, Plantation, FL 33324-2038
(954)519-1481
(954)519-1493
www.broward.org

7/11/2008



Environmental Protection and Growth Management Department – ENFORCEMENT ADMINISTRATION
Mailing Address: 115 South Andrews Avenue, Room A-240 · Fort Lauderdale, Florida 33301 · 954-519-1210 · FAX 954-519-1493

**NOTICE OF VIOLATION
and
NOTICE OF HEARING
TO ASSESS A CIVIL PENALTY**

NOTICE OF VIOLATION NUMBER: NOV08-0024

Page 1 of 3

The undersigned certifies that he/she has just grounds to believe that on or about November 09, 2007, 0930 hours, at the location below, the following Respondent(s) violated the section(s) of the Broward County Code (BCC) identified in each count:

Location: 5614 SW 25TH ST
Hollywood, FL 33023

COUNT 1: Respondent: Survival Products, Inc.

Violated section 27-175(a), BCC, which states:

"Unless otherwise authorized by this article, no owner or operator shall construct or operate any source of air pollution, including parking facility(ies), except in accordance with a valid air quality license, permit, or parking facility(ies) license, and all general and specific conditions contained therein, including any other requirements under federal, state or local regulations."

By: Operating a source of air pollution without a State of Florida Air Permit.

IMPORTANT HEARING INFORMATION

There will be a Hearing held before the Broward County duly appointed Hearing Examiner at the following location:

**Broward County Government Center West
One North University Drive
Hearing Room - Second Floor
Plantation, Florida**

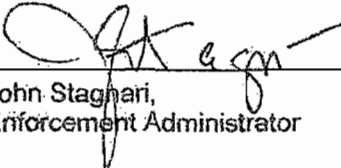
Date: June 26, 2008

Time: Hearings begin at 9:30 a.m. and continue until all cases on the docket are heard.

You may appear and present defenses to the violation(s) charged. The Hearing will take place whether or not you appear unless you make prior arrangements for continuance pursuant to section 27-31 of the Broward County Code. You may be represented by an attorney at the Hearing. After hearing the evidence, the Hearing Examiner may assess a Civil Penalty of up to \$15,000.00 per violation per day and may assess administrative costs associated with the Notice of Violation. You may request a Settlement Conference at least five (5) days prior to the scheduled Hearing to discuss compliance and the amount of penalty and costs to be assessed.

If you have any questions or wish to schedule a Settlement Conference, please contact Mark Gerberding at (954) 519-1481.

If, due to a disability, you require accommodation or auxiliary services to attend this Hearing or a Settlement Conference, please call to make a request within 48 hours of the Hearing or Conference.



John Stagnari,
Enforcement Administrator

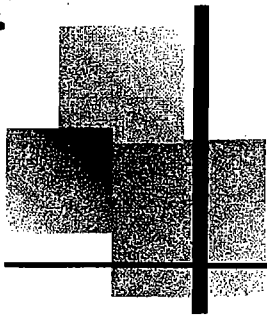
Date: 5/19/08

Registered Agent(s)/Mailed To:

Charles G. Rogers, Jr.
(for Survival Products, Inc.)
5614 S.W. 25th Street
Hollywood, FL 33023

RRR: 7003 1010 0003 0952 9141

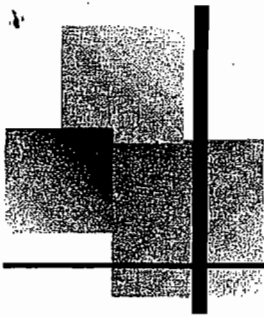
C: Department of Environmental Protection, S.E. Florida District - West Palm Beach
Daphne E. Jones, Assistant County Attorney
Daniela Banu
Cynthia Fernandez



SURVIVAL PRODUCTS

NOV

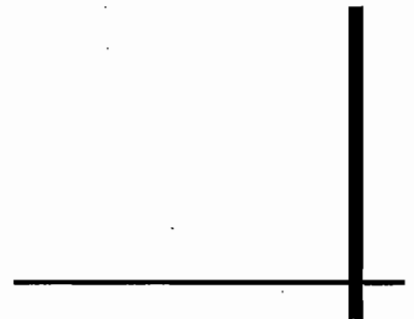




SECTION A

Content:

- Notice of Violation Request
- Case Summary
- Checklist for Issuance of NOV



Notice of Violation Request

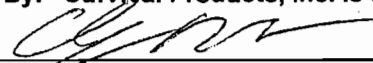
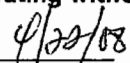
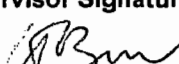
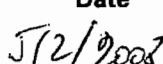
Division/Section: Air Quality / Licensing & Compliance
Inspector(s): Cynthia Fernandez
Violation Date: November 9, 2007 **Violation Time:** 930
Violation End Date:
Multiple Dates:
Respondent List: Survival Products, Inc. - Phone: (954) 966-7329
Location of Violation: 5614 SW 25TH ST
Hollywood, FL 33023

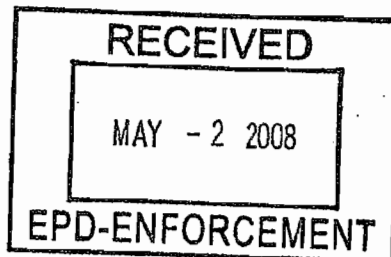
VIOLATION LIST

Code Section Number: 27-175(a) Air Quality: General Prohibitions

Which States: "Unless otherwise authorized by this article, no owner or operator shall construct or operate any source of air pollution, including parking facility(ies), except in accordance with a valid air quality license, permit, or parking facility(ies) license, and all general and specific conditions contained therein, including any other requirements under federal, state or local regulations."

By: Survival Products, Inc. is operating without a State of Florida Air Permit.

 _____ Supervisor Signature	 _____ Date	_____ Enforcement Staff Assigned	
 _____ Division Director Signature	 _____ Date	_____ Enforcement Administrator Signature	_____ Date



CASE SUMMARY

Registered Agent: Charles G. Jr, Roger

Mailing Address: 5614 S.W. 25TH ST
HOLLYWOOD FL 33023

Facility: Survival Products, Inc.

Location: 5614 S.W. 25TH ST.
Hollywood, FL 33023

Operation: Manufacture of survival emergency equipment. The facility uses adhesives containing HAPs, which makes the operation subject to state regulations.

Investigator: Cynthia V. Fernandez

Violation: Survival Products, Inc. is operating without a valid State of Florida Air Permit.

History:

09/19/2007 Air Quality Division (AQD) conducted an inspection; as part of the Un - Permitted facilities inspection program. During the inspection the division had grounds to believe that the facility requires a state permit.

09/25/2007 AQD issued a Notification of Potential Enforcement Action letter to Survival Products requiring more information about the facility operation (Attachment # 1).

10/10/2007 AQD faxed to Survival Products, as requested, by Survival a copy of Chapter 27 Article I, Division 5, Section 27 - 54, and Article IV Section 27-176 (a)(3) of the Broward County Code of Ordinances.

10/31/2007 AQD received a reply letter from Survival Products which AQD deemed to be incomplete (Attachment # 2).

11/09/2007 AQD conducted a site visit; J. Cisneros, C. Bittle and C. Fernandez were present and met with Mr. Charles Rogers and conducted a walk

through of the facility. The inspection concluded that a permit is required.

11/15/2007

AQD issued a letter to follow up the inspection and requesting clarification and documentation regarding operation (Attachment # 3).

11/19/2007

J. Cisneros, AQD, emailed Mr. Rogers, as requested by him, the Florida Administrative Code of Regulations (Attachment # 4). To date Survival Products, Inc. has not submitted the requested information.

01/25/2008

AQD issued NOV Warning Notice # 08-0031 for operating without a State of Florida Air Permit (Attachment # 5). A permit application was included with the WN. To date Survival Products has not responded to the corrective action.

04/10/2008

Notice of Violation (NOV) requested for Division enforcement action.

CHECKLIST FOR ISSUANCE OF A NOTICE OF VIOLATION

Name of Case: Survival Products, Inc.

Name of NOV Requestor: Cynthia Fernandez

- 1. Corporate Information Check Form Y / N
- 2. Name of Registered Agent, if available Y / N
- 3. Occupational License Check Form Y / N
- 4. Location of Violation clearly stated Y / N
- 5. Legal Property Search and Copy of Deed Y / N
- 6. Complete copies of Licenses Y / N
- 7. Statement of Facts, i.e. case summary, dates and times of inspections and investigations, witnesses, complaints, etc. Y / N
- 8. Copies of Correspondence Y / N
- 9. Original photographs (individually labeled and neatly mounted). Y / N
- 10. Site Sketch Y / N
- 11. Original Laboratory reports Y / N
- 12. Is violation a citationable offense? Y / N
If yes, does violation warrant an NOV? Y / N
- 13. Does violation warrant a Warning Notice according to Division SOP? Y / N
- 14. Any other applicable information Y / N

I have reviewed this case and I am satisfied with the level of preparation and presentation of evidence for the NOV request to be substantiated.

Cynthia Fernandez
Witness / Requestor

05/07/08
Date

[Signature]
Section Manager

4/22/08
Date

[Signature]
Division Director

05/07/08
Date

DATE:

CASE NUMBER: _____

CONDUCTED BY:

DPEP ID#: _____

TOWNSHIP:

RANGE:
SECTION: _____

FOLIO NUMBER: _____

O.R. BOOK: _____ PAGE
NUMBER: _____

PROPERTY ADDRESS: _____

LEGAL DESCRIPTION: _____

OWNER:

This may or may not be the person listed in the Property Appraiser's records. A copy of the property deed is required to verify ownership.

ADDRESS: _____

PROPERTY VALUE: \$

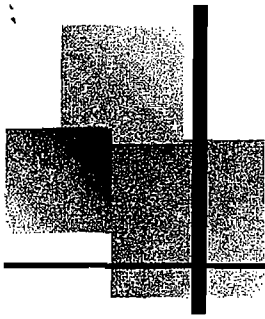
USE: _____

BUILDING VALUE: \$

MILL: _____

TOTAL VALUE: \$ _____

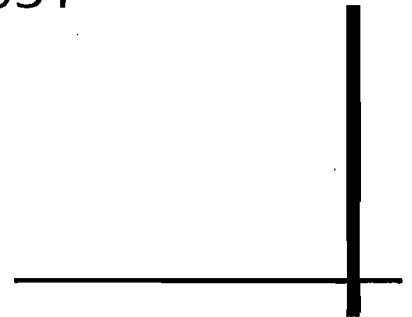
COMMENTS: _____



SECTION B

Content:

- Corporate Search
- AOD Notification of Potential Enforcement Action Letter
- Survival Products Letter
- AOD Follow up letter
- AOD Email to Survival
- AOD: Warning Notice, 08–0031





[Home](#)

[Contact Us](#)

[E-Filing Services](#)

[Document Searches](#)

[Forms](#)

[Help](#)

[Previous on List](#)

[Next on List](#)

[Return To List](#)

No Events

No Name History

Detail by Entity Name

Florida Profit Corporation

SURVIVAL PRODUCTS INC

Filing Information

Document Number 364419
FEI Number 591402677
Date Filed 05/21/1970
State FL
Status ACTIVE

Principal Address

5614 S.W. 25TH ST.
HOLLYWOOD FL 33023

Mailing Address

5614 S.W. 25TH ST.
HOLLYWOOD FL 33023

Registered Agent Name & Address

ROGERS, CHARLES G., JR.
5614 S.W. 25TH ST.
HOLLYWOOD FL 33023

Officer/Director Detail

Name & Address

Title PTD

ROGERS JR., CHARLES G
2801 PALMER DR.
HOLLYWOOD FL

Title VSD

ROGERS, DONNA W
2801 PALMER DR.
HOLLYWOOD FL

Annual Reports

Report Year Filed Date

2006	02/13/2006
2007	04/23/2007
2008	03/03/2008

Document Images



ENVIRONMENTAL PROTECTION DEPARTMENT - Air Quality Division
Mailing Address: 115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301
954-519-1220 • FAX 954-519-1495

**NOTIFICATION OF POTENTIAL
ENFORCEMENT ACTION**

September 25, 2007

Survival Products, Inc.
Mr. David Miller, Director of Engineering
5614 SW 25th Street
Hollywood, FL 33023

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Mr. Miller:

The Environmental Protection Department (EPD), Air Quality Division conducted a compliance inspection of your facility on September 19, 2007. We understand that the facility manufactures survival emergency equipment such as life rafts and other. Based on results of the compliance inspection, EPD has grounds to believe and does believe that the facility may be in violation of Chapter 27 of the Broward County Code of Ordinances, Section 27-54 and 27-176(3), for operating without an appropriate air permit.

EPD requests that Survival Products, Inc. provide the following information no later than **October 31, 2007**:

1. An explanation of facility operations including all pollution emitting equipment and disclosure of all coating products used during daily operation.
2. Monthly records of all coatings utilized during manufacturing, finishing and cleaning operations including any and all paints, solvents, thinners, sealers, contact cements, varnishes, adhesives, activators, accelerators, etc., for the past 3 calendar years (2004 to present).
3. Material Safety Data Sheets for all coating products used.
4. Facility potential to emit volatile organic compounds (VOCs) and hazardous air pollutant (HAP) emissions (in tons per year), from all facility operations based on a maximum operating scenario and maximum hours of operation.

Please provide the necessary information by the indicated deadline. Based on the September 19th inspection and the information requested in this letter, EPD will make a determination as to air permit applicability and whether enforcement action is warranted. Should you have any questions, please do not hesitate to contact Ms. Josie Cisneros of the Air Quality Division at 954-519-1220.

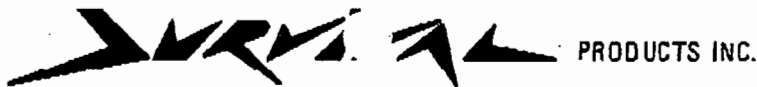
Sincerely,

Clifton R. Bittle
Environmental Licensing Manager
Air Quality Division

Broward County Board of County Commissioners

Josephus Eggelton, Jr. • Sue Gunzburger • Kristin D. Jacobs • Ken Keechl • Ilene Lieberman • Stacy Ritter • John E. Rodstrom, Jr. • Diana Wasserman-Rubin • Lois Wexler
www.broward.org

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301



PRODUCTS INC.

31 October 2007

Subject: Your 25SEP07 Letter

Dear Mr. Bittle:

The following is in response to your 25SEP07 letter and corresponds to the item numbers listed.

1. Survival Products, Inc.(SPI) manufactures emergency life rafts for aviation and marine use. These rafts are constructed of neoprene coated nylon fabric cemented together with neoprene adhesive. The adhesive is thinned and activated using toluene and accelerator.

SPI has been in business over 37 years with most of it at this location. Twenty employees work at this Hollywood address who along with their families depend on their livelihood from their work here. SPI exports a large number of rafts thus favorably affecting the U.S. Export/Import Ratio.

2. Monthly adhesive/accelerator USG purchases are as follows: JUL07(156/5), MAY07(159/5), JAN07(163/5), NOV06(158/5), SEP06(159/5), AUG06(160/0), MAY06(53/0), APR06(106/0), FEB06(106/5), OCT05(108/10), AUG05(107/5), UN05(110/5),MAY05(110/5),APR05(110/0), MAR05(110/0), FEB05(110/10), NOV04(110/5), OCT04(110/0), AUG04(110/5), JUL04(110/5), MAY04(110/0), MAR04(55/0)

Monthly toluene USG purchases are as follows: OCT07(10), AUG07(10), MAY07(10), FEB07(10), OCT06(9), JUL06(10), APR06(10), NOV05(10), JUL05(10), APR05(10), NOV04(10), SEP04(10), MAY04(10), FEB04(10)

Monthly waste toluene/adhesive/accelerator disposal is as follows: OCT07(715), AUG07(10), MAY07(10), FEB07(10), OCT06(9), JUL06(10), APR06(10), NOV05(10), JUL05(10), APR05(10), NOV04(10), SEP04(10), MAY04(10), FEB04(10)

3. Material Safety Data Sheets for the adhesive, accelerator, and toluene are on file at SPI for your examination.
4. Most all of the adhesive, accelerator, and toluene are incorporated into the life rafts during during manufacture or disposed of as waste and therefore air pollution is minimal.

I am faxing this letter to you today and will be mailing it tomorrow. Please feel free to request any further information you might require.

Sincerely,


Charles G. Rogers, Jr.

ENVIRONMENTAL PROTECTION DEPARTMENT – Air Quality Division
Mailing Address: 115 South Andrews Avenue, Room A-240 · Fort Lauderdale, Florida 33301
954-519-1220 · FAX 954-519-1495

November 15, 2007

Survival Products, Inc.
Mr. David Miller, Director of Engineering
5614 SW 25th Street
Hollywood, FL 33023

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Mr. Miller:

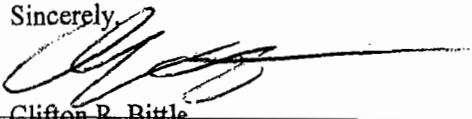
Subsequent to your October 31, 2007 letter responding to the Notice of Potential Enforcement Action, the Environmental Protection Department (EPD), Air Quality Division conducted a second inspection of your facility on November 9, 2007. At the time of our visit we discussed operations at the facility and questions regarding product usage. In addition we toured the facility and its operations, understanding that you manufacture life rafts of various sizes by adhering pieces of Neoprene nylon raw material with a mixture of adhesive and accelerator. Based on results of the second inspection, EPD has grounds to believe that your facility may require a state air permit. Per our second compliance inspection and our initial notice dated September 25, 2007, the following requested information remains incomplete.

EPD requests that you completely respond to the following information no later than **December 15, 2007**:

1. Based on your letter dated October 31, 2007, please clarify the unit of measure for the amounts of monthly adhesive, accelerator and toluene used and wasted. Please indicate whether the amounts are gallons or 55-gal drums.
2. Please explain how much accelerator, adhesive and toluene is utilized on a daily basis.
3. Please explain the % proportion (or amount) of adhesive-to-accelerator mix utilized on a daily basis.
4. From daily product usage rates, number of rafts manufactured per day and maximum hours of operation, please demonstrate the facility operation's potential to emit volatile organic compounds (VOCs) and hazardous air pollutant (HAP) emissions in tons per year. Should you wish, you may retain the services of an environmental consultant or environmental engineer to assist with the emissions calculation.

Please be advised that operating a facility without a necessary air permit is a violation of Chapter 27, Section 27-54 and 27-176(3) of the Broward County Code of Ordinances and Rule 62-210.300 of the Florida Administrative Code. Should you have any questions, please do not hesitate to contact Ms. Josie Cisneros of the Air Quality Division at 954-519-1220.

Sincerely,



Clifton R. Bittle

Environmental Licensing Manager
Air Quality Division

Cisneros, Josefina

From: Cisneros, Josefina
Sent: Monday, November 19, 2007 11:23 AM
To: 'sales@survivalproductsinc.com'
Subject: Florida Administrative Code Regulations (Air permitting)
Attachments: 62-210 FAC.pdf; 62-213 FAC.pdf; Survival Products 2nd Letter.pdf

Attn: Mr. Charles Rogers

Per your request, please see attached Florida Administrative Code Rules for permitting. Under Rule 62-210, please see page 35-44 which describes exemptions from air permitting. Page 42-43 specifically describes the emission exemption levels for either 1) an emission unit or activity or 2) a facility. Under Rule 62-213 FAC, please see page 291 which describe the emissions that would indicate that a facility is a Title V facility with a Title V permit.

Please note we mailed a second letter to your attention (dated November 15th) describing our visit to your facility and addressing the information requested per our visit (see attached). If you have any questions, please contact me or our manager, Mr. Cliff Bittle.

Thank you,

*Josie Cisneros
Natural Resource Specialist II
Environmental Protection Department
Air Quality Division
Mailing Address:
115 S. Andrews Avenue, Room A-240
Fort Lauderdale, FL 33301
Phone: (954) 519-1215
Fax: (954) 519-1495*

11/19/2007



WARNING NOTICE

Page 1 of 2

WARNING NOTICE NUMBER: WRN08-0031

Pursuant to Chapter 27 of the Broward County Code (BCC), the Environmental Protection Department (EPD or Department) has the authority and duty to control and regulate activities and facilities which adversely affect the air, water, soil and other natural resources of Broward County.

The undersigned certifies that he/she has just grounds to believe that on or about November 09, 2007, 0930 hours, at the location below, the following Respondent(s) violated the sections of the Broward County Code identified in each count:

Location: 5614 SW 25TH ST
Hollywood, FL 33023

COUNT 1: Respondent: Survival Products, Inc.

Violated section 27-175(a), BCC, which states:

"Unless otherwise authorized by this article, no owner or operator shall construct or operate any source of air pollution, including parking facility(ies), except in accordance with a valid air quality license, permit, or parking facility(ies) license, and all general and specific conditions contained therein, including any other requirements under federal, state or local regulations."

By: Survival Products, Inc. is operating without a State of Florida Air Permit.

Corrective Action:

Survival Products, Inc. shall complete and submit to the Environmental Protection Department, Air Quality Division, the attached air permit application, along with the application fee within the time framed specified in this notice.

Correct within 60 day(s) of receipt of this notice.

Accordingly, the Respondent(s) is hereby advised to correct and respond to the aforesaid allegation(s) within the time period identified in each count above, or by advising the Department of any circumstances which it believes make this allegation inapplicable.

Failure to comply with this Warning Notice may result in the issuance of a Notice of Violation and a Notice of Hearing to Assess a Civil Penalty. Pursuant to a Notice of Violation, a Civil Penalty in an amount up to \$15,000.00 per violation per day or portion thereof during which the violation occurred may be levied by a Hearing Examiner.

Your response or any questions concerning this Warning Notice should be directed to Cynthia Fernandez at phone: (954) 519-1459, FAX: (954) 519-1495 or email: cfernandez@broward.org.



Daniela Banu, Director

Air Quality Division

Richard G. Wilkins, Department Director

Date: 1/25/2008

Registered Agent/Mailed To:

Charles G. Rogers, Jr., President
Survival Products, Inc.
(for Survival Products, Inc.)
5614 SW 25 ST
Hollywood, FL 33023
RRR: 7003 2260 0005 8981 5231

CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage)
 For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Post	

Sent To: Rogers, Charles
 Survival Products Inc
 5614 SW 25th St
 Hollywood, FL 33023

Street, Apt or PO Box
 City, State

PS Form 3800, June 2002

Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.

- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Rogers, Charles
 Survival Products Inc
 5614 SW 25th St
 Hollywood, FL 33023

2. Article Number
 (Transfer from service label)

Signature: *[Signature]*

Agent
 Addressee

B. Received by (Printed Name): *Lionel Bellamy*

C. Date of Delivery: *11/11/04*

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7003 2260 0005 8981 5231

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

The undersigned certifies that he/she, on this day, at the location below, the following Respondent(s) violated the sections of the Broward County Code identified in each count:

Location: 5614 SW 25TH ST
 Hollywood, FL 33023

COUNT 1: Respondent: Survival Products, Inc.

Violated section 27-175(a), BCC, which states:

"Unless otherwise authorized by this article, no owner or operator shall construct or operate any source of air pollution, including parking facility(ies), except in accordance with a valid air quality license, permit, or parking facility(ies) license, and all general and specific conditions contained therein, including any other requirements under federal, state or local regulations."

By: Survival Products, Inc. is operating without a State of Florida Air Permit.

Corrective Action:

Survival Products, Inc. shall complete and submit to the Environmental Protection Department, Air Quality Division, the attached air permit application, along with the application fee within the time framed specified in this notice.

Correct within 60 day(s) of receipt of this notice.



WARNING NOTICE

WARNING NOTICE NUMBER: WRN08-0031

Pursuant to Chapter 27 of the Broward County Code (BCC), the Environmental Protection Department (EPD or Department) has the authority and duty to control and regulate activities and facilities which adversely affect the air, water, soil and other natural resources of Broward County.

The undersigned certifies that he/she has just grounds to believe that on or about November 09, 2007, 0930 hours, at the location below, the following Respondent(s) violated the sections of the Broward County Code identified in each count:

Location: 5614 SW 25TH ST
Hollywood, FL 33023

COUNT 1: Respondent: Survival Products, Inc.

Violated section 27-175(a), BCC, which states:

"Unless otherwise authorized by this article, no owner or operator shall construct or operate any source of air pollution, including parking facility(ies), except in accordance with a valid air quality license, permit, or parking facility(ies) license, and all general and specific conditions contained therein, including any other requirements under federal, state or local regulations."

By: Survival Products, Inc. is operating without a State of Florida Air Permit.

Corrective Action:

Survival Products, Inc. shall complete and submit to the Environmental Protection Department, Air Quality Division, the attached air permit application, along with the application fee within the time framed specified in this notice.


Correct within 60 day(s) of receipt of this notice.

7003 2260-0005-
8981-5231
Received 2/1/08

Accordingly, the Respondent(s) is hereby advised to correct and respond to the aforesaid allegation(s) within the time period identified in each count above, or by advising the Department of any circumstances which it believes make this allegation inapplicable.

Failure to comply with this Warning Notice may result in the issuance of a Notice of Violation and a Notice of Hearing to Assess a Civil Penalty. Pursuant to a Notice of Violation, a Civil Penalty in an amount up to \$15,000.00 per violation per day or portion thereof during which the violation occurred may be levied by a Hearing Examiner.

Your response or any questions concerning this Warning Notice should be directed to Cynthia Fernandez at phone: (954) 519-1459, FAX: (954) 519-1495 or email: cfernandez@broward.org.



Daniela Banu, Director

Air Quality Division

Richard G. Wilkins, Department Director

Date: 1/25/2008

Registered Agent/Mailed To:

Charles G. Rogers, Jr., President
Survival Products, Inc.
(for Survival Products, Inc.)
5614 SW 25 ST
Hollywood, FL 33023
RRR: 7003 2260 0005 8981 5231

Cisneros, Josefina

From: Cisneros, Josefina
Sent: Monday, November 19, 2007 11:23 AM
To: 'sales@survivalproductsinc.com'
Subject: Florida Administrative Code Regulations (Air permitting)
Attachments: 62-210 FAC.pdf; 62-213 FAC.pdf; Survival Products 2nd Letter.pdf

Attn: Mr. Charles Rogers

Per your request, please see attached Florida Administrative Code Rules for permitting. Under Rule 62-210, please see page 35-44 which describes exemptions from air permitting. Page 42-43 specifically describes the emission exemption levels for either 1) an emission unit or activity or 2) a facility. Under Rule 62-213 FAC, please see page 291 which describe the emissions that would indicate that a facility is a Title V facility with a Title V permit.

Please note we mailed a second letter to your attention (dated November 15th) describing our visit to your facility and addressing the information requested per our visit (see attached). If you have any questions, please contact me or our manager, Mr. Cliff Bittle.

Thank you,

*Josie Cisneros
Natural Resource Specialist II
Environmental Protection Department
Air Quality Division
Mailing Address:
115 S. Andrews Avenue, Room A-240
Fort Lauderdale, FL 33301
Phone: (954) 519-1215
Fax: (954) 519-1495*

11/19/2007



ENVIRONMENTAL PROTECTION DEPARTMENT – Air Quality Division
Mailing Address: 115 South Andrews Avenue, Room A-240 · Fort Lauderdale, Florida 33301
954-519-1220 · FAX 954-519-1495

7003-2260-0005-
8982-0792

November 15, 2007

Survival Products, Inc.
Mr. David Miller, Director of Engineering
5614 SW 25th Street
Hollywood, FL 33023

2nd letter

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Mr. Miller:

Subsequent to your October 31, 2007 letter responding to the Notice of Potential Enforcement Action, the Environmental Protection Department (EPD), Air Quality Division conducted a second inspection of your facility on November 9, 2007. At the time of our visit we discussed operations at the facility and questions regarding product usage. In addition we toured the facility and its operations, understanding that you manufacture life rafts of various sizes by adhering pieces of Neoprene nylon raw material with a mixture of adhesive and accelerator. Based on results of the second inspection, EPD has grounds to believe that your facility may require a state air permit. Per our second compliance inspection and our initial notice dated September 25, 2007, the following requested information remains incomplete.

EPD requests that you completely respond to the following information no later than **December 15, 2007**:

1. Based on your letter dated October 31, 2007, please clarify the unit of measure for the amounts of monthly adhesive, accelerator and toluene used and wasted. Please indicate whether the amounts are gallons or 55-gal drums.
2. Please explain how much accelerator, adhesive and toluene is utilized on a daily basis.
3. Please explain the % proportion (or amount) of adhesive-to-accelerator mix utilized on a daily basis.
4. From daily product usage rates, number of rafts manufactured per day and maximum hours of operation, please demonstrate the facility operation's potential to emit volatile organic compounds (VOCs) and hazardous air pollutant (HAP) emissions in tons per year. Should you wish, you may retain the services of an environmental consultant or environmental engineer to assist with the emissions calculation.

Please be advised that operating a facility without a necessary air permit is a violation of Chapter 27, Section 27-54 and 27-176(3) of the Broward County Code of Ordinances and Rule 62-210.300 of the Florida Administrative Code. Should you have any questions, please do not hesitate to contact Ms. Josie Cisneros of the Air Quality Division at 954-519-1220.

Sincerely,

Clifton R. Bittle

Environmental Licensing Manager
Air Quality Division



17 October 2008

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301

VIA FAX AND MAIL

Subject: Air General Permit Eligibility

Dear Mr. Bittle:


I have not received an answer from you regarding my 21SEP08 letter. I faxed this letter to you on 21SEP08 and called your office on 22SEP08 to confirm you had received it. The lady in your office informed me that you would be out of the office until 26SEP08.

I immediately faxed this letter to Mark Gerberding/AQD. He informed me in a telcon shortly after that this was not his area of expertise and he would pass it on to Josie Cisneros. I was hoping we could resolve this issue and avoid the 25SEP08 Hearing. I still do not have an answer.

The 21SEP08 letter provided the specific criteria for an Air General Permit. My 07SEP08 letter provided the general criteria for an AGP. These two letters substantiate Survival Products eligibility for an AGP instead of a FESOP or Title V Permit.

Your concurrence with Survival Products proposed registration for an AGP is requested. Thank you in advance for your prompt response to this request.

Sincerely,


Charles G. Rogers, Jr.
President

Cisneros, Josefina

From: Gerberding, Mark
Sent: Tuesday, October 07, 2008 3:30 PM
To: Bittle, Clifton; Fernandez, Cynthia; Cisneros, Josefina
Subject: Survival Products, Inc. NOV08-0024

We received the Final Order from the Hearing Examiner today. Survival Products, Inc. was ordered to pay a civil penalty of \$8899.00 plus \$600 in administrative costs for a total of \$9499.00. In addition, Survival Products, Inc. must submit a complete State of Florida Air Permit (long form) within thirty days.

In other words, we got everything we asked for at hearing.

Mark Gerberding, Natural Resource Specialist II
Enforcement Administration
Environmental Monitoring and Enforcement Division
Broward County Environmental Protection and
Growth Management Department
One North University Drive, Plantation, FL 33324-2038
(954)519-1481
(954)519-1493
www.broward.org

Cisneros, Josefina

From: Bowman, Sandy [Sandy.Bowman@dep.state.fl.us]
Sent: Friday, October 03, 2008 3:05 PM
To: Bittle, Clifton
Cc: Cisneros, Josefina; Banu, Daniela; Dibble, Dickson
Subject: RE: Survival Products

Hi Cliff,

I did a very quick check of Dick's in-box and did not see it. We will both be on the look out for it.

Sandy

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Bittle, Clifton [mailto:CBITTLE@broward.org]
Sent: Friday, October 03, 2008 2:37 PM
To: Bowman, Sandy; Dibble, Dickson
Cc: Cisneros, Josefina; Banu, Daniela
Subject: Survival Products

Please let us know if you receive a GP registration from Survival Products in Hollywood, FL. We are awaiting a Final Order involving an enforcement case on permit issues concerning this facility.

Clifton R. Bittle

Environmental Licensing Manager
Pollution Prevention, Remediation and Air Quality Division
Broward County Environmental Protection and Growth Management Department

Mailing Address

115 S. Andrews Avenue, Room A-240
Ft. Lauderdale, FL 33301
Phone: (954) 519-1208
Fax: (954) 519-1495

The Pollution Prevention, Remediation and Air Quality Division values your feedback as a customer. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the PPROAO Customer Survey](#). Thank you.

Cisneros, Josefina

From: Bittle, Clifton
Sent: Friday, October 03, 2008 2:37 PM
To: 'Bowman, Sandy'; Dibble, Dickson
Cc: Cisneros, Josefina; Banu, Daniela
Subject: Survival Products

Please let us know if you receive a GP registration from Survival Products in Hollywood, FL. We are awaiting a Final Order involving an enforcement case on permit issues concerning this facility.

Clifton R. Bittle

Environmental Licensing Manager
Pollution Prevention, Remediation and Air Quality Division
Broward County Environmental Protection and Growth Management Department

Mailing Address

115 S. Andrews Avenue, Room A-240
Ft. Lauderdale, FL 33301
Phone: (954) 519-1208
Fax: (954) 519-1495

The Pollution Prevention, Remediation and Air Quality Division values your feedback as a customer. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the PPRAO Customer Survey](#). Thank you.

Cisneros, Josefina

From: Bittle, Clifton
Sent: Tuesday, September 30, 2008 11:09 AM
To: Banu, Daniela; Cisneros, Josefina
Subject: PE question

I think the following clarifies where a PE is/is not required.

62-4.050 Procedures to Obtain Permits and Other Authorizations; Applications.

- (1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require.
- (2) All applications and supporting documents shall be filed in quadruplicate with the Department.
- (3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, or of a public drinking water supply, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S.; and all final geological papers or documents involving the practice of the profession of geology shall be in accordance with sound professional geological practices pursuant to Chapter 492, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except, when the application is for renewal of an air pollution operation permit at a non-Title V source as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.

Clifton R. Bittle

Environmental Licensing Manager
Pollution Prevention, Remediation and Air Quality Division
Broward County Environmental Protection and Growth Management Department
Mailing Address
115 S. Andrews Avenue, Room A-240
Ft. Lauderdale, FL 33301
Phone: (954) 519-1208
Fax: (954) 519-1495

The Pollution Prevention, Remediation and Air Quality Division values your feedback as a customer. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the PPRAQ Customer Survey](#). Thank you.

2008 SEP 29 PM 3:00

21 September 2008

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301

VIA FAX AND MAIL

Subject: Air General Permit Eligibility

Dear Mr. Bittle:

I feel that Survival Products, Inc. (SPI) is eligible for an Air General Permit (AGP) as substantiated below. Please consider this substantiation carefully.

I assume that you agree with the calculations in my 07SEP08 letter regarding the 10/25 TPY HAP general criteria potential limitations specified in 62-210.310(2)(a)1.. Your Josie Cisneros said in an 08SEP08 telcon that she agreed with them and your 11SEP08 letter did not disagree with them since you only mentioned that the information was incomplete. You did not mention what was incomplete. I assume that you were referring to the 62-210.310(4)(c) calculations which are completed below.

62-210.310(4)(c)2.a. specifies that the total quantity of all VOC's used shall not exceed 44 pounds per day averaged monthly. The dictionary definition of used is expended, consumed, or used up. Therefore the following calculations will consider total purchases less waste disposal. This makes sense since the waste disposal does not contribute to air pollution. Purchase and waste quantities are as specified in my 15NOV07 and 10JUL08 letters.

YEAR 2004 PURCHASES AND WASTE DISPOSAL

2200 USG (Toluene), 605 USG (Adhesive), 15 USG (Accelerator), 2200 USG (Combined Waste)

Conservatively figuring the adhesive and accelerator are 100% VOC's

Total Used VOC's = $2200 + 605 + 15 - 2200 = 620$ USG

Conservatively figuring the maximum VOC density of 7.31 LBS/USG

VOC Total Weight Used = $620(7.31) = 4533.2$ LBS/YR

VOC Weight Used Per Day = $4533.2/260 = 17.5$ LBS

THIS TOTAL VOC PER DAY IS LESS THAN THE 44 POUND LIMITATION SPECIFIED IN 62-210-310(4)(c)2.a..



YEAR 2005 PURCHASES AND WASTE DISPOSAL

1650 USG (Toluene), 765 USG (Adhesive), 35 USG (Accelerator), 1650 USG (Combined Waste)

VOC Weight Used Per Day = 22.5 LBS

THIS TOTAL VOC PER DAY IS LESS THAN THE 44 POUND LIMITATION SPECIFIED IN 62-21-.310(4)(c)2.a..

YEAR 2006 PURCHASES AND WASTE DISPOSAL

1595 USG (Toluene), 742 USG (Adhesive), 15 USG (Accelerator), 1595 USG (Combined Waste)

VOC Weight Used Per Day = 21.3 LBS

THIS TOTAL VOC PER DAY IS LESS THAN THE 44 POUND LIMITATION SPECIFIED IN 62-210.310(4)(c)2.a..

YEAR 2007 PURCHASES AND WASTE DISPOSAL

2200 USG (Toluene), 478 USG (Adhesive), 15 USG (Accelerator), 2365 USG (Combined Waste)

VOC Weight Used Per Day = 9.3 LBS

THIS TOTAL VOC PER DAY IS LESS THAN THE 44 POUND LIMITATION SPECIFIED IN 62-210.310(4)(c)2.a..

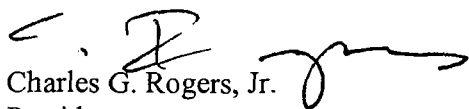
The above calculations indicate that SPI's total quantity of VOC's used per day is below the limitation specified in 62-210.310(4)(c)2.a..

These calculations and those in my 07SEP08 letter indicate that SPI's potential and actual emissions are below those specified in both 62-210.310(2)(a)1. and 62-210.310(4)(c)2.a..

Based on your careful consideration of the above calculations and those in my 07SEP08 letter, SPI proposes to register for an AGP. Your concurrence with this proposed registration for AGP is requested. Please feel free to request any further information you might require.

Your prompt response to this request will be greatly appreciated.

Sincerely,


Charles G. Rogers, Jr.
President

Gerberding, Mark

From: Bittle, Clifton
Sent: Tuesday, September 16, 2008 1:59 PM
To: Fernandez, Cynthia; Gerberding, Mark
Subject: FW: 62-210 Rule Interpretation

9/25/08
hearing
Admissions
into Evidence

FYI re: Survival Products

Clifton R. Bittle
Environmental Licensing Manager
Pollution Prevention, Remediation and Air Quality Division
Broward County Environmental Protection and Growth Management Department
Mailing Address
115 S. Andrews Avenue, Room A-240
Ft. Lauderdale, FL 33301
Phone: (954) 519-1208
Fax: (954) 519-1495

The Pollution Prevention, Remediation and Air Quality Division values your feedback as a customer. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the PPRAO Customer Survey. Thank you.

From: Long, Terri [mailto:Terri.Long@dep.state.fl.us]
Sent: Tuesday, September 16, 2008 1:58 PM
To: Bittle, Clifton; DeAngelo, Gregory
Cc: Cisneros, Josefina; Banu, Daniela
Subject: RE: 62-210 Rule Interpretation

Cliff,

The exemption for fire and safety equipment does not apply to the manufacturer of a product that happens to be a safety product. The exemption is meant to apply to fire suppression systems (halon, fire extinguishers) that are installed at a facility.

Let me know if you have any questions.
Thanks,

Terri Long
Department of Environmental Protection
Division of Air Resource Management, OPAPM
2600 Blair Stone Road
Mail Station 5500
Tallahassee, Florida 32399
terri.long@dep.state.fl.us
850 921-9556
Suncom 291-9556

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Bittle, Clifton [mailto:CBITTLE@broward.org]
Sent: Tuesday, September 16, 2008 8:34 AM
To: Long, Terri; DeAngelo, Gregory
Cc: Cisneros, Josefina; Banu, Daniela

9/22/2008

Subject: 62-210 Rule Interpretation

Terri, Greg.....We have a facility in Broward County that manufacturers inflatable life rafts and emits HAPs as part of the process. The facility believes it is exempt from air permit requirements based on the following exemption in 62-210.300(3)(a)15. We believe this exemption applies to the use of fire and safety equipment and not to its manufacture. What is your interpretation of this exemption?

Thanks, Cliff

(a) Categorical and Conditional Exemptions. Except as otherwise provided at subsection 62-210.300(3), F.A.C., above, the following facilities, emissions units, and pollutant-emitting activities shall be exempt from any requirement to obtain an air construction permit or non-Title V air operation permit, or to use an air general permit pursuant to Rule 62-210.310, F.A.C. The exemptions listed at subparagraphs 62-210.300(3)(a)23. through 36., F.A.C., are valid only if the owner or operator ensures that the conditions of exemption are met.

1. Home heating and comfort heating with a gross maximum heat output of less than one million Btu per hour.
2. Internal combustion engines in boats, aircraft and vehicles used for transportation of passengers or freight.
3. Incinerators in one or two family dwellings or in multi-family dwellings containing four or less family units, one of which is owner-occupied.
4. Noncommercial and nonindustrial vacuum cleaning systems used exclusively for residential housekeeping purposes.
5. Cold storage refrigeration equipment, except for any such equipment located at a Title V source using an

- ozone-depleting substance regulated under 40 C.F.R. Part 82.
6. Vacuum pumps in laboratory operations.
 7. Equipment used for steam cleaning.
 8. Belt or drum sanders having a total sanding surface of five square feet or less and other equipment used exclusively on wood or plastics or their products having a density of 20 pounds per cubic foot or more.
 9. Equipment used exclusively for space heating, other than boilers.
 10. Noncommercial smoke houses used exclusively for smoking food products.
 11. Bakery ovens located at any retail bakery facility which derives at least fifty percent of its revenues from retail sales on premises. Also, bakery ovens located at any commercial bakery facility utilizing only non-conveyor belt ovens operating on a single baking cycle in which a determinate amount of product is cooked at one baking (i.e., batch ovens).
 12. Laboratory equipment used exclusively for chemical or physical analyses.
 13. Brazing, soldering or welding equipment.
 14. Laundry dryers, extractors, or tumblers for fabrics cleaned with only water solutions of bleach or detergents.
 15. Fire and safety equipment.

Clifton R. Bittle

Environmental Licensing Manager

Pollution Prevention, Remediation and Air Quality Division

Broward County Environmental Protection and Growth Management Department

Mailing Address

115 S. Andrews Avenue, Room A-240

Ft. Lauderdale, FL 33301

Phone: (954) 519-1208

Fax: (954) 519-1495

The Pollution Prevention, Remediation and Air Quality Division values your feedback as a customer. Please take a few minutes to comment on the quality of service you received. Simply click on [this link](#) to the PPRAQ Customer Survey. Thank you.



Environmental Protection and Growth Management Department – ENFORCEMENT ADMINISTRATION
Mailing Address: 115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301 • 954-519-1210 • FAX 954-519-1493

**NOTICE OF VIOLATION
and
NOTICE OF HEARING
TO ASSESS A CIVIL PENALTY**

NOTICE OF VIOLATION NUMBER: NOV08-0024

Page 1 of 3

The undersigned certifies that he/she has just grounds to believe that on or about November 09, 2007, 0930 hours, at the location below, the following Respondent(s) violated the section(s) of the Broward County Code (BCC) identified in each count:

Location: 5614 SW 25TH ST
Hollywood, FL 33023

COUNT 1: Respondent: Survival Products, Inc.

Violated section 27-175(a), BCC, which states:

"Unless otherwise authorized by this article, no owner or operator shall construct or operate any source of air pollution, including parking facility(ies), except in accordance with a valid air quality license, permit, or parking facility(ies) license, and all general and specific conditions contained therein, including any other requirements under federal, state or local regulations."

By: Operating a source of air pollution without a State of Florida Air Permit.

IMPORTANT HEARING INFORMATION

There will be a Hearing held before the Broward County duly appointed Hearing Examiner at the following location:

**Broward County Government Center West
One North University Drive
Hearing Room - Second Floor
Plantation, Florida**

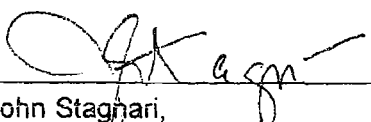
Date: June 26, 2008

Time: Hearings begin at 9:30 a.m. and continue until all cases on the docket are heard.

You may appear and present defenses to the violation(s) charged. The Hearing will take place whether or not you appear unless you make prior arrangements for continuance pursuant to section 27-31 of the Broward County Code. You may be represented by an attorney at the Hearing. After hearing the evidence, the Hearing Examiner may assess a Civil Penalty of up to \$15,000.00 per violation per day and may assess administrative costs associated with the Notice of Violation. You may request a Settlement Conference at least five (5) days prior to the scheduled Hearing to discuss compliance and the amount of penalty and costs to be assessed.

If you have any questions or wish to schedule a Settlement Conference, please contact Mark Gerberding at (954) 519-1481.

If, due to a disability, you require accommodation or auxiliary services to attend this Hearing or a Settlement Conference, please call to make a request within 48 hours of the Hearing or Conference.



John Staghari,
Enforcement Administrator

Date: 5/19/08

Registered Agent(s)/Mailed To:

Charles G. Rogers, Jr.
(for Survival Products, Inc.)
5614 S.W. 25th Street
Hollywood, FL 33023

RRR: 7003 1010 0003 0952 9141

C: Department of Environmental Protection, S.E. Florida District - West Palm Beach

Daphne E. Jones, Assistant County Attorney

Daniela Banu

Cynthia Fernandez

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only. No Insurance Coverage Provided)

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Postage	\$	10408-0024 6/26/08 Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		

SURVIVAL PRODUCTS, INC.
 ATTN.: CHARLES G. ROGERS, JR., PRES.
 5614 SW 25 ST
 HOLLYWOOD, FL 33023

7003 1010 0003 0952 9141

PS Form 3811, February 2004 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p> <input checked="" type="checkbox"/> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. <input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits. </p>	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>Lonel Jeter</i></p> <p>B. Received by (Printed Name) <input type="checkbox"/> Date of Delivery</p> <p><i>Lonel Jeter 6/26/08</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>
<p>1. Article Addressed to:</p> <p>SURVIVAL PRODUCTS, INC. ATTN.: CHARLES G. ROGERS, JR., PRES. 5614 SW 25 ST HOLLYWOOD, FL 33023</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service)</p> <p>7003 1010 0003 0952 9141</p>	



WARNING NOTICE

Page 1 of 2

WARNING NOTICE NUMBER: WRN08-0031

Pursuant to Chapter 27 of the Broward County Code (BCC), the Environmental Protection Department (EPD or Department) has the authority and duty to control and regulate activities and facilities which adversely affect the air, water, soil and other natural resources of Broward County.

The undersigned certifies that he/she has just grounds to believe that on or about November 09, 2007, 0930 hours, at the location below, the following Respondent(s) violated the sections of the Broward County Code identified in each count:

Location: 5614 SW 25TH ST
Hollywood, FL 33023

COUNT 1: Respondent: Survival Products, Inc.

Violated section 27-175(a), BCC, which states:

"Unless otherwise authorized by this article, no owner or operator shall construct or operate any source of air pollution, including parking facility(ies), except in accordance with a valid air quality license, permit, or parking facility(ies) license, and all general and specific conditions contained therein, including any other requirements under federal, state or local regulations."

By: Survival Products, Inc. is operating without a State of Florida Air Permit.

Corrective Action:

Survival Products, Inc. shall complete and submit to the Environmental Protection Department, Air Quality Division, the attached air permit application, along with the application fee within the time framed specified in this notice.

Correct within 60 day(s) of receipt of this notice.

Accordingly, the Respondent(s) is hereby advised to correct and respond to the aforesaid allegation(s) within the time period identified in each count above, or by advising the Department of any circumstances which it believes make this allegation inapplicable.

Failure to comply with this Warning Notice may result in the issuance of a Notice of Violation and a Notice of Hearing to Assess a Civil Penalty. Pursuant to a Notice of Violation, a Civil Penalty in an amount up to \$15,000.00 per violation per day or portion thereof during which the violation occurred may be levied by a Hearing Examiner.

Your response or any questions concerning this Warning Notice should be directed to Cynthia Fernandez at phone: (954) 519-1459, FAX: (954) 519-1495 or email: cfernandez@broward.org.



Daniela Banu, Director

Air Quality Division

Richard G. Wilkins, Department Director

Date: 1/25/2008

Registered Agent/Mailed To:

Charles G. Rogers, Jr., President
Survival Products, Inc.
(for Survival Products, Inc.)
5614 SW 25 ST
Hollywood, FL 33023
RRR: 7003 2260 0005 8981 5231



[Home](#) | [Help](#)

[Track & Confirm](#)

Track & Confirm

Search Results

Label/Receipt Number: **7003 2260 0005 8981 5231**
Status: **Delivered**

Your item was delivered at 1:52 pm on February 01, 2008 in HOLLYWOOD, FL 33023. A proof of delivery record may be available through your local Post Office for a fee.

Additional information for this item is stored in files offline.

[Track & Confirm](#)

Enter Label/Receipt Number.

[Restore Offline Details >](#)



[Return to USPS.com Home >](#)

[Site Map](#)

[Contact Us](#)

[Forms](#)

[Gov't Services](#)

[Jobs](#)

[Privacy Policy](#)

[Terms of Use](#)

[National & Premier Accounts](#)

Copyright© 1999-2007 USPS. All Rights Reserved.

No FEAR Act EEO Data

[FOIA](#)





ENVIRONMENTAL PROTECTION DEPARTMENT – Air Quality Division
Mailing Address: 115 South Andrews Avenue, Room A-240 · Fort Lauderdale, Florida 33301
954-519-1220 · FAX 954-519-1495

November 15, 2007

Survival Products, Inc.
Mr. David Miller, Director of Engineering
5614 SW 25th Street
Hollywood, FL 33023

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Mr. Miller:

Subsequent to your October 31, 2007 letter responding to the Notice of Potential Enforcement Action, the Environmental Protection Department (EPD), Air Quality Division conducted a second inspection of your facility on November 9, 2007. At the time of our visit we discussed operations at the facility and questions regarding product usage. In addition we toured the facility and its operations, understanding that you manufacture life rafts of various sizes by adhering pieces of Neoprene nylon raw material with a mixture of adhesive and accelerator. Based on results of the second inspection, EPD has grounds to believe that your facility may require a state air permit. Per our second compliance inspection and our initial notice dated September 25, 2007, the following requested information remains incomplete.

EPD requests that you completely respond to the following information no later than **December 15, 2007**:

1. Based on your letter dated October 31, 2007, please clarify the unit of measure for the amounts of monthly adhesive, accelerator and toluene used and wasted. Please indicate whether the amounts are gallons or 55-gal drums.
2. Please explain how much accelerator, adhesive and toluene is utilized on a daily basis.
3. Please explain the % proportion (or amount) of adhesive-to-accelerator mix utilized on a daily basis.
4. From daily product usage rates, number of rafts manufactured per day and maximum hours of operation, please demonstrate the facility operation's potential to emit volatile organic compounds (VOCs) and hazardous air pollutant (HAP) emissions in tons per year. Should you wish, you may retain the services of an environmental consultant or environmental engineer to assist with the emissions calculation.

Please be advised that operating a facility without a necessary air permit is a violation of Chapter 27, Section 27-54 and 27-176(3) of the Broward County Code of Ordinances and Rule 62-210.300 of the Florida Administrative Code. Should you have any questions, please do not hesitate to contact Ms. Josie Cisneros of the Air Quality Division at 954-519-1220.

Sincerely,

Clifton R. Ritter

Environmental Licensing Manager
Air Quality Division

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301



PRODUCTS INC.

31 October 2007⁴

Subject: Your 25SEP07 Letter

Dear Mr. Bittle:

The following is in response to your 25SEP07 letter and corresponds to the item numbers listed.

1. Survival Products, Inc.(SPI) manufactures emergency life rafts for aviation and marine use. These rafts are constructed of neoprene coated nylon fabric cemented together with neoprene adhesive. The adhesive is thinned and activated using toluene and accelerator.

SPI has been in business over 37 years with most of it at this location. Twenty employees work at this Hollywood address who along with their families depend on their livelihood from their work here. SPI exports a large number of rafts thus favorably affecting the U.S. Export/Import Ratio.

2. Monthly adhesive/accelerator USG purchases are as follows: JUL07(156/5), MAY07(159/5), JAN07(163/5), NOV06(158/5), SEP06(159/5), AUG06(160/0), MAY06(53/0), APR06(106/0), FEB06(106/5), OCT05(108/10), AUG05(107/5), UN05(110/5),MAY05(110/5),APR05(110/0), MAR05(110/0), FEB05(110/10), NOV04(110/5), OCT04(110/0), AUG04(110/5), JUL04(110/5), MAY04(110/0), MAR04(55/0)

Monthly toluene USG purchases are as follows: OCT07(10), AUG07(10), MAY07(10), FEB07(10), OCT06(9), JUL06(10), APR06(10), NOV05(10), JUL05(10), APR05(10), NOV04(10), SEP04(10), MAY04(10), FEB04(10)

Monthly waste toluene/adhesive/accelerator disposal is as follows: OCT07(715), AUG07(10), MAY07(10), FEB07(10), OCT06((9), JUL06(10), APR06(10), NOV05(10), JUL05(10), APR05(10), NOV04(10), SEP04(10), MAY04(10), FEB04(10)

3. Material Safety Data Sheets for the adhesive, accelerator, and toluene are on file at SPI for your examination.
4. Most all of the adhesive, accelerator, and toluene are incorporated into the life rafts during during manufacture or disposed of as waste and therefore air pollution is minimal.

I am faxing this letter to you today and will be mailing it tomorrow. Please feel free to request any further information you might require.

Sincerely,


Charles G. Rogers, Jr.

11/9/07 Survival Products, Inc.

(Site Visit)

① Purchases of gallons per month.

C. Fernandez

② 5 gal accelerator

J. Cisneros

per 150 gallons ~~accelerator~~

C. Bittle

adhesive

monthly

5 gal pail of adhesive.

③ Waste is 55 gal drums
xistoluene w/ adhesive

④ Toluene activates adhesive.

Neoprene coated nylon is raw material
Continuous process / constant business.

3 coats of cement which is allowed
to dry - the seam is only coated

Sizes 4-12 person size rafts

Seams are brushed on

Hours 7 AM - 3:30 PM M-F; no peak times or seasons

3 coats of cement 30 gallons adhesive to

1 gallon accelerator

done in 5 gal / day pail

1 coat / hr. to 3 coats. dry for 1

Brushed coats

Activate w/ toluene rag

Scrape w/ piddle to get air bubbles out

75% aviation / 25% marine (A)

ENVIRONMENTAL PROTECTION DEPARTMENT - Air Quality Division
 Mailing Address: 115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301
 954-519-1220 • FAX 954-519-1495

**NOTIFICATION OF POTENTIAL
 ENFORCEMENT ACTION**

September 25, 2007

Survival Products, Inc.
 Mr. David Miller, Director of Engineering
 5614 SW 25th Street
 Hollywood, FL 33023

VIA CERTIFIED MAIL
 RETURN RECEIPT REQUESTED

Dear Mr. Miller:

The Environmental Protection Department (EPD), Air Quality Division conducted a compliance inspection of your facility on September 19, 2007. We understand that the facility manufactures survival emergency equipment such as life rafts and other. Based on results of the compliance inspection, EPD has grounds to believe and does believe that the facility may be in violation of Chapter 27 of the Broward County Code of Ordinances, Section 27-54 and 27-176(3), for operating without an appropriate air permit.

EPD requests that Survival Products, Inc. provide the following information no later than **October 31, 2007**:

1. An explanation of facility operations including all pollution emitting equipment and disclosure of all coating products used during daily operation.
2. Monthly records of all coatings utilized during manufacturing, finishing and cleaning operations including any and all paints, solvents, thinners, sealers, contact cements, varnishes, adhesives, activators, accelerators, etc., for the past 3 calendar years (2004 to present).
3. Material Safety Data Sheets for all coating products used.
4. Facility potential to emit volatile organic compounds (VOCs) and hazardous air pollutant (HAP) emissions (in tons per year), from all facility operations based on a maximum operating scenario and maximum hours of operation.

Please provide the necessary information by the indicated deadline. Based on the September 19th inspection and the information requested in this letter, EPD will make a determination as to air permit applicability and whether enforcement action is warranted. Should you have any questions, please do not hesitate to contact Ms. Josie Cisneros of the Air Quality Division at 954-519-1220.

Sincerely,



Clifton R. Bittle
 Environmental Licensing Manager
 Air Quality Division



15 September 2008

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301

VIA FAX AND MAIL

Subject: Air Permit Requirement

Dear Mr. Bittle:

I was going through the Florida Administrative Code today and came across 62-210.300(3), 62-210.300(3)(a), and 62-210.300(3)(a)15. which provide Categorical Exemption from Air Permit Requirements for Safety Equipment Facilities. Survival Products, Inc. is a Safety Equipment Facility.

I had previously requested you consider possible exemption under Life Saving Equipment Facilities which you denied in your 30JUL08 letter. The above indicates that my previous choice of words may not have been well chosen.

I reiterate again that Survival Products Inc.'s ACTUAL EMISSIONS are almost negligible when considering the TOTAL PURCHASES less the WASTE DISPOSAL as indicated in my previous letters to you.

Based on the first paragraph of this letter, please consider this a Request For Exemption from an Air Permit Requirement. Your prompt response to this request will be greatly appreciated.

Sincerely,

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

Charles G. Rogers, Jr.
President

RECEIVED
AIR QUALITY DIVISION
2008 SEP 23 PM 4:40

Broward County EPD Penalty Guidelines for
Air Quality - Chapter 27 Violations

9/22/08

OPERATION WITHOUT A VALID PERMIT OR LICENSE.

Potential for Harm:

Major: 1. Resulted in or has potential for a substantial adverse impact to the public or environment.

Moderate: 1. Resulted in or has potential for a significant adverse impact to the public or environment.

Minor: 1. Resulted in or has potential for a minimal adverse impact to the public or environment.

Extent of Deviation:

Major: 1. Operates without ever having a valid license.

2. Operates with a revoked or suspended license

3. Operates with an expired license 60 days or more of license expiration date.

Moderate: 1. Operates with an expired license for 59 days or less after license expiration date.

Minor: 1. N/A

Cisneros, Josefina

From: Gerberding, Mark
Sent: Monday, September 22, 2008 9:36 AM
To: Bittle, Clifton; Stagnari, John; Cisneros, Josefina; Fernandez, Cynthia
Cc: Jones, Daphne; Brannon, Meredith
Subject: Case Presentation-Survival Products
Attachments: Case Presentation.doc

Please find attached case presentation form for the hearing examiner on Thursday. I would like you to comment specifically on the recommended corrective action portion of the form. For penalty, we are assuming that it is a moderate-major penalty unless Survival Products can demonstrate otherwise to us through their permit application. Do I have the name of application they need to submit correct? Is there anything else we should include? Please comment.

Thanks-

.....
Mark Gerberding, Natural Resource Specialist II
Enforcement Administration
Environmental Monitoring and Enforcement Division
Broward County Environmental Protection and
Growth Management Department
One North University Drive, Plantation, FL 33324-2038
(954)519-1481
(954)519-1493
www.broward.org

CASE PRESENTATION FORM

NOTICE OF VIOLATION NUMBER: NOV08-0024

RESPONDENT: SURVIVAL PRODUCTS, INC.

=====

COUNT 1

VIOLATION DATES: November 9, 2007 to Present

LOCATION OF VIOLATION: 5614 SW 25th Street, Hollywood, Florida

VIOLATED SECTION: 27-175(a), Broward County Code

WHICH STATES: "Unless otherwise authorized by this article, no owner or operator shall construct or operate any source of air pollution, including parking facility(ies), except in accordance with a valid air quality license, permit, or parking facility(ies) license, and all general and specific conditions contained therein, including any other requirements under federal, state or local regulations."

SPECIFICALLY: Operating a source of air pollution without a State of Florida Air Permit.

RECOMMENDED PENALTY: \$ 8899.00

=====

TOTAL RECOMMENDED PENALTY:	\$ 8899.00
ADMINISTRATIVE COSTS:	\$ 600.00
TOTAL:	\$ 9,499.00

=====

RECOMMENDED CORRECTIVE ACTION: Within thirty (30) days of the Final Order, Respondent shall submit a complete State of Florida General Air Permit Application that is acceptable to the Department. If an acceptable application is submitted within thirty (30) days and the Department determines that the permit required is not Title V air permit, then the penalty would be reduce to \$3000.

Assistant County Attorney:	Daphne E. Jones, Esq.
EPGMD Case Manager:	Mark Gerberding, Natural Resource Specialist II
EPGMD Witness:	Cynthia Fernandez, Natural Resource Specialist II
EPGMD Witness:	Josie Cisneros, Natural Resource Specialist II



21 September 2008

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301

VIA FAX AND MAIL

Subject: Air General Permit Eligibility

Dear Mr. Bittle:

I feel that Survival Products, Inc. (SPI) is eligible for an Air General Permit (AGP) as substantiated below. Please consider this substantiation carefully.

I assume that you agree with the calculations in my 07SEP08 letter regarding the 10/25 TPY HAP general criteria potential limitations specified in 62-210.310(2)(a)1.. Your Josie Cisneros said in an 08SEP08 telcon that she agreed with them and your 11SEP08 letter did not disagree with them since you only mentioned that the information was incomplete. You did not mention what was incomplete. I assume that you were referring to the 62-210.310(4)(c) calculations which are completed below.

62-210.310(4)(c)2.a. specifies that the total quantity of all VOC's used shall not exceed 44 pounds per day averaged monthly. The dictionary definition of used is expended, consumed, or used up. Therefore the following calculations will consider total purchases less waste disposal. This makes sense since the waste disposal does not contribute to air pollution. Purchase and waste quantities are as specified in my 15NOV07 and 10JUL08 letters.

YEAR 2004 PURCHASES AND WASTE DISPOSAL

2200 USG (Toluene), 605 USG (Adhesive), 15 USG (Accelerator), 2200 USG (Combined Waste)

Conservatively figuring the adhesive and accelerator are 100% VOC's

Total Used VOC's = 2200 + 605 + 15 - 2200 = 620 USG

Conservatively figuring the maximum VOC density of 7.31 LBS/USG

VOC Total Weight Used = 620(7.31) = 4533.2 LBS/YR

VOC Weight Used Per Day = 4533.2/260 = 17.5 LBS

THIS TOTAL VOC PER DAY IS LESS THAN THE 44 POUND LIMITATION SPECIFIED IN 62-210-310(4)(c)2.a..

Page 2 (21 SEP 08 / C. Bittie)



YEAR 2005 PURCHASES AND WASTE DISPOSAL

1650 USG (Toluene), 765 USG (Adhesive), 35 USG (Accelerator), 1650 USG (Combined Waste)

VOC Weight Used Per Day = 22.5 LBS

THIS TOTAL VOC PER DAY IS LESS THAN THE 44 POUND LIMITATION SPECIFIED IN 62-21-.310(4)(c)2.a..

YEAR 2006 PURCHASES AND WASTE DISPOSAL

1595 USG (Toluene), 742 USG (Adhesive), 15 USG (Accelerator), 1595 USG (Combined Waste)

VOC Weight Used Per Day = 21.3 LBS

THIS TOTAL VOC PER DAY IS LESS THAN THE 44 POUND LIMITATION SPECIFIED IN 62-210.310(4)(c)2.a..

YEAR 2007 PURCHASES AND WASTE DISPOSAL

2200 USG (Toluene), 478 USG (Adhesive), 15 USG (Accelerator), 2365 USG (Combined Waste)

VOC Weight Used Per Day = 9.3 LBS

THIS TOTAL VOC PER DAY IS LESS THAN THE 44 POUND LIMITATION SPECIFIED IN 62-210.310(4)(c)2.a..

The above calculations indicate that SPI's total quantity of VOC's used per day is below the limitation specified in 62-210.310(4)(c)2.a..

These calculations and those in my 07SEP08 letter indicate that SPI's potential and actual emissions are below those specified in both 62-210.310(2)(a)1. and 62-210.310(4)(c)2.a..

Based on your careful consideration of the above calculations and those in my 07SEP08 letter, SPI proposes to register for an AGP. Your concurrence with this proposed registration for AGP is requested. Please feel free to request any further information you might require.

Your prompt response to this request will be greatly appreciated.

Sincerely,

Charles G. Rogers, Jr.
President



Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION
Mailing Address: 115 South Andrews Avenue, Room A-240, Fort Lauderdale, Florida 33301
954-519-1260 • FAX 954-765-4804

September 17, 2008

Mr. Charles Rogers, President
Survival Products, Inc.
5614 SW 25th Street
Hollywood, FL 33023

VIA FAX

RE: Survival Products, Inc. Air Permit Application

Dear Mr. Rogers:

In response to your September 15, 2008 letter, the fire and safety equipment exemption pursuant to Rule Rule 62-210.300(3)(a)15 of the Florida Administrative Code does not apply to the manufacturer of products that happen to be safety products.

Sincerely,

A handwritten signature in black ink, appearing to read "Clifton R. Bittle", written over a horizontal line.

Clifton R. Bittle
Environmental Licensing Manager
Pollution Prevention, Remediation and Air Quality Division

cc: file
Mark Gerberding, Enforcement Administration



ENVIRONMENTAL PROTECTION DEPARTMENT - Air Quality Division
Mailing Address: 115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301
954-519-1220 • FAX 954-519-1495

FAX COVER LETTER

DATE: 9/17/08
TO: Mr. Charles Rogers
FAX No.: 954-966-3584
FROM: Air Quality Division

2 No. of pages including this cover sheet

SUBJECT: See attached letter dated
9/17/08. Original to follow via
regular mail.

Thank You.



Cisneros, Josefina

From: Long, Terri [Terri.Long@dep.state.fl.us]
Sent: Tuesday, September 16, 2008 1:58 PM
To: Bittle, Clifton; DeAngelo, Gregory
Cc: Cisneros, Josefina; Banu, Daniela
Subject: RE: 62-210 Rule Interpretation

Cliff,

The exemption for fire and safety equipment does not apply to the manufacturer of a product that happens to be a safety product. The exemption is meant to apply to fire suppression systems (halon, fire extinguishers) that are installed at a facility.

Let me know if you have any questions.

Thanks,

Terri Long
Department of Environmental Protection
Division of Air Resource Management, OPAPM
2600 Blair Stone Road
Mail Station 5500
Tallahassee, Florida 32399
terri.long@dep.state.fl.us
850 921-9556
Suncom 291-9556

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Bittle, Clifton [mailto:CBITTLE@broward.org]
Sent: Tuesday, September 16, 2008 8:34 AM
To: Long, Terri; DeAngelo, Gregory
Cc: Cisneros, Josefina; Banu, Daniela
Subject: 62-210 Rule Interpretation

Terri, Greg.....We have a facility in Broward County that manufacturers inflatable life rafts and emits HAPs as part of the process. The facility believes it is exempt from air permit requirements based on the following exemption in 62-210.300(3)(a)15. We believe this exemption applies to the use of fire and safety equipment and not to its manufacture. What is your interpretation of this exemption?

Thanks, Cliff

(a) Categorical and Conditional Exemptions. Except as otherwise provided at subsection 62-210.300(3), F.A.C., above, the following facilities, emissions units, and pollutant-emitting activities shall be exempt from any requirement to obtain an air construction permit or non-Title V air operation permit, or to use an air general permit pursuant to Rule 62-210.310, F.A.C. The exemptions listed at subparagraphs 62-210.300(3)(a)23. through 36., F.A.C., are valid only if the owner or operator ensures that the conditions of exemption are met.

1. Home heating and comfort heating with a gross maximum heat output of less than one million Btu per hour.
2. Internal combustion engines in boats, aircraft and vehicles used for transportation of passengers or freight.
3. Incinerators in one or two family dwellings or in multi-family dwellings containing four or less family units, one of which is owner-occupied.
4. Noncommercial and nonindustrial vacuum cleaning systems used exclusively for residential housekeeping purposes.
5. Cold storage refrigeration equipment, except for any such equipment located at a Title V source using an

954-765-4800



15 September 2008

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301

VIA FAX AND MAIL

Subject: Air Permit Requirement

Dear Mr. Bittle:

I was going through the Florida Administrative Code today and came across 62-210.300(3), 62-210.300(3)(a), and 62-210.300(3)(a)15. which provide Categorical Exemption from Air Permit Requirements for Safety Equipment Facilities. Survival Products, Inc. is a Safety Equipment Facility.

I had previously requested you consider possible exemption under Life Saving Equipment Facilities which you denied in your 30JUL08 letter. The above indicates that my previous choice of words may not have been well chosen.

I reiterate again that Survival Products Inc.'s ACTUAL EMISSIONS are almost negligible when considering the TOTAL PURCHASES less the WASTE DISPOSAL as indicated in my previous letters to you.

Based on the first paragraph of this letter, please consider this a Request For Exemption from an Air Permit Requirement. Your prompt response to this request will be greatly appreciated.

Sincerely,

Charles G. Rogers, Jr.
President

RECEIVED
AIR QUALITY DIVISION



PRODUCTS INC.

2008 SEP 12 PM 1:38

07 September 2008

Mr. Clifton R. Bittle
Environmental Licensing Manager
Environmental Protection Department
Air Quality Division
115 S. Andrews Avenue, Room A-240
Ft Lauderdale, FL 33301

VIA FAX AND MAIL

Subject: Your 03 SEP 08 Letter

Dear Mr. Bittle:

First of all, thank you very much for your prompt reply to my 29 AUG 08 letter.

Survival Products, Inc. (SPI) feels that the following calculations utilizing the data provided to your office in my 15NOV08 and 10JUL08 letters and the MSDS'S substantiates SPI's not requiring a state of Florida air permit and therefore no agency action.

YEAR 2004 PURCHASES (MAXIMUM PURCHASE YEAR)

2200 USG (Toluene), 605 USG (Adhesive), 15 USG (Accelerator)

$2200 (7.25) / 2000 = 7.98$ TPY Toluene

$605 (7.18) (.46) / 2000 = 1.00$ TPY Toluene

$605 (7.18) (.34) / 2000 = 0.74$ TPY Adhesive/Hexane

$15 (7.31) (.79) / 2000 = 0.04$ TPY Accelerator/Methanol

Total Toluene = 8.98 TPY, Hexane = 0.74 TPY, Methanol = 0.04 TPY

These totals are less than the 10 TPY and 25 TPY single and combination potential pollutant emissions limitations specified in 62-210.310(2)(a)

YEAR 2005 PURCHASES

1650 USG (Toluene), 765 USG (Adhesive), 35 USG (Accelerator)

Total Toluene = 7.24 TPY, Hexane = 0.94 TPY, Methanol = 0.10 TPY

Page 2 (07 SEP 08 / C. Bittle)

YEAR 2006 PURCHASES

1595 USG (Toluene), 742 USG (Adhesive), 15 USG (Accelerator)

Total Toluene = 7.01 TPY, Hexane = 0.91 TPY, Methanol = 0.04 TPY

YEAR 2007 PURCHASES

2200 USG (Toluene), 478 USG (Adhesive), 15 USG (Accelerator)

Total Toluene = 8.77 TPY, Hexane = 0.58 TPY, Methanol = 0.04 TPY

The above calculations indicate that SPI's potential is below the emissions limitations specified in 62-210.310(2)(a) and therefore SPI will register for an Air General Permit which requires no agency action.

Your careful consideration of the above calculations and concurrence with SPI's proposed registration for an Air General Permit is requested. Please feel free to request any further information you might require.

Sincerely,

Charles G. Rogers, Jr.
President



cc: GEI / Jose Vega
BC-EPD / Mark Gerberding



Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION
Mailing Address: 115 South Andrews Avenue, Room A-240, Fort Lauderdale, Florida 33301
954-519-1260 • FAX 954-765-4804

September 11, 2008

Mr. Charles Rogers, President
Survival Products, Inc.
5614 SW 25th Street
Hollywood, FL 33023

VIA FAX AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: Survival Products, Inc. Air Permit Application

Dear Mr. Rogers:

In response to our telephone conversation on September 10, 2008, although we acknowledge receipt of the information submitted in your faxed letter dated September 7, 2008, the information is incomplete and does not meet the requirement to submit a State of Florida Air Permit Application (Application for Air Permit – Long Form, DEP Form No. 62-210.900(1)) by the deadline of September 8, 2008. The Notice of Violation Hearing for Survival Products, Inc. is scheduled for September 25, 2008. At that time, you will have the opportunity to present your case concerning air permit requirements.

Sincerely,

Clifton R. Bittle
Environmental Licensing Manager
Pollution Prevention, Remediation and Air Quality Division

cc: file

Mr. Jose Vega, Project Manager, GeoTech Environmental & Engineering Consultants
Mark Gerberding, Enforcement Administration



ENVIRONMENTAL PROTECTION DEPARTMENT - Air Quality Division
Mailing Address: 115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301
954-519-1220 • FAX 954-519-1495


FAX COVER LETTER

DATE: 9/11/08
TO: Mr. Charles Rogers
FAX No.: 954-966-3584
FROM: Air Quality Division

2 No. of pages including this cover sheet

SUBJECT: Please see attached letter.

NOTE TO FILE: TELEPHONE RECORD

CALL FROM: Mr. Charles Rogers, Survival Products
SUBJECT: Permit Application 
DATE/TIME: September 10, 2008 10:02 am

Conference call/conversation between C. Bittle, J. Cisneros and Mr. Charles Rogers, President of Survival Products, Inc.

Mr. Rogers called to state he received our faxed letter dated September 9th and wanted to know why we didn't respond whether we agreed or disagreed with his faxed letter dated September 7th with emissions information. He stated he expected a letter as to whether we agree with his numbers and submittal of an air general permit. C. Bittle proceeded to explain that based on the information sent the facility needs a state air permit. Mr. Rogers stated that I had agreed with his calculation via telephone on September 8th. I stated I had reviewed the information and agreed that it represented actual facility emissions AND the numbers represent hazardous air pollutants versus volatile organic compounds. Mr. Rogers stated that it's his belief that he qualifies for an air general permit and not a state air permit. We (both Cliff and I) stated that based on information obtained and since the inception of this entire process, his facility operations necessitate a State Air Permit not a General Permit. He disagreed and insisted that we write and sent him a letter stating that we require and/or need a FESOP application. We stated that to this date he has failed to submit any air permit application and hence why he received our September 9th letter.

Mr. Rogers was very upset and adamant that he disagrees with submitting a state air permit application because he believes his emissions are low enough for a general permit. I attempted to explain the difference between "actual" and "potential-to-emit" emissions but he did not agree nor understand the difference. He vigorously requested that we send him a response letter telling him we are requiring a FESOP. I attempted to explain that the "burden of proof" is on the facility owner to demonstrate facility emissions and permit applicability based on the F.A.C. rules and that I had previously had 2 to 3 lengthy telephone conversations with his hired engineering consultant about Survival Product's air permit process, emissions, engineering calculations, method of calculation, facility chemical usages and operation. Mr. Rogers stated he didn't need a consultant to do anything and that the numbers he provided were his. He further stated again that he wanted a letter from us telling him we are requiring a FESOP. In an effort to end the stalemate, C. Bittle told Mr. Roger that "we would consider his request."





Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION
Mailing Address: 115 South Andrews Avenue, Room A-240, Fort Lauderdale, Florida 33301
954-519-1260 • FAX 954-765-4804

September 9, 2008

Mr. Charles Rogers, President
Survival Products, Inc.
5614 SW 25th Street
Hollywood, FL 33023

VIA FAX AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: Survival Products, Inc. Air Permit Application

Dear Mr. Rogers:

The Pollution Prevention, Remediation and Air Quality Division (PPRAQ) did not receive a State of Florida Air Permit Application for Survival Products, Inc., by the previously extended deadline of September 8, 2008. Please consider this letter a notice that the PPRAQ will continue as scheduled with the Notice of Violation Hearing on September 25, 2008 where you will have the opportunity to state and/or defend your position. Should you have any further questions, please contact the PPRAQ at 954-519-1220.

Sincerely,

A handwritten signature in black ink, appearing to read "Clifton R. Bittle", written over a horizontal line.

Clifton R. Bittle
Environmental Licensing Manager
Pollution Prevention, Remediation and Air Quality Division

cc: file

Mr. Jose Vega, Project Manager, GeoTech Environmental & Engineering Consultants
Mark Gerberding, Enforcement Administration

Broward County Board of County Commissioners

Josephus Eggelton, Jr. • Sue Gunzburger • Kristin D. Jacobs • Ken Keechi • Ilene Lieberman • Stacy Ritter • John E. Rodstrom, Jr. • Diana Wasserman-Rubin • Lois Wexler
www.broward.org

ENVIRONMENTAL PROTECTION DEPARTMENT - Air Quality Division
Mailing Address: 115 South Andrews Avenue, Room A-240 • Fort Lauderdale, Florida 33301
954-519-1220 • FAX 954-519-1495

FAX COVER LETTER

DATE: 9/9/08
TO: Mr. Charles Rogers
FAX No.: 954-966-3584
FROM: BC - Air Quality Division

2 No. of pages including this cover sheet

SUBJECT: Please see attached letter.

