

Environmental Compliance Plan

For

**ENTERA, Inc.
Panama City, FL**

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Introduction

This plan provides necessary information to demonstrate Owner's commitment to operate this facility in compliance with applicable laws and rules specified in DEP Operation Permit.

The Plan was developed in accordance with the unique requirements for this facility and provides management and operators with adequate information and description regarding the design, operation and maintenance features of this facility. The Plan includes information concerning process control and performance evaluation for the facility, as well as equipment and procedural descriptions (including any notification/report requirements of appropriate agencies) for emergency operating conditions. Regular maintenance for plant equipment and monitoring procedures are also included.

This Plan includes the following elements:

1. **Operator Training:** Concerning plant operation permit and other regulatory requirements.
2. **Plant Monitoring:** Establishment and use of parameters to monitor plant operation, such as paint booth Dwyer (pressure differential) gauges and visible emissions from booth exhaust stacks.
3. **Recording of materials used in painting operation(s)** including calculations of resultant air emissions and rolling twelve month totals for such emissions.
4. **Operation and Maintenance Plan:** Establishment and use of a plant specific Operation and Maintenance (O & M) Plan.
5. **Facility Inspections:** Use of periodic facility walk-through inspections by plant staff with specific inspection guidelines, checklists and record keeping.

Corporate Commitment

ENTERA, Inc. adheres to a company-wide environmental program. This program includes an environmental policy, environmental auditing procedures and employee education and involvement.

Operator Training

This Plan represents continuing education program for all plant operators concerning plant operation, permit and other regulatory requirements. A copy of the approved Plan will be available to the operators, maintenance personnel, technicians, and laboratory personnel.

Personnel will be trained to operate facility in accordance to factory training manual and this Plan. Consequently, new employees will be trained within 90 days after commencement of employment and prior to unsupervised equipment operation.

Environmental education is key to maintaining successful environmental stewardship. Education includes new hire orientation and training sessions. During orientation, new hires are educated about the various permits, permit conditions and monitoring requirements.

The training sessions teach management and operating personnel about air emissions control, waste management, spill prevention, air permits and other environmental topics. These training sessions are intended to teach plant management the environmental issues so they, in turn, teach their employees.

Plant operators also get trained on how to read opacity from their stacks which, of course, is very important when operating paint booths. If paint booth is operating properly, there should be no visible emissions coming from the exhaust. Operators need to be trained to observe stack and see if painting should be halted and filters checked. Operators also need to be trained to observe Dwyer pressure gauges daily before commencing painting operation. If gauges are not within specified range, painting should be halted and gauges and filters checked.

Plant Monitoring

This section establishes the use of parameters to monitor plant operation such as pressure differentials and visible emissions. Monitoring also includes recording of materials used on monthly basis and calculation of resulting air emissions. The monitoring will be carried out in the manner as described:

Paint Booths

The performance parameters include such physical, chemical or electrical characteristics as are applicable to the particular paint booth. Such parameters generally include the following indicators:

- Condition of filtering media
- Dwyer gauge reading
- Presence of mist (opacity) from paint booth exhaust stack(s)
- Flow indicators placed on open faces of spray booths which can be gauges developed for that purpose or simple plastic strips hanging atop booth openings

The pressure drop across filters as measured by Dwyer gauges is a useful parameter to monitor paint booth performance. A given paint booth will operate within a certain pressure drop range. The operating range of pressure drop for all five paint booths at this facility are listed on Paint Booth Specification Sheet included in this plan.

Normal operating range for Dwyer gauges is 0.9 to 1.6 for all five booths.

A pressure drop much lower than the lower end of the operating range could indicate:

- Exhaust fan not running
- Filter media failure, holes in filter, or filter misalignment
- Ductwork structural failure

A pressure drop much higher than the upper end of the operating range could indicate:

- Plugged filters

Weekly recording of Dwyer gauge readings on all paint booths and observation of stack gas opacity is conducted by the plant operator, as part of the weekly inspection (see Facility Inspections).

Material Monitoring

Recording of materials used in painting operation and calculations of resultant air emissions will be conducted as follows:

At the beginning of each month, no later than the 10th, calculation of air emissions for previous month will be performed assuming that all VOC and HAP(s) contents in such materials become airborne during painting and are release into atmosphere through exhaust stack(s). Filtering media in paint booths eliminate only liquid mists and/or paint solids in (overspray), but do not capture any of the gases such as VOCs or HAPS. Therefore all contents of VOCs and HAPS as published in manufacturer's MSDS (Material Safety Data Sheet) must be accounted for when calculating air emissions. All HAPS are identified by CAS numbers and up to date list is listed on Florida website www.dep.state.fl.us/air/rules/fac/62-210.pdf under definitions, hazardous air pollutant.

Sample of calculation form is a part of this report. Calculations can also be computer generated.

Summary of calculated VOCs and HAPS will be shown on monthly summary form together with calculation of rolling twelve month totals for each pollutant.

Calculated rolling twelve month totals cannot exceed the following (as specified in DEP Operation Permit):

- 25 tons for VOCs
- 25 tons for Total HAPS
- 10 tons for any individual HAP

Operation and Maintenance Plan

This section establishes a plant specific Operations and Maintenance (O & M) Plan. This element provides reasonable assurance that this facility can be effectively operated and maintained, through reasonable provisions for the operation and maintenance of the facility. Routine maintenance of equipment will be performed as needed to assure optimal operation. The facility shall be operated to control objectionable odors in accordance with Rule 62-296.320(2), F.A.C. Fuels, solvents, lubricants and other maintenance materials shall be stored in approved areas.

This plan includes a schedule for the maintenance and inspection of all the paint booths and Dwyer pressure differential gauges.

The Plan also contains inspection and maintenance schedules including periodic assessments of the condition of filtering media, Dwyer gauges, blowers, electric motors, belts and other equipment associated with operation of paint booths.

Startup of painting operation:

Before commencing:

Check and make sure that all filtering media is in place and in good working order.

Check and make sure that exhaust fan is operating.

Check Dwyer pressure differential gauge(s) and make sure they are in operating range.

Routine maintenance includes:

MONTHLY:

Apply grease to all grease fittings

Adjust all belt tensions

Blow out differential pressure lines

ANNUALLY:

Shut down the plant's operations each year to conduct preventative maintenance procedures

Facility Inspections

This element describes the use of periodic facility “walk-through inspections” by plant staff with specific inspection guidelines. The condition of facility will be noted and compared to its condition during the initial survey and during subsequent inspections.

Daily inspections are made by paint booth operator prior to paint booth startup as described in Startup Procedures to make sure paint booth’s components are in good working order.

Routine observations of the pollution control devices are:

MONTHLY

Inspect integrity of paint booths, filtering media, Dwyer gauges, exhaust fans and stacks

Check fan

Check all belt tensions

ANNUALLY

Check paint booth(s) and other equipment for corrosion

Check all bolts and welds

Check ductwork for buildup of paint residue inside exhaust stack(s) to reduce fire hazard

Records

Records of inspections, maintenance and performance data of paint booths and auxiliary equipment shall be retained for a minimum of five years and shall be made available to DEP upon request. These records are retained at the plant office.

Records requirements shall include:

Weekly Records of paint booth operating parameters

Records of paint booth malfunctions or failures and corrective actions taken

Monthly records of material(s) usage and calculations of resultant air emissions. Also include rolling twelve month emissions totals.

Records of hours of operation for paint booth #1 heater

Periodic Plan Review

This plan will be reviewed at least annually from date of approval. This review will evaluate the effectiveness of the Plan and will make any changes necessary for the Plan to be continuously administered.

The Environmental Compliance Plan shall be updated as operations change, but no less frequently than upon renewal of permit. DEP shall be notified of changes to this plan other than those required for routine maintenance. The Environmental Compliance Plan shall be revised when operational procedures change, to reflect any facility alterations performed or to reflect experience resulting from facility operation. The Company will periodically review and revise the operating protocol, as appropriate, to ensure satisfactory system performance.

Abnormal Events

In the event the Company is temporarily unable to comply with any of the conditions of DEP permit due to breakdown of equipment, power outages, destruction by hazard of fire, wind or other cause, the Company will notify DEP. Notification shall be made in person, by telephone, or other means within 24 hours of breakdown or malfunction. The telephone number to call to notify DEP is **(850) 595-0578**. For emergencies involving a significant threat to human health or the environment, the number is **(850) 320-0519**.

A written report of any noncompliance referenced above shall be submitted to the Florida **Department of Environmental Protection, 160 W. Government St. Room 308, Pensacola, FL 32502-5740**, within 30 days after its occurrence. The report shall describe the nature and cause of the breakdown or malfunction, the steps being taken or planned to be taken to correct the problem and prevent its reoccurrence, emergency procedures in use pending correction of the problem and time when the facility will again be operating in accordance with permit conditions.

If an emergency arises or there is any condition which prevents the continued operation of the emissions control components or results in noncompliance with applicable regulations, the operator will:

Stop painting immediately

Notify Area Superintendent(s), as soon as practically possible, of the time, date and nature of the occurrence and the corrective action(s) taken

Ensure that the emission control components are in good working order before resuming production.

Paint Booth Specification Sheet

Main Paint Booth

Martech Model 50 Series Paint Booth

14'H x 26'L x 14'W

(2) 24" diameter capped stacks overall height is 36'

(1) 24" diameter heat inlet capped stack

The BTU input for the heating unit is max of 1,650,000, min 121,500

The fuel for the heating unit is natural gas at 1000 BTU/cu ft.

Heating unit is 15,000 SCFM against .50 in water column

(2) Dayton 24" Belt Driven Tubeaxial Fans

(20) 2" x 20 ½" x 20 ½" Frontline Green Fiberglass filters

Reading on Dwyer Mark II Nonometer is .90 when new filters are added. Allowed to go to 1.6 before filters have to be changed again. Normally filters are changed weekly.

Open Booth

Martech Paint Booth

10'H x 14'L x 15'W

(1) 36" diameter capped stack overall height is 25'

(1) Dayton 36" Belt Driven Tubearial Fan

(40) 2" x 20 ½" x 20 ½" Frontline Green Fiberglass filters

Reading on Dwyer Mark II Nonometer is .90 when new filters are added. Allowed to go to 1.6 before filters have to be changed again. Normally filters are changed weekly.

Small Closed Interior Booth

Martech Paint Booth

10'H x 25'L x 12'W

(1) 34" diameter capped stack overall height is 24'

(1) Dayton 34" Belt Driven Tubearial Fan

(20) 1" x 20" x 20" Air Cobra Self-Sealing, Internal Wire Frame Ring Panel filters for the doors

(20) 2" x 20 ½" x 20 ½" Frontline Green Fiberglass filters

Reading on Dwyer Mark II Nonometer is .90 when new filters are added. Allowed to go to 1.6 before filters have to be changed again. Normally filters are changed weekly.

Small Exterior Booth

Martech Paint Booth

10'H x 25'L x 12'W

(1) 30" diameter capped stack overall height is 17'

(1) Dayton 30" Belt Driven Tubearial Fan

(40) 2" x 20 ½" x 20 ½" Frontline Green Fiberglass filters

Reading on Dwyer Mark II Nonometer is .90 when new filters are added. Allowed to go to 1.6 before filters have to be changed again. Normally filters are changed weekly.

Mixing Booth

Martech Mixing Booth

8'H x 12'L x 8'W

(2) 2" x 20 ½" x 20 ½" Frontline Green Fiberglass filters

(1) 12" diameter capped stack overall height is 25'

(1) Dayton 12" Belt Driven Tubearial Fan

Forms

ENTERA, Inc.
Panama City, FL

**Production Monthly Log
Including Calculated Emissions**

Month _____ By: _____

Total VOC's _____ tons

Individual HAPS – Name or CAS #

_____	_____ tons
_____	_____ tons
_____	_____ tons
_____	_____ tons
_____	_____ tons
_____	_____ tons
_____	_____ tons
_____	_____ tons
_____	_____ tons

Total HAPS (Sum of all HAPS listed above) _____ tons

Rolling twelve month totals: _____

VOC's _____ tons

Name or CAS #

_____	_____ tons
_____	_____ tons
_____	_____ tons
_____	_____ tons
_____	_____ tons
_____	_____ tons
_____	_____ tons
_____	_____ tons

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Panama City, FL

Paint Booth Operation Log

Date _____ Inspector: _____

Paint Booth	Dwyer Gauge Reading	Opacity Observed*
#1		
#2		
#3		
#4		
#5		

***Opacity (smoke) - Yes or No**