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## PERMITTEE

Palm Harbor Homes, Inc.  
605 South Frontage Road  
Plant City, FL 33563

Air Permit No. 0570369-008-AF  
Effective Date: December 30, 2016  
Renewal Application Due Date: October 31, 2021  
Expiration Date: December 30, 2021

Authorized Representative:  
George Michael Draper, General Manager

Palm Harbor Homes, Inc.  
Hillsborough County, Florida

## PROJECT

This is the final Federally Enforceable State Operation Permit (FESOP), which authorizes the operation of Palm Harbor Homes, Inc., which is a mobile home manufacturing facility (Standard Industrial Classification No. 2451-Mobile Homes). This project is to renew the operating permit. The facility is located in Hillsborough County at 605 South Frontage Road, Plant City, FL 33563. The UTM coordinates are Zone 17-391.80 kilometers (km) East and 3101.50 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

**Permitting Authority:** Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Environmental Protection Commission of Hillsborough County. The Permitting Authority's physical and mailing address is: 3629 Queen Palm Dr., Tampa, Florida 33619. The Permitting Authority's telephone number is 813/627-2600.

**Petitions.** A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number

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## FINAL AIR OPERATION PERMIT

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of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**Effective Date:** This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

**Judicial Review:** Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

  
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Janet L. Dougherty  
Executive Director

**FINAL AIR OPERATION PERMIT**

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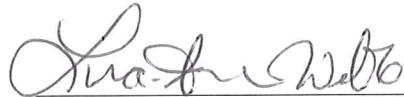
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

George Michael Draper – Palm Harbor Homes, Inc. (mdraper@palmharbor.com)  
Chuck Rogers – Palm Harbor Homes, Inc. (cprogers@palmharbor.com)  
Jennifer Parr – Strata Environmental (jparr@strataenv.com)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
(Clerk)                      12/30/2016  
(Date)

## SECTION 1. GENERAL INFORMATION

### FACILITY DESCRIPTION

Palm Harbor Homes, Inc. is a mobile home manufacturing facility. This manufacturing operation involves a series of processes in which mobile homes are assembled and finished.

The manufacturing starts with the metal frame painting operation. Assembled metal frames are received and are coated by spray gun in a partially enclosed area. The painted frames serve as the foundation and chassis for the mobile homes. The process continues with the construction and installation of exterior/interior walls, floors, ceilings, doors, roofs, electrical, plumbing fixtures, lighting, and appliances. Cabinets are also installed but they are constructed off-site. These operations use a variety of products such as adhesives, cements, fillers, sealants, solvents, surface coatings, specialty coatings, and miscellaneous products.

The facility is subject to VOC-RACT Rule 62-296.513, F.A.C. (Surface Coating of Miscellaneous Metal Parts and Products) for the metal frame painting operation, which limits the VOC content of the coating to 3.5 lb/gal. The facility is a synthetic minor source of VOC and HAPs. VOC emissions from this facility are limited by material usage and low solvent technology. The method of compliance is by implementing good work practices and recordkeeping.

The existing facility consists of the following emissions units (EUs).

EU No.	Emission Unit Description
003	Metal Frame Painting
004	Mobile Home Manufacturing

### APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulations	EU No.
Rule 62-296.513, F.A.C., Metal Frame Painting Operation	003

### FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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FW1. Permitting Authority: The permitting authority for this project is the Environmental Protection Commission of Hillsborough County (EPC). The Permitting Authority's mailing address is: 3629 Queen Palm Dr., Tampa, FL 33619. All documents related to applications for permits to operate an emissions unit shall be submitted to the Environmental Protection Commission of Hillsborough County.

FW2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Environmental Protection Commission of Hillsborough County at: 3629 Queen Palm Dr., Tampa, FL 33619.

FW3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).

FW4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

FW5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

FW6. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the EPC. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

FW7. Renewal. Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Environmental Protection Commission of Hillsborough County. [Rule 62-4.090, F.A.C.]

FW8. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Environmental Protection Commission of Hillsborough County. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]

*{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at [eaor@dep.state.fl.us](mailto:eaor@dep.state.fl.us).}*

FW9. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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FW10. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(185), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rule 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment or major component of such equipment.
- B) Installation or addition of any equipment which is a source of air pollution.
- C) Increase in coating usage beyond the limitations stated in this permits.

FW11. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not limited to, the following:

- A) Maintenance of parking areas and yards.
- B) Removal of particulate matter from paved areas, buildings and work areas under the control of the owner/operator.
- C) All metal frames shall be painted in the partially enclosed station on an impervious surface.
- D) Maintain dust control equipment, located and discharging inside the building, so that no visible emissions occur.

FW12. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit, unless the EPC obtains other information sufficient to demonstrate compliance. The owner or operator of the emissions unit shall provide a report on the results of said tests to the EPC in accordance with the provisions of subsection 62-297.310(10), F.A.C. [Rule 62-297.310(8)(c), F.A.C.]

FW13. As requested by the permittee, in order to limit the potential to emit and establish the facility as a Synthetic Non-Title V Source for both Volatile Organic Compound (VOCs) and Hazardous Air Pollutants (HAP), the following emission limitation shall apply: [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., FESOP No. 0570369-0005-AF]

- A) The maximum volatile organic compound (VOC) emissions from the facility shall not exceed 95.0 tons per twelve consecutive month period.
- B) HAP, as defined in Rule 62-213.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month periods for any individual HAP, and less than 25 tons in any 12 consecutive month periods for the total of all HAPs combined.

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**Mobile Home Manufacturing Operation**

**The following specific conditions apply to the emissions unit(s) listed below:**

<b>EU No.</b>	<b>Emission Unit Description</b>
003	Metal Frame Painting
004	Mobile Home Manufacturing

1. VOC emissions shall not exceed 3.5 pounds per gallon of coating, excluding water, as applied to the metal frame. [Rule 62-296.513, F.A.C., and FESOP No.0570369-005-AF]
2. All the VOC emissions from the mobile home manufacturing that uses a variety of products such as adhesives, cements, fillers, sealants, solvents, surface coatings, specialty coatings, and miscellaneous products shall be included in the facility-wide emissions limitation of Specific Condition No. FW 13. [Rule 62-4.070(3), F.A.C., and FESOP No.0570369-005-AF]
3. The coatings for the metal frames shall be applied as supplied by the coating manufacturer. Mixing or thinning of coatings with other solvents is not allowed. [Rule 62-4.070(3), F.A.C., and FESOP No.0570369-005-AF]
4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]
5. The operating hours for the frame painting and manufacturing operations are not restricted. [Rule 62-4.070(3), F.A.C.]
6. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320, F.A.C.]
  - A) Maintain tightly fitting covers and lids on all containers when they are not being handled/tapped.
  - B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
  - C) Immediately attend to all spills/waste as appropriate.
7. To comply with the emission limitations in Condition No. FW 13 and Specific Condition No. 1, the permittee shall maintain daily and monthly recordkeeping of the operation for the most recent three year period. The records shall be made available to the local, state, or federal air pollution agency upon request. The records shall include, but not limited to the following: [Rule 62-4.070(3) and 62-4.160(14), F.A.C.]
  - A) Day, Month, Year
  - B) Amount of each material/product usage (metal/non-metal), in gallons.
  - C) VOC content of each material used (metal/non-metal), in pounds per gallon.
  - D) VOC emissions for each material used, in pounds.
  - E) HAP emissions for each material used, in pounds.
  - F) MSDS for each material used indicating the VOC (in pounds per gallon), the HAP content (in percent by weight).
  - G) Monthly and twelve month rolling total of 7.B), 7.D) and 7.E) above in tons.

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

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**Mobile Home Manufacturing Operation**

8. Compliance with the emission limitations of Condition No. FW 13 shall be determined using EPA Method 24 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The Department may accept, instead of the coating analysis methods required under Rules 62-296.500(2)(b)2, F.A.C., a certification by the coating manufacturer of the composition of the coating if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings." These records shall be kept on site for each material and made available upon request to the Environmental Protection Commission of Hillsborough County. [Rule 62-296.500(2)(b), F.A.C.]