Department of Environmental Protection

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AUG 02 1996

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Panhandle Marble Company

AIRS I.D. Number: 0910062
Air Permit Number: 0910062 001 AF
Emission Units: 004
Date of Issue: July 31, 1996
Expiration Date: March 31, 2000
County: Okaloosa
Project: Synthetic marble fixtures manufacturing

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 62-296, 62-297 and 62-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of a synthetic marble fixtures manufacturing facility. Styrene based resin mixed with inert fillers is cast and gelcoat is spray applied to forms and molds to manufacture cultered marble and onyx bathroom fixtures and countertops. VOC emissions are dispersed through two exhaust fans and stacks. The first stack is associated with the gelcoat spray booth and was previously identified as source 01; the second stack is associated with the resin casting area and was previously identified as source 02. Particulate emissions are controlled by "good housekeeping" and by vacuum collectors and filters which do not discharge outside the facility.

The facility has the potential to emit up to 23.5 TPY of volatile organic compounds (VOCs), including up to 9.2 TPY of styrene, a hazardous air pollutant (HAP). Styrene emissions include:

gelcoat styrene emissions:	(60,840 lbs/ year) X (0.55 lbs styrene/lb) X (0.35 lbs emitted/lb)
	= 11712 lbs gelcoat styrene/year or 5.86 TPY
resin styrene emissions:	= (702,000 lbs/year) X (0.32 lbs styrene/lb) X (0.03 lbs emitted/lb)
	= 6739 lbs resin styrene or 3.37 TPY
Total styrene emissions:	= 3.37 + 5.86
	= 9.23 TPY or 9.2 TPY

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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Emissions are controlled by limits on hours of operation and on the maximum throughput rates. As a result this permit is a Federally Enforceable State Operating Permit (FESOP), and this facility is considered to be a "synthetic minor" not required to obtain a Title V permit under the provisions of Chapter 62-213, FAC. .

Operation shall be consistent with the construction permits AC46-250619 and AC46-270991, and the operation permit application signed April 19, 1996, and additional information submitted by letter dated May 16, 1996 .

Located: 923 Skipper Avenue, Fort Walton Beach

SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. [FAC Rule 62-4.160]

Operation

2. The maximum allowable operating rate is 225 pounds of resin and 19.5 pounds of gelcoat used per hour. [FAC Rule 62-4.070]

3. The maximum hours of operation are 3120 hours per year based on 10 hours/day, 6 days/week, and 52 weeks per year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually. [FAC Rule 62-4.070 and construction permit application]

4. The Permittee shall replace filters at a pressure differential of 0.1" WG for the gelcoat spray booth, and 0.4" for the resin casting area. These shall be surrogate compliance parameters. (FAC Rule 62-4.070 and applications)

SPECIFIC CONDITIONS:

5. Fugitive emissions shall be controlled using the following procedures as a minimum:
   - All vats, containers, etc., that are used for temporary and permanent storage of VOC/organic solvents shall be covered to prevent vaporization of VOC when not in use.
   - All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of VOC materials.
   - Measures shall be taken to insure that air flow is incoming to the facility when doorways are open. Visible telltales shall be displayed in all doorways to show the direction of air flow.

   [FAC Rule 62-296.320(1)(a)]

Emissions

6. The maximum allowable emission limit for each pollutant is as follows:

Pollutant	FAC Rule	Allowable Emissions
VE	62-297.620(4)	5% opacity
VOCs	62-296.320	23.5 TPY, 15.1 lbs/hour
HAPs	62-296.320	9.2 TPY, 5.9 lbs/hour

9. This source shall be operated in such a fashion so as to preclude objectionable odors. Objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance pursuant to FAC Rule 62-210.200(198)

If the Department determines objectionable odors are being emitted from this facility, the Permittee shall submit within 45 days of receipt of written notification from the Department an odor remediation plan. The plan shall include, but is not limited to, the following:

1. Dispersion modeling analysis to show compliance with ambient acceptable odor threshold value(s).
2. Strategies to reduce odorous chemical utilization or emissions.
3. Modification of manufacturing production cycles.
4. Modification or manufacturing methods.
5. Modification of plant exhaust systems.

[FAC Rule 62-296.320(2)]

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SPECIFIC CONDITIONS:

Testing/Emissions Verification

10. The permittee shall maintain records of materials throughput and usage and of calculated VOC and HAP emissions including monthly totals and monthly hourly averages for a minimum of five years. The calculated HAP emissions shall identify total HAP emissions, styrene, and any other HAPs with emissions in excess of 1000 pounds/year. The records shall be maintained on site for a minimum of five years and made available for Department inspection. (FAC Rule 62-4.070)

11. The permittee shall maintain records of exhaust stack manometer readings in accordance with the approved stack performance monitoring plans for a minimum of five years. The records shall be made available for Department inspection. (FAC Rule 62-4.070 and application)

Administrative

12. An annual operating report for air pollutant emitting facility, DEP Form 62-210.990(5), shall be submitted by March 1 of each year. A copy of the form and instructions may be obtained from the Department of Environmental Protection, Northwest District Air Resources Management Program, (904) 444-8364. [FAC Rule 62-210.370(3)]

13. An application to renew this permit shall be made prior to January 31, 2000. (FAC Rule 62-4.090)

14 . The emission unit covered by this permit is 0910062004. Please cite this number on all test reports and other correspondence specific to this permitted emission unit. [FAC Rule 62-297.310(8)]

15. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 444-8364 during normal working hours. [FAC Rule 62-4.130]

Expiration Date:

March 31, 2000

Issued this 31st day of July, 1996.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Ed K. Middleswart

ED K. MIDDLESWART, P.E.
Air Program Administrator

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

a. Having access to and copying any records that must be kept under the conditions of this permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,

GENERAL CONDITIONS:

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and
b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

GENERAL CONDITIONS:

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.