

Check Sheet

Company Name: MACHO PRODUCTS, INC.  
Permit Number: AC 05-230726  
PSD Number: \_\_\_\_\_  
Permit Engineer: \_\_\_\_\_

**Application:**

- Initial Application
  - Incompleteness Letters
  - Responses
  - Waiver of Department Action
  - Department Response
  - Other

**Cross References:**

- 
- 
- 

**Intent:**

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT Determination
- Unsigned Permit

Correspondence with:

- EPA
- Park Services
- Other

Proof of Publication

- Petitions - (Related to extensions, hearings, etc.)
- Waiver of Department Action
- Other

**Final Determination:**

- Final Determination
- Signed Permit
- BACT Determination
- Other

**Post Permit Correspondence:**

- Extensions/Amendments/Modifications
- Other

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
*Dudley J. Gordon  
 Macho Products, Inc  
 2550 Kirby Ave  
 Palm Bay, FL 32905*

4a. Article Number  
*P 230 524 409*

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
*9/16/93*

5. Signature (Addressee)  
*[Signature]*

6. Signature (Agent)  
*[Signature]*

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 \*U.S. GPO: 1982-323-402 **DOMESTIC RETURN RECEIPT**

P 230 524 409



**Receipt for Certified Mail**

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

PS Form 3800, June 1991

Sent to	<i>Dudley Gordon</i>
Street and No.	<i>Macho Products</i>
P.O., State and ZIP Code	<i>Palm Bay, FL</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>9-14-93</i>
	<i>AC 05 230726</i>

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF PERMIT

In the matter of an  
Application for Permit by:

DER File No. AC05-230726  
Brevard County

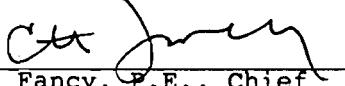
Dudley J. Gordon  
Macho Products, Inc.  
2550 Kirby Avenue  
Palm Bay, Florida 32905

Enclosed is Permit Number AC05-230726 to temporarily increase production of the vinyl dipping operation at the Palm Bay facility, issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 9-14-93 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,  
on this date, pursuant to  
§120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

  
(Clerk)

9-14-93  
(Date)

Copies furnished to:  
C. Collins, CD  
G. Leonard, P.E.

Final Determination

Macho Products, Inc.  
Brevard County  
Palm Bay, Florida

Temporary Production Increase for  
Existing Vinyl Coating Facility  
Permit No. AC 05-230726

Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation

September 7, 1993

## Final Determination

The Technical Evaluation and Preliminary Determination for the permit to temporarily increase production of the vinyl dipping operation at the Macho Products facility in Palm Bay, Brevard County, Florida, was distributed on July 23, 1993. The Notice of Intent to Issue was published in the Florida Today newspaper on August 10, 1993. Copies of the evaluation were available for public inspection at the Department's offices in Orlando and Tallahassee.

No comments were submitted on the Department's Intent to Issue the permit. The final action of the Department will be to issue construction permit AC 05-230726 as proposed in the Technical Evaluation and Preliminary Determination.



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

**PERMITTEE:**  
**Macho Products, Inc.**  
**2250 Kirby Avenue**  
**Palm Bay, Florida 32905**

**Permit Number: AC 05-230726**  
**Expiration Date: July 1, 1994**  
**County: Brevard**  
**Latitude/Longitude: 28°02'21"N**  
**80°35'33"W**

**Project: Temporary Production**  
**Increase for Vinyl**  
**Coating Facility**

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-212 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the temporary increase in solvent consumption from 205.5 tons per year of VOCs to 243.4 tons per year of VOCs. This facility is located in Palm Bay, Brevard County, Florida. The UTM coordinates of this site are Zone 17, 539.8 km E and 3, 101.4 Km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Operate/Construct Air Pollution Sources, DEP Form 17-202(1), received on May 3, 1993.
2. Hopping, Boyd, Green & Sams letter dated May 26, 1993.

PERMITTEE:  
Macho Products, Inc.

Permit Number: AC 05-230726  
Expiration Date: July 1, 1994

**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 403.161, 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. Neither 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 is not 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 or used by the permittee to achieve compliance with the conditions of this permit, as 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.

**PERMITTEE:**  
**Macho Products, Inc.**

**Permit Number: AC 05-230726**  
**Expiration Date: July 1, 1994**

**GENERAL CONDITIONS:**

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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor 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 non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.



PERMITTEE:  
Macho Products, Inc.

Permit Number: AC 05-230726  
Expiration Date: July 1, 1994

**GENERAL CONDITIONS:**

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 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

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.

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 measurements;
- the person responsible for performing the sampling or measurements;
- the dates 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 that 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.

PERMITTEE:  
Macho Products, Inc.


Permit Number: AC 05-230726  
Expiration Date: July 1, 1994

**SPECIFIC CONDITIONS:**

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.
2. The source shall be allowed to operate for up to 4,160 hours per year.
3. VOC emissions from the source shall not be greater than 243.4 tons per year (based on the period from July 1, 1993, through July 1, 1994).
4. No air pollutants shall be discharged which cause or contribute to an objectionable odor.
5. Continuous VOC compliance shall be demonstrated by EPA Method 24, Determination of Volatile Matter Content, 40 CFR 60, Appendix A. The manufacturer's stated VOC content shall be acceptable for the compliance determination if determined by EPA Method 24.
6. This facility shall be permanently closed by July 1, 1994, or upon startup of the permittee's new plant in Indian River county, whichever first occurs. The Department recognizes that notwithstanding the Permittee's best efforts to comply with the commitments in this Specific Condition, events beyond the Permittee's control may prevent or delay the actual startup date of the new plant. Such events include, but are not limited to, natural disasters, contractual or labor difficulties, or administrative proceedings by third parties which delay issuance of any permit needed to undertake the referenced activity or alternative thereto. Should the startup of the new plant be delayed by such causes, the Department shall consider modifying this condition accordingly.

Issued this 13 day  
of September, 1993

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
\_\_\_\_\_  
Howard L. Rhodes, Director  
Division of Air Resources  
Management

Florida Department of  
**Environmental Protection**

**Memorandum**

---

TO: Howard L. Rhodes  
FROM: C. H. Fancy   
DATE: September 7, 1993  
SUBJ: Approval of Construction Permit AC 05-230726  
Macho Products, Inc.

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to temporarily increase production of their vinyl dipping operation in Palm Bay.

This project is not controversial and is required for the facility to remain in operation until their new plant in Indian River County starts up next year.

I recommend your approval and signature.

CHF/JR/bjb

Attachments

Aug 10, 1993

dep810.93

RECEIVED

AUG 16 1993

Division of Air  
Resources Management

Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Tower Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Attn: Mr. John Reynolds

Dear Sirs,

Enclosed please find proof of publication of Notice of Intent to Issue Permit AC 05-230726 for a temporary increase in production rate.

Thanks very much

Sincerely ,



Rick Hathaway  
Systems Manager

cc: J. Reynolds  
A. Zahn, e dist.

CAPE PUBLICATIONS, INC.  
BEST AVAILABLE COPY

The Times

Published Weekly on Wednesday

THE TRIBUNE

Published Weekly on Wednesday



Published Daily

STATE OF FLORIDA  
COUNTY OF BREVARD

Before the undersigned authority personally appeared Sandra N. Thomas who of

oath says that she is Legal Advertising Clerk

of the FLORIDA TODAY, a newspaper published in Brevard County

Florida; that the attached copy of advertising being a LEGAL NOTICE

\_\_\_\_\_ in the matter of MACHO PRODUCTS, INC Notice of Intent to issue a permit

\_\_\_\_\_ in the \_\_\_\_\_ Cour

was published in the FLORIDA TODAY NEWSPAPER

in the issues of AUGUST 10, 1993

Affiant further says that the said FLORIDA TODAY NEWSPAPER

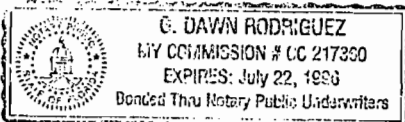
is a newspaper published in said Brevard County, Florida, and that the said newspaper has heretofore been continuously published in said Brevard County, Florida, regularly as stated above and has been entered as second class mail matter at the post office in MELBOURNE

said Brevard County, Florida, for a period of one year next preceeding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

*Sandra N. Thomas*  
(Signature of Affiant)

Sworn to and subscribed before me this 10 day of AUGUST

19 93



*G. Dawn Rodriguez*  
(Signature of Notary Public)

G. DAWN RODRIGUEZ

(Name of Notary Typed, Printed or Stamped)

Personally Known  or Produced Identification

Type of Identification Produced \_\_\_\_\_

ST☆  
Publish

TO: 802911-1T-8/10/1993, Tues  
STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
REGULATION NOTICE OF INTENT TO ISSUE PERMIT  
The Department of Environmental Protection gives notice of its intent to issue a permit to Macho Products, Inc., 2550 Kirby Avenue, Palm Bay, Florida 32905, to temporarily increase the production rate of the vinyl dipping operation at their facility in Palm Bay, Brevard County, Florida. This facility will be permanently closed when the applicant's new plant in Indian River County begins operation by July 1, 1994. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.  
A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 400 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.  
The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.  
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S. and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.  
The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, Bureau of Air Regulation, 111 S. Magnolia Drive, Suite 400, Tallahassee, FL 32301.  
Department of Environmental Protection  
319 Maguire Boulevard  
Suite 232  
Orlando, Florida 32803-3747  
Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

Is your RETURN ADDRESS completed on the reverse side

- Complete items 1 and 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Dudley J. Gordon, Pres.  
 Macho Products, Inc  
 2550 Kirby Ave  
 Palm Bay, FL 32905

4a. Article Number **P230 524 375**

4b. Service Type

<input type="checkbox"/> Registered	<input type="checkbox"/> Insured
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise

7. Date of Delivery **8/28/93**

8. Addressee's Address (Only if requested and fee is paid)

5. Signature (Addressee)  
*J.P. Glennon*

6. Signature (Agent)

PS Form 3811, December 1991 U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 230 524 375



**Receipt for Certified Mail**

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

Sent to	<i>Dudley Gordon</i>
Street and No.	<i>Macho Products</i>
City, State, and ZIP Code	<i>Palm Bay, FL</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>AL 05-230726 7-28-93</i>

PS Form 3800, June 1991



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

July 23, 1993

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Dudley J. Gordon, President  
Macho Products, Inc.  
2550 Kirby Avenue  
Palm Bay, Florida 32905

Dear Mr. Gordon:

Attached are the Technical Evaluation and Preliminary Determination and proposed permit for temporarily increasing the production rate of the vinyl dipping operation at your facility in Palm Bay, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/JR/bjb

Attachments

cc: C. Collins, Central District  
G. Leonard, P.E.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an  
Application for Permit by:

DER File No. AC 05-230726  
Brevard County

Macho Products, Inc.  
2550 Kirby Avenue  
Palm Bay, FL 32905

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INTENT TO ISSUE

The Department of Environmental Protection gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Macho Products, Inc., applied on May 3, 1993, to the Department of Environmental Protection for a permit to temporarily increase the production rate of the vinyl dipping operation at their facility in Palm Bay, Brevard County, Florida. The applicant's facility will be permanently closed when their new plant in Indian River County begins operation by July 1, 1994.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-296 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, Florida Statutes and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit OR Permits. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit OR permits.



The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a

waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399  
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 7-28-93 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**  
FILED, on this date, pursuant to  
§120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

  
Clerk

7-28-93  
Date

Copies furnished to:

C. Collins, Central District  
G. Leonard, P.E.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Protection gives notice of its intent to issue a permit to Macho Products, Inc., 2550 Kirby Avenue, Palm Bay, Florida 32905, to temporarily increase the production rate of the vinyl dipping operation at their facility in Palm Bay, Brevard County, Florida. This facility will be permanently closed when the applicant's new plant in Indian River County begins operation by July 1, 1994. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application have

the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Department of Environmental Protection  
Central District  
3319 Maguire Blvd., Suite 232  
Orlando, Florida 32803-3767

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation  
and  
Preliminary Determination

Macho Products, Inc.  
Brevard County  
Palm Bay, Florida

Temporary Production Increase for  
Existing Vinyl Coating Facility  
Permit No. AC 05-230726

Florida Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation

July 23, 1993

## I. Application Information

### A. Applicant

Macho Products, Inc.  
2550 Kirby Avenue N.E.  
Palm Bay, Florida 32905

### B. Request

The Department received an application on May 3, 1993, for a permit to increase the production rate of the existing vinyl dipping facility in Palm Bay, Brevard County, Florida. The application was deemed complete on June 3, 1993.

### C. Location/Classification

The applicant's martial arts equipment manufacturing facility (SIC Code 3949) is located in Palm Bay at latitude and longitude of 28°02'21"N and 80°35'33"W, respectively. UTM coordinates of the site are Zone 17, 539.8 km E and 3101.4 km N.

## II. Project Description/Emissions

The applicant currently operates a martial arts equipment manufacturing plant in a leased building in which foam-covered sparring gear are dip-coated with a vinyl material. The uncontrolled vinyl dipping process presently emits about 206 tons of VOCs per year. In June, 1989, the applicant applied for a construction permit to install a ventilation duct system for removal of VOCs from the work areas. The Department issued the permit in November, 1989, under the condition that either a VOC pollution control device be installed or the process be converted to water-based technology by January 1, 1993. In February, 1992, the permit was amended to require installation of one of the options by July 1, 1994. After investigating conversion to water-based technology, the applicant decided in 1992 to relocate and build a state-of-the-art facility with a VOC pollution control device. The applicant recently obtained a construction permit to relocate the plant to a site in Indian River County. The new facility will have state-of-the-art emission controls and is scheduled to be completed by July 1, 1994. Requested for the current site is an increase to about 243 tons of VOCs per year based on operation at the present site only until the new plant begins operation, or no later than July 1, 1994. Therefore, this request is for a temporary increase in allowable emissions which will expire on July 1, 1994, or when the new plant begins operation.

## III. Rule Applicability

The permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-296 and 17-4. The facility is located in an area classified as attainment for all of the regulated air pollutants. Applicable rules are F.A.C. Rule 17-212.300, Sources Not Subject to Prevention of Significant Deterioration

or Nonattainment Requirements and F.A.C. Rule 17-296.320, General Pollutant Emission Limiting Standards.

IV. Conclusion

Based on the information provided by Macho Products, Inc., the Department has reasonable assurance that the proposed modification, as described in this evaluation and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of the air pollution rules of the Florida Administrative Code.



A handwritten signature in black ink is written over a circular official seal. The seal contains the text "FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION" around the perimeter and "STATE OF FLORIDA" in the center. The signature is written in a cursive style and appears to read "J. [unclear]".



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

**PERMITTEE:**  
Macho Products, Inc.  
2250 Kirby Avenue  
Palm Bay, Florida 32905

**Permit Number:** AC 05-230726  
**Expiration Date:** July 1, 1994  
**County:** Brevard  
**Latitude/Longitude:** 28°02'21"N  
80°35'33"W

**Project:** Temporary Production  
Increase for Vinyl  
Coating Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-212 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the temporary increase in solvent consumption from 205.5 tons per year of VOCs to 243.4 tons per year of VOCs. This facility is located in Palm Bay, Brevard County, Florida. The UTM coordinates of this site are Zone 17, 539.8 km E and 3, 101.4 Km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Operate/Construct Air Pollution Sources, DEP Form 17-202(1), received on May 3, 1993.
2. Hopping, Boyd, Green & Sams letter dated May 26, 1993.



PERMITTEE:  
Macho Products, Inc.

Permit Number: AC 05-230726  
Expiration Date: July 1, 1994

**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 403.161, 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. Neither 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 is not 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 or used by the permittee to achieve compliance with the conditions of this permit, as 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.

PERMITTEE:  
Macho Products, Inc.

Permit Number: AC 05-230726  
Expiration Date: July 1, 1994

**GENERAL CONDITIONS:**

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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor 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 non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:  
Macho Products, Inc.

Permit Number: AC 05-230726  
Expiration Date: July 1, 1994

**GENERAL CONDITIONS:**

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 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

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.

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 measurements;
- the person responsible for performing the sampling or measurements;
- the dates 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 that 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.

PERMITTEE:  
Macho Products, Inc.

Permit Number: AC 05-230726  
Expiration Date: July 1, 1994

**SPECIFIC CONDITIONS:**

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.
2. The source shall be allowed to operate for up to 4,160 hours per year.
3. VOC emissions from the source shall not be greater than 243.4 tons per year (based on the period from July 1, 1993, through July 1, 1994).
4. No air pollutants shall be discharged which cause or contribute to an objectionable odor.
5. Continuous VOC compliance shall be demonstrated by EPA Method 24, Determination of Volatile Matter Content, 40 CFR 60, Appendix A. The manufacturer's stated VOC content shall be acceptable for the compliance determination if determined by EPA Method 24.
6. This facility shall be permanently closed by July 1, 1994, or upon startup of the permittee's new plant in Indian River county, whichever first occurs. The Department recognizes that notwithstanding the Permittee's best efforts to comply with the commitments in this Specific Condition, events beyond the Permittee's control may prevent or delay the actual startup date of the new plant. Such events include, but are not limited to, natural disasters, contractual or labor difficulties, or administrative proceedings by third parties which delay issuance of any permit needed to undertake the referenced activity or alternative thereto. Should the startup of the new plant be delayed by such causes, the Department shall consider modifying this condition accordingly.

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1993

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**

\_\_\_\_\_  
Howard L. Rhodes, Director  
Division of Air Resources  
Management

# HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

FAX (904) 681-2964

May 26, 1993

C. ALLEN CULP, JR.  
JONATHAN S. FOX  
JAMES C. GOODLETT  
GARY K. HUNTER, JR.  
DALANA W. JOHNSON  
RICHARD W. MOORE  
ANGELA R. MORRISON  
MARIBEL N. NICHOLSON  
LAURA BOYD PEARCE  
GARY V. PERKO  
MICHAEL P. PETROVICH  
DOUGLAS S. ROBERTS  
JULIE B. ROME  
KRISTIN C. RUBIN  
CECELIA C. SMITH

OF COUNSEL  
W. ROBERT FOKES

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JAMES S. ALVES  
BRIAN H. BIBEAU  
KATHLEEN BLIZZARD  
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WILLIAM L. BOYD, IV  
RICHARD S. BRIGHTMAN  
PETER C. CUNNINGHAM  
RALPH A. DeMEO  
THOMAS M. DeROSE  
WILLIAM H. GREEN  
WADE L. HOPPING  
FRANK E. MATTHEWS  
RICHARD D. MELSON  
WILLIAM D. PRESTON  
CAROLYN S. RAEPPLE  
GARY P. SAMS  
ROBERT P. SMITH  
CHERYL G. STUART

Clair Fancy, Chief  
Bureau of Air Regulation  
Florida Department of Environmental  
Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Permit No. AC05-166484

Dear Clair:

Earlier this month, Macho Products, Inc. filed with the Department an application to modify the referenced air construction permit. Please accept this letter as an addendum to that previous permit modification request. More specifically, this letter is to request that the following underscored language be added to Specific Condition No. 4 in Permit No. AC05-166484:

4. One of the following steps must be carried out before July 1, 1994:
  - a. installation of a state-of-the-art pollution control device limiting VOC emissions to 10.0 lbs per hour (based on 95% efficiency); 80 lbs per day (30 day average).
  - b. conversion to a water-based or low solvent content coating approved by the Bureau of Air Regulation.

The Department recognizes that notwithstanding the Permittee's best efforts to comply with the commitments in this Specific Condition, events beyond the Permittee's control may prevent or delay one or more phases of the actual completion date. Such events include, but are not limited to, natural disasters, contractual or labor difficulties, or administrative proceedings by third parties which delay issuance of any permit needed to undertake the referenced activity or alternative thereto. Should implementation of the referenced requirements, or an alternative thereto, be delayed by such causes, the

RECEIVED  
MAY 27 1993  
Division of Air  
Resources Management

Mr. Clair Fancy  
May 26, 1993  
Page 2

Permittee's performance shall be excused for a period of time necessary to remedy the effects thereof.

The rationale for this requested modification is simply to address the possibility of delay caused by circumstances substantially beyond the control of the permittee. Please be assured that Macho Products, Inc. is committed to taking all reasonable steps to maximize the possibility that it will never be necessary to invoke this proposed language.

Please give me a call if you have any questions or concerns regarding this request.

Very truly yours,

*James S. Alves / kkm*

James S. Alves

/kkm

cc: John Reynolds



MACHO PRODUCTS, INC.

April 28, 1993

Mr. John Reynolds  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Tower Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED  
DER - MAIL ROOM  
1993 MAY - 3 PM 12: 00

Dear Mr. Reynolds,

Please find enclosed an Application for Permit Modification and the fee of \$2,000.

This Application for Modification is necessitated by demand and by the fact that we will not be able to obtain the permit for our new factory and bring it into operation by fall of this year.

We appreciate your help in these matters.

Sincerely,

Rick Hathaway  
Systems Manager

RH;jq

Enclosure

cc: J. Reynolds  
A. Zahn, CDist

MACHO PRODUCTS, INC.  
OPERATING ACCOUNT

2550 KIRBY AVE. N.E. 407-729-6137  
PALM BAY, FL 32905

1970

April 28 19 93

63-643/670  
Branch 583

PAY TO THE ORDER OF Florida Department of Environmental Regulation \$ 2000<sup>00</sup>/<sub>100</sub>

Two thousand and <sup>00</sup>/<sub>100</sub> DOLLARS

**FIRST UNION**  
First Union National Bank  
of Florida  
Sebastian, Florida 32958

R. Hathaway

FOR fee for processing permit modification Allen Glenn

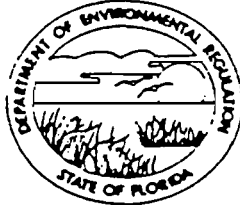
17-4,050



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

#2,000pd  
5-3-93  
Rept.#180854

TWIN TOWERS OFFICE BUILDING  
1600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



AC 05-230726

BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Vinyl Dipping Operation [ ] New<sup>1</sup> [X] Existing<sup>1</sup>

APPLICATION TYPE: [ ] Construction [ ] Operation [X] Modification

COMPANY NAME: Macho Products, Inc. COUNTY: Brevard

Identify the specific emission point source(s) addressed in this application (i.e. Line  
Main Plant Process  
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Ventilation Exhaust

SOURCE LOCATION: Street 2550 Kirby Avenue, N.E. City Palm Bay

UTM: East 539,775 North 3,101,430

Latitude 28 ° 02 ' 21 "N Longitude 80 ° 35 ' 33 "W

APPLICANT NAME AND TITLE: Dudley Gordon, President

APPLICANT ADDRESS: As above

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Macho Products, Inc.

I certify that the statements made in this application for a modification permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: [Signature]  
MACHO PRODUCTS, INC

Dudley Gordon, President  
Name and Title (Please Type)

Date: 4/28/93 Telephone No. (407) 729-6137

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

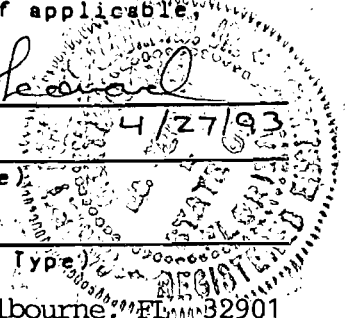
See Florida Administrative Code Rule 17-2.100(57) and (104)

DER Form 17-1.202(1)

Effective November 30, 1982

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed G. Douglas Leonard  
G. Douglas Leonard, P.E.  
Name (Please Type)  
Geraghty & Miller, Inc.  
Company Name (Please Type)  
1801 Penn Street, Suite 7, Melbourne, FL 32901  
Mailing Address (Please Type)



Florida Registration No. 42635 Date: 4/27/93 Telephone No. (407) 951-2931

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

This project involves the production of protective martial arts equipment. The equipment is composed of foam material that is pre-cut to size and hand glued, heated through a glue dryer, and allowed to dry. The products are then dipped into a vinyl paint coating, slow dried through a dryer, and then allowed to air dry. Emissions from the glue and paint system are vented to the atmosphere.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction July 1989 Completion of Construction July 1994\*

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

No pollution control devices are used. As soon as a new air permit is obtained, a new factory designed for effective capture and reduction of emissions will be built. The permit application was submitted in January 1993.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Existing construction permit is included as Appendix A.

\* See Appendix A



SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Glue (MEK)	VOC	85	6.9	See Figure 1
MEK	VOC	100	67.9	See Figure 1
Toluene	VOC	100	45.2	See Figure 1

Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 115.5 lb/hr

2. Product Weight (lbs/hr): n/a

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission <sup>1</sup>		Allowed <sup>2</sup> Emission Rate per Rule 17-2	Allowable <sup>3</sup> Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Glue (MEK)	6.9	14.4					Figure 1
MEK	67.0	137.4					
Toluene	44.6	91.6					
VOCs (total)	118.5	243.4					

<sup>1</sup>See Section V, Item 2.

<sup>2</sup>Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard.

<sup>4</sup>Emission, if source operated without control (See Section V, Item 3).

Values based on estimated annual emission rates; maximum values are approximately two times the average values presented. Calculation of the average values are presented in Appendix B.

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
n/a				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

\*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: \_\_\_\_\_ Percent Ash: \_\_\_\_\_

Density: \_\_\_\_\_ lbs/gal Typical Percent Nitrogen: \_\_\_\_\_

Heat Capacity: \_\_\_\_\_ BTU/lb \_\_\_\_\_ BTU/gal

Other Fuel Contaminants (which may cause air pollution): \_\_\_\_\_

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average \_\_\_\_\_ n/a \_\_\_\_\_ Maximum \_\_\_\_\_ n/a \_\_\_\_\_

G. Indicate liquid or solid wastes generated and method of disposal.

n/a

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: \_\_\_\_\_ \* \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ \* \_\_\_\_\_ ft.  
 Gas Flow Rate: \_\_\_\_\_ \* \_\_\_\_\_ ACFM \_\_\_\_\_ \* \_\_\_\_\_ DSCFM Gas Exit Temperature: \_\_\_\_\_ \* \_\_\_\_\_ °F.  
 Water Vapor Content: \_\_\_\_\_ \* \_\_\_\_\_ % Velocity: \_\_\_\_\_ \* \_\_\_\_\_ FPS

\* Please see Appendix A

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste \_\_\_\_\_

Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_

Approximate Number of Hours of Operation per day \_\_\_\_\_ day/wk \_\_\_\_\_ wks/yr. \_\_\_\_\_

Manufacturer \_\_\_\_\_

Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

	Volume (ft) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ Stack Temp. \_\_\_\_\_

Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM\* Velocity: \_\_\_\_\_ FPS

\*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device:  Cyclone  Wet Scrubber  Afterburner  
 Other (specify) \_\_\_\_\_

Brief description of operating characteristics of control devices: n/a

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

n/a

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

#### SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

**SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY**

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes  No

Contaminant

Rate or Concentration

_____	_____
_____	_____
_____	_____

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes  No

Contaminant

Rate or Concentration

_____	_____
_____	_____
_____	_____

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

_____	_____
_____	_____
_____	_____

D. Describe the existing control and treatment technology (if any).

- |                           |                          |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:*           | 4. Capital Costs:        |

\*Explain method of determining



5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

10. Stack Parameters

- a. Height: ft.      b. Diameter: ft.
- c. Flow Rate: ACFM      d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device:      b. Operating Principles:
- c. Efficiency:<sup>1</sup>      d. Capital Cost:
- e. Useful Life:      f. Operating Cost:
- g. Energy <sup>2</sup>      h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device:      b. Operating Principles:
- c. Efficiency:<sup>1</sup>      d. Capital Cost:
- e. Useful Life:      f. Operating Cost:
- g. Energy:<sup>2</sup>      h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:<sup>1</sup>

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:<sup>2</sup>

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration

(8) Process Rate:<sup>1</sup>

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration

(8) Process Rate:<sup>1</sup>

10. Reason for selection and description of systems:

<sup>1</sup>Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

### SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. \_\_\_\_\_ no. sites \_\_\_\_\_ TSP \_\_\_\_\_ ( ) SO<sub>2</sub>\* \_\_\_\_\_ Wind spd/dir:

Period of Monitoring \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year

Other data recorded \_\_\_\_\_

Attach all data or statistical summaries to this application.

Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent?  Yes  No
- b. Was instrumentation calibrated in accordance with Department procedures?  
 Yes  No  Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. \_\_\_\_\_ Year(s) of data from \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year
- 2. Surface data obtained from (location) \_\_\_\_\_
- 3. Upper air (mixing height) data obtained from (location) \_\_\_\_\_
- 4. Stability wind rose (STAR) data obtained from (location) \_\_\_\_\_

C. Computer Models Used

- 1. \_\_\_\_\_ Modified? If yes, attach description.
- 2. \_\_\_\_\_ Modified? If yes, attach description.
- 3. \_\_\_\_\_ Modified? If yes, attach description.
- 4. \_\_\_\_\_ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO <sub>2</sub>	_____ grams/sec

E. Emission Data Used in Modeling

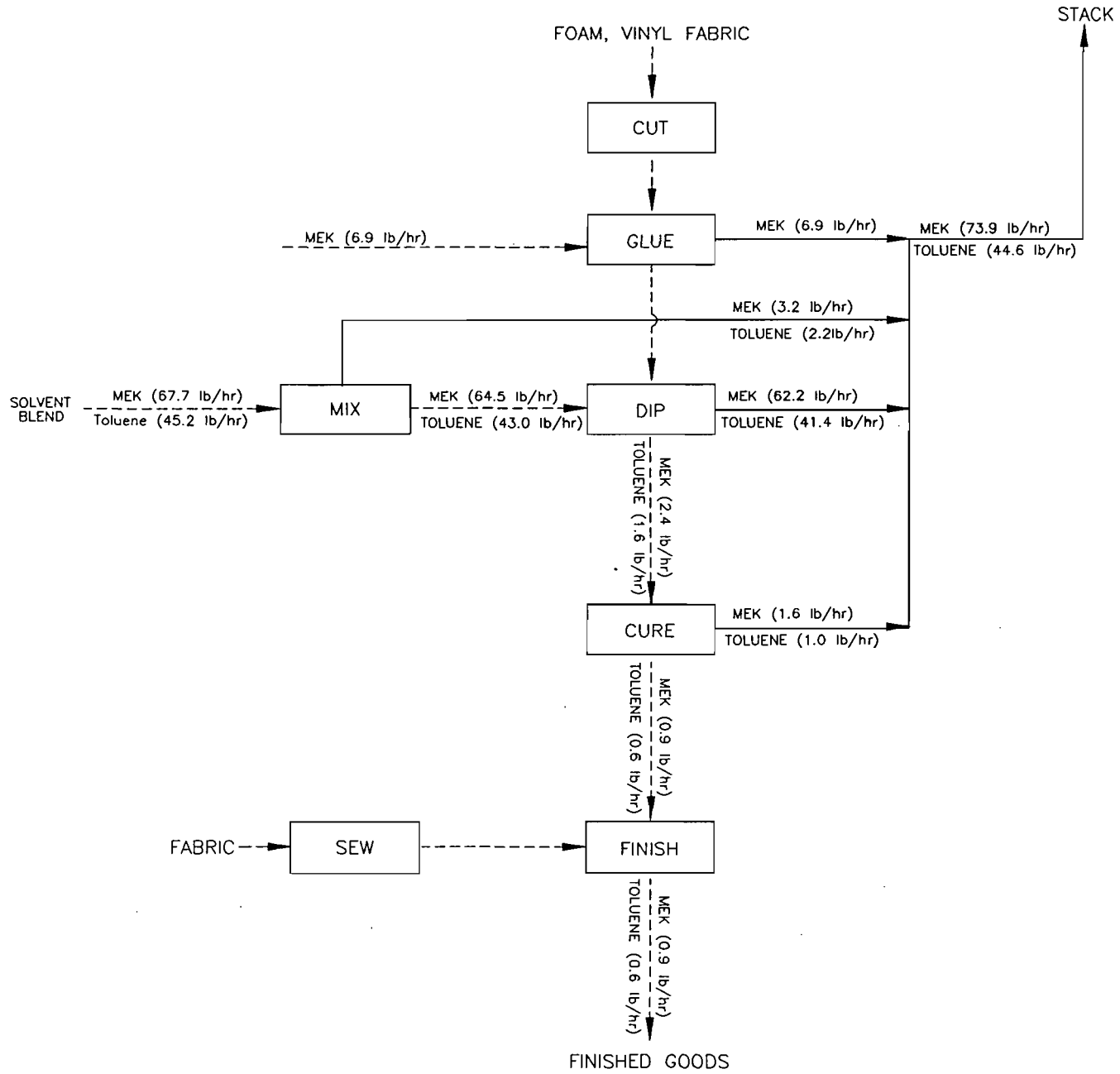
Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

DWG DATE: 26APRIL93 | PRJCT NO.: MF21001 | FILE NO.: F:\MISC | DRAWING: MACHD-93 | CHECKED: D.L. | APPROVED: D.L. | DRAFTER: J.P.



**LEGEND**  
 - - - - -> NON-VOC EMITTING PROCESS  
 ———> VOC EMISSION WITH ER CONTROLS

NOTE: ALL VALUES ARE BASED ON YEARLY AVERAGES.



**PROCESS FLOW DIAGRAM**  
**1993 PROJECTED SOLVENT USAGE AND AIR EMISSIONS**  
 MACHO PRODUCTS

FIGURE  
**1**

**APPENDIX A**



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

**PERMITTEE:**  
Macho Products, Inc.  
2250 Kirby Avenue  
Palm Bay, FL 32905

Permit Number: AC 05-166484  
Expiration Date: May 31, 1993  
County: Brevard  
Latitude/Longitude: 28°02'21"N  
80°35'33"W

Project: Exhaust Duct System for  
Vinyl Coating Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named 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:

For the installation of an exhaust duct system for a vinyl coating facility. This facility is located in Palm Bay, Brevard County, Florida. The UTM coordinates of this site are Zone 17, 539.8 km E and 3,101.4 km N.

The source shall be in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

**Attachment:**

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received on June 19, 1989.
2. DER letter dated July 12, 1989, requesting additional information.
3. Applicant's letter dated July 21, 1989, supplying information requested.

PERMITTEE:  
Macho Products, Inc.

Permit No. AC 05-166484  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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 acknowledgement 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, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, 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.



PERMITTEE:  
Macho Products, Inc.

Permit No. AC 05-166484  
Expiration Date: May 31, 1993

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as 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 the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- 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 notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:  
Macho Products, Inc.

Permit No. AC 05-166484  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance 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 monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.
- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

PERMITTEE:  
Macho Products, Inc.

Permit No. AC 05-166484  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- 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 that 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 submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.

2. The source shall be allowed to operate for up to 2,080 hours per year.

3. Visible emissions from the source shall not be greater than 20% opacity and compliance shall be demonstrated at 90-100% of permitted capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

4. One of the following steps must be carried out before January 1, 1993:

- a. installation of a state-of-the-art pollution control device limiting VOC emissions to 10.0 lbs per hour (based on 95% efficiency); 80 lbs per day (30 day average).
- b. conversion to a water-based or low solvent content coating or other process approved by the Bureau of Air Regulation.

The permittee shall submit a quarterly report to the Bureau of Air Regulation briefly summarizing progress on these steps.

PERMITTEE:  
Macho Products, Inc.

Permit No. AC 05-166484  
Expiration Date: May 31, 1993

SPECIFIC CONDITIONS:

5. No air pollutants shall be discharged which cause or contribute to an objectionable odor.


6. VOC compliance shall be demonstrated using EPA Method 25 or 25A and the results reported to the Department's Central District office before this construction permit expires. The Department shall be notified at least 15 days in advance of the compliance test.

7. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

8. An application for an operation permit must be submitted to the Central District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 14 day  
of November, 1989

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtmann, Secretary

**APPENDIX B**

**1992 SOLVENT USE BY FACTORY DEPARTMENT**  
**MACHO PRODUCTS, INC., PALM BAY, FLORIDA**

Total Solvent Use 1992 202 tons

Solvent Use by Factory Department 1992

**A. Gluing**

Adhesive Use 13.8 tons  
Solvent (MEK) 11.7 tons

Basis: Mass Balance  
(Purchases) - (Inventory Change)

**B. Paint Mixing**

Usage: 2.5 gallons per batch of 130 gallons of paint  
Solvent: 60 percent MEK, 40 percent Toluene  
Basis: Direct Measurement

$$130 \text{ gallons paint} \times 0.8 = 104 \text{ lbs solvent}$$

$$\text{Ratio: } 2.5/104 = 0.024$$

$$(2.5/104) \times (202 - 11.7) = 4.6 \text{ tons}$$

**C. Curing**

Usage:  $x$  grams per set of equipment produced  
Basis: Direct Measurement  
Solvent: 60 percent MEK, 40 percent Toluene

$$x \text{ grams/set} \times Q \text{ sets produced} = 8 \times 10^6 \text{ grams} = 8.7 \text{ tons}$$

NOTE:  $x$  and  $Q$  are company confidential

**D. Normal Migration (left in product)**

- (1) Solvent left in the coating at the time of packaging.
- (2) Not included in emissions reporting

Use:  $y$  grams per set

Solvent: 60 percent MEK, 40 percent Toluene

Basis: Direct Measurement

$$y \text{ grams/set} \times Q \text{ sets produced} = 3.5 \times 10^6 \text{ grams} = 3.9 \text{ tons}$$

NOTE:  $y$  and  $Q$  are company confidential

**E. Paint Dipping**

Basis: Mass Balance

Total Solvent Used - [Gluing + Mixing + Curing + Normal Migration]

$$201.8 - (11.7 + 4.6 + 6.5 + 3.9) = 175.1 \text{ tons}$$

**EXAMPLE CALCULATIONS FOR  
1993 ESTIMATED AIR EMISSIONS**

Example: VOC Emission from Mixing

1992 Estimated Use in Tons = 4.6 tons

1993 Use in Tons =  $4.6 \times 1.23 = 5.6$  tons

Hours of Operation per Year =  $8 \text{ hrs/day} \times 5 \text{ days/wk} \times 52 \text{ wks/yr} = 2080$  hours

1993 Use in lbs/hr =  $5.6 \times 2000/2080 = 5.4$  lbs/hr

Total Solvent Emissions (other than glueing) =  $5.4$  (mix) +  $2.6$  (cure) +  $103.6$  (dip) =  $111.6$  lbs/hr (1993)

$111.6 \times 0.6 = 67.0$  lbs/hr MEK

$111.6 \times 0.4 = 44.6$  lbs/hr Toluene

Total MEK =  $67.0 + 6.9$  (from glue) =  $73.9$  lbs/hr

Toluene =  $44.6$

Total Solvent Emissions =  $118.5$  lbs/hr (1993 estimated usage)



# 1993 PROJECTED SOLVENT USAGE AND AIR EMISSIONS

## MACHO PRODUCTS, INC., PALM BAY, FLORIDA

	Use 1992 Tons	Use 1993 Tons	Hours of Operation Per Year	Use 1993 lbs/hr	Total Emissions lbs/hr
Glue (solvent only)	11.7	14.4	4160	6.9	6.9
Mix	4.6	5.6	2080	5.4	5.4
Cure	6.5	8.0	4160	2.6	2.6
Dip	175.1	215.4	6240	103.6	103.6
Normal Migration	3.9	4.8		1.5	
Total	201.8	248.2		120.0	118.5