

MEMO TO PERMITTING FILE

DATE: March 23, 2011

FROM: Nedin Bahtic, Compliance Inspector

TO: Permitting Section

AIRS ID No: 0830084

Permit No. that requires modification: NEXT PERMIT RENEWAL

List items to be addressed during the next reopening of the permit (revision or renewal) below:

Attached letter from SPX, dated 03/17/11, claims that the new shot blast booth (EU 002) is exempt from permitting in accordance with Rule 62-210.300(3)(b)1., F.A.C. This issue should be addressed at next permit re-opening (probably renewal; current permit 0830084-009-AO expires on 02/08/13).

Referred by: Nedin Bahtic Date: 03/23/11
Addressed by: DANNY STUBAS in Permit No. 12-20-12
Permit Engineer



COPY

Dept. Of Environmental Protection

MAR 21 2011

Southwest District

March 17, 2011

Ms. Pamala Vazquez
Florida Department of Environmental Protection
Southwest District Office
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

Subject: Response to WL 11-0001AS42SWD
SPX Dehydration and Process Filtration
Facility ID. No. 0830084
Marion County

Dear Ms. Vazquez:

This is in response to the above referenced Warning Letter dated February 11, 2011, and issued by the Florida Department of Environmental Protection, regarding the installation by SPX Dehydration and Process Filtration (SPX) of a dust collector for a sandblasting booth without obtaining a construction permit.

SPX asked Pradeep Raval of Koogler and Associates, Inc. to assist in resolving this issue. On February 28, 2011, Mr. Pradeep Raval conducted a compliance test using EPA Method 9 for the visual emissions (VEs) from the new dust collector. The VE test was also observed by Nedin Bahtic of the FDEP SWD office. There were no visible emissions observed during the test (see attached VE sheet). A formal test report was not prepared because, as explained below, it was determined that the unit was exempt from air permitting and air compliance testing requirements.

Additional information gathered during the site visit indicated that the new shot blasting equipment and associated dust collector, which replaced the larger sandblasting unit and its associated dust collector, are exempt from air permitting requirements. The level of particulate matter (PM) emissions expected from this operation is below the generic emissions unit exemption threshold of 5 tons per year, in accordance with Rule 62-210.300(3)(b)1, FAC. Further, the unit is not subject to any other unit-specific requirements, i.e. New Source Performance Standard under 40 CFR 60. As a result, this unit is exempt from air permitting requirements.

A PM emissions analysis is presented below. The new shot blast unit recycles steel shot, and thus results in less air emissions than the typical sand blast units that do not recycle the abrasive. A conservative estimate of potential emissions can be determined using the maximum historical sand usage. Based on available information from 2006 to present, the maximum annual sand use for the two on-site sandblasting operations combined was 25,150 lbs.

Table 4-8 of AP-42, Section 13.2.6 on Abrasive Blasting ("Background Document") lists three different emission factors for abrasive blasting depending on the type of

SPX FLOW TECHNOLOGY
4647 S.W. 40th AVENUE
OCALA, FL 34474
UNITED STATES

TEL | 352 | 237 | 1220
FAX | 352 | 873 | 5195

www.spxft.com



surface blasted: precleaned (EF=0.0099 tons PM₁₀ per ton of sand); painted (EF=0.022 tons PM₁₀ per ton of sand); and oxidized (EF=0.0074 tons PM₁₀ per ton of sand).

Applying the annual maximum of 25,150 lbs, and using the most conservative emission factor, of 0.022 tons PM₁₀ per ton sand, the PM₁₀ emissions can be estimated as follows:

$$\text{PM}_{10} = 25,150 \text{ lbs/yr} \times \text{ton}/2000\text{lbs} \times 0.022 \text{ ton PM}_{10}/\text{ton sand} = 0.28 \text{ tpy}$$

The annual sand usage rate is a good indicator of production levels for this type of source where the size, shape and weight of items being sandblasted can vary significantly.

The above analysis shows that not only the new shot blast unit, but also the two sandblast units identified in the current permit, are exempt from air permitting requirements. The level of PM emissions expected from the sand and shot blasting operations at this site are below the generic emissions unit exemption threshold of 5 tons per year, in accordance with Rule 62-210.300(3)(b)1, FAC.

As a result, the installation of the new shot blasting unit and its associated dust collector did not violate any applicable air permitting requirements.

In order to resolve this issue, we request that FDEP note in its files that the sandblasting and shot blasting operations at this site are exempt from air permitting requirements. We also request that FDEP revise the air operation permit at the time of permit renewal to reflect this exemption.

If you have any questions, please do not hesitate to call Pradeep Raval, of Koogler and Associates, Inc., at (352) 377-5822.

Sincerely,

Keith Douglas
SPX Dehydration and Process Filtration

C: Wendy Simmons, FDEP SWD (via email)
Cindy Zhang-Torres, FDEP SWD (via email)
Nedin Bahtic, FDEP SWD (via email)
Dianne Springler, FDEP DARM (via email)
Pradeep Raval, Koogler and Associates, Inc. (via email)

Dept. Of Environmental Protection

MAR 21 2011

Southwest District

SOURCE NAME SPX Dehydration

ADDRESS 4647 SW 40th Avenue

CITY Ocala **STATE** FL **ZIP** 34474

PHONE **SOURCE ID NUMBER** EU 002

PROCESS EQUIPMENT Shot blaster **OPERATING MODE** Normal

CONTROL EQUIPMENT Dust collector **OPERATING MODE** Normal

DESCRIBE EMISSION POINT
START BH vent **STOP** same

HEIGHT ABOVE GROUND LEVEL
START 20' **STOP** same **HEIGHT RELATIVE TO OBSERVER**
START 20' **STOP** same

DISTANCE FROM OBSERVER
START 20' **STOP** same **DIRECTION FROM OBSERVER**
START 0' **STOP** same

DESCRIBE EMISSIONS
START clear **STOP** same

EMISSION COLOR
START clear **STOP** same **PLUME TYPE:** CONTINUOUS
 FUGITIVE INTERMITTENT

WATER DROPLETS PRESENT: NO YES **IF WATER DROPLET PLUME:**
 ATTACHED DETACHED

POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED
START 6" from vent **STOP** same

DESCRIBE BACKGROUND
START sky **STOP** same

BACKGROUND COLOR
START blue **STOP** same **SKY CONDITIONS**
START PC **STOP** same

WIND SPEED
START 10mph **STOP** same **WIND DIRECTION**
START S **STOP** same

AMBIENT TEMP: **START** 80° **STOP** same **WET BULB TEMP** 70° **RH, percent** 60%

Draw North Arrow

OBSERVATION DATE		START TIME		STOP TIME	COMMENTS
SEC	MIN	0	15	30	
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

COMMENTS

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS
SIGNATURE

TITLE **DATE**

OBSERVER'S NAME (PRINT) PRADEEP RAVAL

OBSERVER'S SIGNATURE *P. Raval* **DATE** 2/25/11

ORGANIZATION KOGLER AND ASSOCIATES, INC.

CERTIFIED BY WHITLOW **DATE** 9/23/10

Dept. Of Environmental Protection

MAR 21 2011

Southwest District





Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 11, 2009

Mr. Kevin Johnson, Vice-President Operations
SPX Dehydration and Process Filtration
4647 S.W. 40th Avenue
Ocala, FL 34474-5722

RE: Permit Nos.: 0830084-008-AC & 0830084-009-AO

Dear Mr. Johnson:

Tuesday, March 10, 2009 I mailed you the above permit. The first page of the permit contained the word "DRAFT" instead of "FINAL".

I have enclosed the correct first page marked "FINAL" for you to use to replace the page marked "DRAFT". The rest of the permit is okay; the pages all show "FINAL".

I am sorry for any inconvenience this has caused you and should you have any questions, please do not hesitate to contact me at (813) 632-7600, Ext 102.

Thank you,

A handwritten signature in cursive script that reads 'Patricia A. Prickett'.

Patricia A. Prickett
Air Program
Senior Clerk

Enclosure



Dept. of Environment
Protection

FEB 23 2009

Southwest District

To whom it may concern:

This is in response to Draft Permit sent to us from Mara Grace Nasca. The permit numbers are referenced below.

0830084-008-AC &

0830084-009-AO

Attached is the proof our add ran in the newspaper as instructed on 2/19/09

If you should have any questions please feel free to call

Robert Hopple

4647 SW 40th Ave.

Ocala FL 34474

352-873-5762 Office

352-875-2211 Cell

SPX DEHYDRATION & FILTRATION
4647 SW 40th AVENUE
OCALA, FLORIDA, 34474
USA

TEL +1 352 237 1220
FAX +1 352 873 5722

www.spxdehydration.com

Dept. of Environmental Protection
AFFIDAVIT OF PUBLICATION

Star-Banner
Published - Daily
Ocala, Marion County, Florida

FEB 23 2009

Southwest District

STATE OF FLORIDA
COUNTY OF MARION

Before the undersigned, a Notary Public of Said County and State, M. DeFazio who on oath says that they are an authorized employee of the Star-Banner, a daily newspaper published at Ocala, in Marion County, Florida; that the attached copy of advertisement, being a notice in the matter of

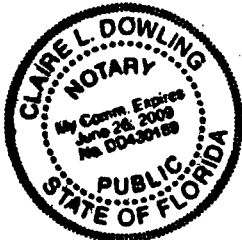
PUBLIC NOTICE OF INTENT TO ISSUE TWO AIR PERMITS STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION DEP File Nos. 0830084-008-AC and 0830084-009-AO SPX Dehydration and Process Filtration Marion County The Department of Environmental Protection Dep

was published in said newspaper in the issues of:

2/19 1x

Affiant further says that the said STAR-BANNER is a daily newspaper published at Ocala, in said Marion County, Florida, and that the said newspaper has heretofore been continuously published in said Marion County, Florida, daily, and has been entered as second class mail matter at the post office in Ocala in said Marion County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the person of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 19th day of February, A.D., 2009



Claire L. Dowling
Notary Public

CLAIRE L. DOWLING
(Print, Type or Stamp Name of Notary Public)

Ad #: A000535138

TWO AIR PERMITS

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File Nos. 0830084-008-AC and 0830084-009-AO
SPX Dehydration and Process Filtration Marion County

The Department of Environmental Protection (Department) gives notice of its intent to issue two air permits to SPX Dehydration and Process Filtration, for the facility located at 4647 S.W. 40th Avenue, Ocala, Marion County. These permits authorize SPX Dehydration and Process Filtration to modify their permitted emission limits as follows: (1) increase the facility-wide VOC emission limit from 37.1 tons per any consecutive 12 month period to 67.0 tons per any consecutive 12 month period; (2) increase the facility-wide total HAP emission limit from 5.0 tons per any consecutive 12 month period to 23.75 tons per any consecutive 12 month period; and (3) add a new facility-wide individual HAP emission limit of 9.5 tons per any consecutive 12-month period. MAILING ADDRESS: SPX Dehydration and Process Filtration, 4647 S.W. 40th Avenue, Ocala, FL 34474-5722 to the attention of Mr. Kevin Johnson, Vice-President Operations.

The Department will issue the final permits with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen days from the date of publication of this Public Notice of Intent to Issue Two Air Permits. Written comments should be provided to the Department of Environmental Protection, 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0928. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permits and require, if applicable, another Public Notice.

The Department will issue the final permits with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S. or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-108.205, F.A.C.

All petitions filed under these rules shall contain:

(c) A statement of when and how the petitioner received notice of the agency action.

number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

a) The name and address of each agency affected and each agency's file or identification number, if known;

(c) A statement of all disputed issues of material fact. If there are none, the petition must so indicate.

(g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action.

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action.

Any person may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, a copy of the draft permits, and all other materials available to the Department that are relevant to the permit decision. Additionally, the Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of "Public Notice of Intent to Issue Two Air Permits." Requests and written comments filed should be provided to the Florida Department of Environmental Protection at 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926, to the attention of Mira Grace Nasca (phone no. 813-632-7600) referencing the DEP file number(s) listed above. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permits and require, if applicable, another Public Notice.

The complete project file includes the application, technical evaluation, draft permits, and the information submitted by the authorized representative, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Mira Grace Nasca, Southwest District Air Program Administrator, at 13051 N. Telecom Parkway, Temple Terrace, Florida or call 813-632-7600, for additional information.

A complete project file 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 Florida Department of Environmental Protection, Southwest District, 13051 N. Telecom Parkway, Temple Terrace, Florida.

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

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.
February 19, 2009
#A000535138

In the Matter of an
Application for Permit by:

Mr. Kevin Johnson, Vice-President Operations
SPX Dehydration and Process Filtration
4647 S.W. 40th Avenue
Ocala, FL 34474-5722

DEP File Nos. 0830084-008-AC &
0830084-009-AO
Marion County

INTENT TO ISSUE TWO AIR PERMITS

The Department of Environmental Protection (Department) gives notice of its intent to issue two air permits in one document (enclosed) for the proposed project, detailed in the application specified above for the reasons stated below.

The applicant, SPX Dehydration and Process Filtration, applied on October 13, 2008, to the Department for a combined air construction permit and air operation permit for its facility located at 4647 S.W. 40th Avenue, Ocala, Marion County. These permits authorize SPX Dehydration and Process Filtration to modify their permitted emission limits as follows: (1) increase the facility-wide VOC emission limit from 37.1 tons per any consecutive 12 month period to 67.0 tons per any consecutive 12 month period; (2) increase the facility-wide total HAP emission limit from 5.0 tons per any consecutive 12 month period to 23.75 tons per any consecutive 12 month period; and (3) add a new facility-wide individual HAP emission limit of 9.5 tons per any consecutive 12 month period. The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that two air permits are required for this project.

The Department intends to issue these two air permits (one document) based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Two Air Permits. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "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. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department of Environmental Protection, 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926, (Telephone: 813-632-7600, Fax: 813-632-7668). **You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C.** No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in Section 50.051, F.S. to the office of the Department issuing the permits. Failure to publish the notice and provide proof of publication may result in the denial of the permits pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permits with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

Stubbs, Danny

08300842008-A2

From: Bob.Hopple@dehydration.spx.com
Sent: Friday, January 30, 2009 9:15 AM
To: Stubbs, Danny
Subject: Teflon msds
Attachments: Emralon 333 MSDS.pdf

Mr Stubbs

Per your request for the Teflon paint we use

Thank You

Robert Hopple

Facilities Manager

SPX Dehydration & Filtration

4647 SW 40th Avenue Ocala Florida 34474

Phone: (352) 873-5782 Fax: (352) 873-5157 Mobile: (352) 875-2211

Email: Bob.Hopple@spx.com Web: <http://www.spxdehydration.com>

Please note:

My Email address has changed to Bob.Hopple@spx.com

The information contained in this electronic mail transmission is intended by SPX Corporation for the use of the named individual or entity to which it is directed and may contain information that is confidential or privileged. If you have received this electronic mail transmission in error, please delete it from your system without copying or forwarding it, and notify the sender of the error by reply email so that the sender's address records can be corrected.

PRODUCT CODE : 5600061

TRADE NAME: EMRALON 333

EFFECTIVE DATE: 11/02/2006

***1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION ***

Manufacturer's Name
ACHESON COLLOIDS COMPANY
1600 Washington Ave.
Port Huron, MI 48060

Emergency Telephone No: CHEMTREC
DOMESTIC: 1-800-424-9300
INTERNATIONAL: 01-703-527-3887
(CALL COLLECT)

Chemical Family
PTFE IN RESIN

***2. COMPOSITION/INFORMATION ON INGREDIENTS ***

---CAS Number---	---Ingredients---	Carcinogenicity			
		%WT/WT	NTP	IARC	OSHA
25067-11-2	Fluorinated Ethylene Propylene	3-7	N	N	N
9002-84-0	Polytetrafluoroethylene	3-7	N	N	N
1333-86-4	Carbon Black	1-5	N	Y	Y
872-50-4	N-Methylpyrrolidone	30-60	N	N	N
108-65-6	Propylene Glycol Methyl Ether Acetate	10-30	N	N	N
ACCESS # 859	Proprietary Non-OSHA Haz./Non-WHMIS Controlled	10-30	N	N	N

----- Occupational Exposure Limits -----

CAS Number	ACGIH TLV	OSHA PEL
25067-11-2	None Estab.	None Estab.
9002-84-0	None Estab.	None Estab.
1333-86-4	3.50mg/m3	3.50mg/m3
872-50-4	100.00 PPM	None Estab.
108-65-6	100.00 PPM	100.00PPM
ACCESS # 859	None Estab.	None Estab.

3. HAZARDS IDENTIFICATION **EMERGENCY OVERVIEW**

Potential Health Effects --

INGESTION :

Harmful if swallowed.

EYE CONTACT :

Causes severe eye irritation.

SKIN CONTACT :

Dryness, itching, cracking, burning, redness, and swelling are conditions associated with excessive skin contact.

OTHER SKIN CONTACT :

May be absorbed through the skin.

INHALATION :

Vapors and mists irritate eyes, nose and throat.
Vapors and mists generated from this product may be harmful if inhaled.

CHRONIC:

This product contains carbon black which is classified by IARC as a 2B Carcinogen, Possibly Carcinogenic to Humans, based on "sufficient evidence in animals" and "inadequate evidence in humans."

This product contains N-methylpyrrolidone(NMP). Animal studies show that exposure to NMP during pregnancy is harmful to the developing fetus, but does not impair fertility. In lifetime feeding and inhalation studies in rats, NMP did not cause cancer. In lifetime feeding and inhalation studies in mice, NMP increased the incidence of liver tumors.

***4. FIRST AID MEASURES ***

Ingestion :

If swallowed, wash out mouth with water provided person is conscious. Call Poison Control for further instructions. DO NOT INDUCE VOMITING.

Skin Contact:

If excessive skin contact with this product occurs, flush immediately with plenty of water, followed by washing with soap and water.

Eye Contact:

If this product is splashed into the eyes, flush eyes immediately with plenty of water for at least 15 minutes.

Inhalation :

If excessive amounts of vapors or mists from this product are inhaled, remove to fresh air. Apply artificial respiration and other supportive measures as required. Consult a poison center, emergency room or lung specialist for additional information and guidance.

***5. FIRE FIGHTING MEASURES ***

Flashpoint and Method : 135 F PENSKY-MARTENS CLOSED CUP

Flammable Limits: 1.5 - 10.0 %

General Hazard :

HIGHLY FLAMMABLE: Will be easily ignited by heat, sparks, or flames. Vapors may form explosive mixtures with air. Vapors may travel to source of ignition and flash back. Most vapors are heavier than air. They will spread along ground and collect in low or confined areas (sewers, basements, tanks). Vapor explosion hazard indoors, outdoors or in sewers. Those substances designated with a "P" may polymerize explosively when heated or involved in a fire. Runoff to sewer may create fire or explosion hazard. Containers may explode when heated. Many liquids are lighter than water. Substance may be transported hot. If molten

aluminum is involved, refer to GUIDE 169.

Fire :

CAUTION: All these products have a very low flash point: Use of water spray when fighting fire may be inefficient.

CAUTION: For mixtures containing a high percentage of an alcohol or polar solvent, alcohol-resistant foam may be more effective.

Small Fire Fighting Instructions :

Dry chemical, CO2, water spray or regular foam.

Large Fire Fighting Instructions :

Water spray, fog or regular foam. Use water spray or fog; do not use straight streams. Move containers from fire area if you can do it without risk.

General Fire Fighting Instructions:

Fight fire from maximum distance or use unmanned hose holders or monitor nozzles. Cool containers with flooding quantities of water until well after fire is out. Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank. ALWAYS stay away from tanks engulfed in fire. For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible, withdraw from area and let fire burn.

Fire Fighting Equipment:

Wear positive pressure self-contained breathing apparatus (SCBA). Structural firefighters' protective clothing will only provide limited protection.

HAZARDOUS COMBUSTION OR DECOMPOSITION PRODUCTS :

Oxides of Carbon

Hydrogen Fluoride

Carbonyl Fluoride

***6. ACCIDENTAL RELEASE MEASURES ***

Spills :

ELIMINATE all ignition sources (no smoking, flares, sparks or flames in immediate area). All equipment used when handling the product must be grounded. Do not touch or walk through spilled material. Stop leak if you can do it without risk. Prevent entry into waterways, sewers, basements or confined areas. A vapor suppressing foam may be used to reduce vapors. Absorb or cover with dry earth, sand or other non-combustible material and transfer to containers. Use clean non-sparking tools to collect absorbed material.

Large Spills :

Dike far ahead of liquid spill for later disposal. Water spray may reduce vapor; but may not prevent ignition in closed spaces.

***7. HANDLING AND STORAGE ***

STORAGE TEMPERATURE: Ambient. Preferred temperature less than 90 degrees F.

Protect material from direct sunlight.

STORAGE PRESSURE: Atmospheric.

Keep container closed. Loosen closure cautiously before opening. Store in a cool well ventilated place away from incompatible materials. (See Stability and Reactivity, Section). Ground and bond containers when transferring material. Empty containers may retain hazardous properties. Follow all MSDS/Label warnings even after container is emptied.

***8. EXPOSURE CONTROLS/PERSONAL PROTECTION ***

ENGINEERING CONTROLS :

Provide sufficient mechanical ventilation to maintain exposure below TLV(s). Overexposures to vapors and mists may be prevented by ensuring ventilation controls, local exhaust and/or fresh air entry. NIOSH/MSHA Schedule TC-23C- air purifying or a Schedule TC-19C- air supplied respirator may also be used to reduce exposures. Read the manufacturer's instructions and literature carefully to determine the type(s) of airborne contaminant(s) against which the respirator is effective and how it is to be properly fitted.

Eye Protection :

Vapor tight chemical-type splash goggles should be worn when the possibility exists for eye contact due to splashing or spraying of liquid or the generation of airborne particles or vapors.

Skin Protection :

Wear protective clothing, including an impermeable apron or disposable suit and gloves. This protective equipment should be constructed of material(s) which are appropriate to prevent contact with the chemicals listed in the ingredient section of the MSDS. Wear chemical-resistant gloves, made of materials such as neoprene or nitrile.

***9. PHYSICAL AND CHEMICAL PROPERTIES ***

Vapor Pressure	: .30mm Hg at 20c	Vapor Density	:>1 (AIR = 1)
Specific Gravity	: 1.12	Evaporation Rate	:< BUAC
Solubility in Water	: Nil	Freezing Point	:Not available
pH	: Not available	Freezable	: No
Boiling Point	: 95 F	VOC	: 808 g/l
Viscosity	: 150-1200	Reduced VOC	:N/A
Appearance	: BLACK		
Product Use			:NOT DETERMINED
Odor			:NOT DETERMINED
Odor Threshold			:NOT DETERMINED
Coefficient of water/oil Distributon			:NOT DETERMINED
Auto-ignition Temperature			:NOT DETERMINED
Explosion Data-Sensitivity to Mechanical Impact			:NOT DETERMINED
Explosion Data-Sensitivity to Static Discharge			:NOT DETERMINED
Physical State			:NOT DETERMINED

***10. STABILITY AND REACTIVITY ***

GENERAL :

This product is stable and hazardous polymerization will not occur.

INCOMPATIBLE MATERIAL AND CONDITIONS TO AVOID :

Strong oxidizers.

***11. TOXICOLOGICAL INFORMATION ***

LD50 IS FOR ORAL RAT	872-50-4	3598.00mg/kg
LD50 IS FOR ORAL RAT	108-65-6	8532.00mg/kg
LC50 SPECIES AND ROUTE		: NOT DETERMINED
REPRODUCTIVE TOXICITY		: NOT DETERMINED
TERATOGENICITY		: NOT DETERMINED
EMBRYOTOXICITY		: NOT DETERMINED
MUTAGENICITY		: NOT DETERMINED
NAME OF SYNERGISTIC PRODUCTS/EFFECTS		: NOT DETERMINED

***12. ECOLOGICAL INFORMATION ***

NOT AVAILABLE

***13. DISPOSAL CONSIDERATIONS ***

Care must be taken to prevent environmental contamination from the use of this material. The user of this material has the responsibility to dispose of unused material, residues and containers in compliance with all relevant local, state and federal laws and regulations regarding treatment, storage and disposal for hazardous and nonhazardous wastes.

***14. TRANSPORT INFORMATION ***

DOT (Dept. of Transportation):

Not Regulated

REMARKS: The above applies only to containers less than 119 gallons (450 liters)

Air Shipment (IATA):

IDENTIFICATION NUMBER: UN1263

PROPER SHIPPING NAME : PAINT

HAZARD CLASS : 3

PG: III

Refer to the Acheson Colloids Emergency Response Information Sheet for more detailed transportation handling information.

Ocean Shipment (IMDG):

IDENTIFICATION NUMBER: UN1263

PROPER SHIPPING NAME : PAINT

HAZARD CLASS : 3

PG: III

MARINE POLLUTANT: NO

***15. REGULATORY INFORMATION ***

SARA TITLE 3: Section 313 Information (40 CFR 372)

This product contains a chemical which is listed in Section 313 at or above DE MINIMIS concentration. The following listed chemicals are present:

CAS NUMBER	DESCRIPTION	%
872-50-4	N-Methylpyrrolidone	43.90

California Proposition 65:

WARNING: This product contains the following chemicals that are known to the State of California to cause cancer, birth defects or other reproductive harm.

COMPONENT DESCRIPTION	CAS NUMBER
Carbon Black	1333-86-4
N-Methylpyrrolidone	872-50-4
4,4'-Methylenedianiline	101-77-9

DSL- All components of this product are listed or are excluded from listing on the Canadian Domestic Substances List (DSL) Inventory.

TSCA- All components of this product are listed or are excluded from listing on the U.S. Toxic Substances Control ACT (TSCA) Chemical Substance Inventory.

***16. OTHER INFORMATION ***

If this material is part of a multiple component system, read the MSDS(s) for the other component(s) before blending as the resulting mixture may have the hazards of all of its parts.

These data are offered in good faith as typical values and not as a product specification. No warranty, either expressed or implied, is hereby made. The recommended industrial hygiene and safe handling procedures are believed to be generally applicable. However, each user should review these recommendations in the specific context of the intended use and determine whether they are appropriate.

Prepared By: Safety, Health and Environmental Dept
PHONE: 1-810-984-5581

For more information on products manufactured at our California site call:
1-909-947-2228



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

October 31, 2008

Mr. Kevin Johnson, Vice-President Operations
Flair Corporation
4647 S.W. 40th Avenue
Ocala, FL 34474-5722

Re: Application dated September 23, 2008
DEP File No. 0830084-008-AC & 0830084-009-AO

Dear Mr. Johnson:

On September 29 2008, the Florida Department of Environmental Protection (Department) received your application for a combined air operation and construction permit. The application is not considered complete. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. Please refer to the section titled "Owner/Authorized Representative" on page 3 of the permit application. Based on the information listed on the "Florida Department of State, Division of Corporations" web site (www.sunbiz.org), you (Kevin Johnson) are not currently listed as an officer of for Flair Corporation. Please either have one of the listed officers submit a letter of authorization for you or have the company information on www.sunbiz.org updated to include you as an officer.
2. Please refer to the section titled "Professional Engineer Certification" on page 3 of the permit application. Based on license search information available on the www.Myflorida.com website, Delta Consultants does not currently have a Certificate of Authorization with the state of Florida. Please resolve this issue and provide the Department with proof that Delta Consultants has obtained their Certificate of Authorization.
3. Please refer to Section III of the Emission Unit Information Section. Please complete the page titled "D. Emissions Units Pollutant Details Information" for each pollutant emitted (i.e. Individual HAPs, Total HAPs and VOCs). Each pollutant should be specified on an individual page. Potential emissions included on this page (Item # 6) should represent the synthetically limited potential. For example, the total HAPs potential was specified in the permit application as 61.82 tons per year. It should be specified at a value less than 25 tons per year because the application indicates HAPs are synthetically limited.

NOTE - Rule 62-4.050, F.A.C. requires applications of this type must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department

Flair Corporation
0830084-008-AC & 0830084-009-AO

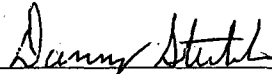
Page 2 of 2

requests for additional information of an engineering nature and therefore, your response to the above requests should be certified by a professional engineer.

Your signature should also be included on the response and it should be submitted to the Department by December 14, 2008. If you have any questions, please call me at 813-632-7600 extension 159.

This staff assessment is preliminary and is designed to assist in the review of the application prior to final agency action. The comments provided herein are not the final position of the department and may be subject to revision pursuant to additional information and further review

Sincerely,



Danny Stubbs
Air Permitting Engineer
Southwest District

cc: Mr. Jyun-Yueh Wu, P.E.
Delta Consultants
8008 Corporate Center Drive, Suite 100
Charlotte, NC 28226

Stubbs, Danny

From: Bahtic, Nedin
Sent: Wednesday, October 22, 2008 1:31 PM
To: Stubbs, Danny
Cc: Henry, Danielle D.; Zhang-Torres
Subject: RE: Flair Corporation 0830084-008-AC and 009-AO

Danny,

I inspected this facility back in November 2006 and found it to be in compliance. According to their AORs, 1.93 tons of HAPs and 3.16 tons of VOC were emitted in 2006, while in 2007 2.57 tons of HAPs and 3.96 tons of VOC were emitted. I have no comments regarding this specific project.

Nedin Bahtic
Environmental Engineer Specialist III
Florida Department of Environmental Protection
Division of Air Resources
13051 North Telecom Parkway
Temple Terrace, FL 33637
phone: 813-632-7600 x126
fax: 813-632-7668

From: Zhang-Torres
Sent: Wednesday, October 15, 2008 9:47 AM
To: Bahtic, Nedin; Noor, Sajeda
Cc: Stubbs, Danny; Henry, Danielle D.
Subject: Flair Corporation 0830084-008-AC and 009-AO

Company Name/Site: Flair Corporation
Project Number: 0830084-008-AC and 009-AO
Receipt Date: 10/13/08
Response Due Date: 10/27/08

Assigned Inspector: Nedin Bahtic

Last Facility Inspection (ARMS): 11/17/06

Permit Engineer: Danny Stubbs

This is a combined construction and operation modification application for an increase in VOC and HAP allowable emissions. Please let the Permit Engineer know by the date above if you have any changes for the permit, items to add to a potential incompleteness letter, or any other concerns you may have with this project OR IF YOU DO NOT HAVE ANY COMMENTS.

Cindy Zhang-Torres, PE III
Air Permitting Supervisor
FDEP
Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: (813)632-7600, ext. 107
Fax: (813)632-7668

Please note: Florida has a broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your email communications and may therefore be subject to public disclosure.

Stubbs, Danny

From: Noor, Sajeda
Sent: Wednesday, October 22, 2008 9:45 AM
To: Stubbs, Danny
Cc: Zhang-Torres; Henry, Danielle D.; Falandysz, Cynthia
Subject: RE: Flair Corporation 0830084-008-AC and 009-AO

Dear Danny,

I have found no enforcement cases within the past five years in the ARMS compliance modules. I have checked in the enforcement activity folder, and currently there are no open cases present from within the past five years. There is no immediate indication of enforcement issues within the facility compliance folder.

If you require any further information, please let me know.

Kind Regards,

Sajeda Noor
Environmental Specialist I
Florida Department of Environmental Protection
Division of Air Resources
18051 North Telecom Parkway
Temple Terrace, FL 33637
Phone: 813.632.7600 X129
Fax: 813.632.7668

Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communication may therefore be subject to public disclosure.

From: Zhang-Torres
Sent: Wednesday, October 15, 2008 9:47 AM
To: Bahtic, Nedin; Noor, Sajeda
Cc: Stubbs, Danny; Henry, Danielle D.
Subject: Flair Corporation 0830084-008-AC and 009-AO

Company Name/Site: Flair Corporation
Project Number: 0830084-008-AC and 009-AO
Receipt Date: 10/13/08
Response Due Date: 10/27/08

Assigned Inspector: Nedin Bahtic

Last Facility Inspection (ARMS): 11/17/06

Permit Engineer: Danny Stubbs

This is a combined construction and operation modification application for an increase in VOC and HAP allowable emissions. Please let the Permit Engineer know by the date above if you have any changes for the permit, items to add to a potential incompleteness letter, or any other concerns you may have with this project OR IF YOU DO NOT HAVE ANY COMMENTS.

Cindy Zhang-Torres, PE III
Air Permitting Supervisor
FDEP
Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: (813)632-7600, ext. 107
Fax: (813)632-7668

Please note: Florida has a broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your email communications and may therefore be subject to public disclosure.

Stubbs, Danny

From: Zhang-Torres
Sent: Wednesday, October 15, 2008 9:47 AM
To: Bahtic, Nedin; Noor, Sajeda
Cc: Stubbs, Danny; Henry, Danielle D.
Subject: Flair Corporation 0830084-008-AC and 009-AO

Company Name/Site: Flair Corporation
Project Number: 0830084-008-AC and 009-AO
Receipt Date: 10/13/08
Response Due Date: 10/27/08

Assigned Inspector: Nedin Bahtic

Last Facility Inspection (ARMS): 11/17/06

Permit Engineer: Danny Stubbs

This is a combined construction and operation modification application for an increase in VOC and HAP allowable emissions. Please let the Permit Engineer know by the date above if you have any changes for the permit, items to add to a potential incompleteness letter, or any other concerns you may have with this project OR IF YOU DO NOT HAVE ANY COMMENTS.

Cindy Zhang-Torres, PE III
Air Permitting Supervisor
FDEP
Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: (813)632-7600, ext. 107
Fax: (813)632-7668

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Jeb Bush
Governor

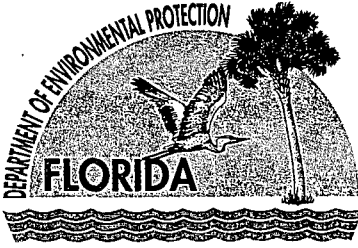
Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Colleen M. Castille
Secretary

"More Protection, Less Process"

Printed on recycled paper.



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Dept. of Environmental Protection

OCT 13 2008

September 30, 2008

SPX DEHYDRATION & PROCESS FILTRATION
4647 S.W. 40TH AVENUE
OCALA FL 34474-5799

Southwest District

Dear Sir/Madam:

Your check number 232051 for \$1,250.00, is being returned for the following reason(s):

***Insufficient Fee. The correct fee is \$2600.00.
The application cannot be reviewed or processed until full payment is received.**

For more program specific information, please contact:

Cindy Zhang-Torres Phone: 813-632-7600 x107
Department of Environmental Protection
Southwest District Office
13051 N Telecom Pkwy
Temple Terrace FL 33637

Sincerely,

Sandra Wilson
Finance and Accounting

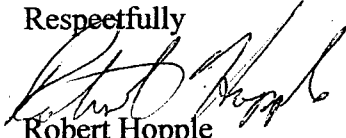
RCT_Ret_R/ 9272

Enclosure(s)

Dear Ms Wilson,

Attached is the check for \$2600.00 as requested, please proceed with the request for the air permit

Respectfully



Robert Hopple
SPX Dehydration and Process Filtration
Facility manager
352-873-5762

Dept. of Environmental
Protection

OCT 13 2008

Southwest District

September 9, 2008

Dept. of Environmental
Protection

Nancy E. Knight
Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

SEP 29 2008

Southwest District

Subject: **Air Permit Modification Application**
SPX Dehydration and Process Filtration
Permit No. 0830084-007-AF

Dear Ms. Knight:

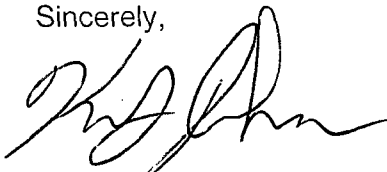
Enclosed are two copies of an air permit modification application for the Flair Corporation (SPX Dehydration and Process Filtration, a subsidiary of SPX Corporation) (SPX), located at 4647 S.W. 40th Avenue in Ocala, Marion County, Florida. This application is being submitted to request revised emission limits for Volatile Organic Chemicals (VOC) and Hazardous Air Pollutant (HAP) emissions, and to add an exempt source to the current air operation permit. An application fee in the amount of \$1,250.00 is also enclosed.

Based on updated vendor information, future actual total HAP emissions may exceed the permitted emission limits of the Surface Coating Operation (EU001). Currently, emissions are limited to 37.1 tons VOC per year and <5.0 tons HAPs. SPX is requesting to revise the permit emissions limits to <67 tons VOC per year and <10 tons per year (tpy) for any single HAP or >25 tpy for total HAPs.

The facility is also installing a Koike Aronson Supergraph, Model #SGIV plasma torch burn table with a Scandmist MA 400D oil mist separator. The Scandmist unit will be equipped with a 1 foot diameter, 40-foot high exhaust stack that passes through the roof. The Scandmist unit is necessary to reduce employee industrial hygiene exposures to plasma fumes from metal cutting. The installation of the Scandmist unit is not required for the control of pollutant emissions to the atmosphere. Uncontrolled PM emissions from plasma torch cutting is estimated to be <5.0 tpy; therefore, SPX requests the source be added to the air permit as an exempt source.

Please contact our technical point of contact, Bob Hopple at (352) 873-5762 or Tony Rossano of Delta Consultants at (704) 543-3907 if you have any questions.

Sincerely,



Kevin Johnson
Vice-President Operations
SPX Dehydration and Process Filtration