



Aquatic Supplies of America

Dept. of Environmental  
Protection

March 5, 2007

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Florida Dept. of Environmental Protection  
Southwest District  
13051 N. Telecom Parkway  
Temple Terrace, FL 33637-0926  
Attn; Cindy Zhang-Torres, P.E.

Southwest District

Re: Applicable Requirements  
A.S.A. Manufacturing, Inc.  
Facility ID No.: 0830104

Dear Ms. Zhang-Torres,

In anticipation of our upcoming inclusion in the revised 40 CFR Part 63, Subpart WWWW, National Emissions Standards For Hazardous Air Pollutants: Reinforced Plastics Composite Production, these guidelines were used in filling out our application and designing our record keeping program. We were compliant as of the required date of April 21, 2006 (63.5800 and 63.5840 Table 2).

To follow are specific rule citations of these applicable regulations for our facility to be installed or changed in our current Title V Permit.

63.5797

The organic HAP content of our materials are provided by the manufacturer. MSDS sheets were provided in attachment "C" our application. The upper limit range on these materials is used.

63.5810

Monthly emissions tracking reports use the "Emission Factor Equations" listed in *Table 1 to Subpart WWWW of Part 63* to calculate emissions for our Open Molding Operations.

In addition to our material usage, reports are maintained for Styrene, VOC's, and HAP's. These equations are shown in attachment #2 of Permit.

63.5840

Compliance is demonstrated by using an organic HAP emissions limit. In addition to monthly Styrene, VOC and HAP emissions, our monthly reports also track for the previous consecutive twelve months.

Example; A.S.A. Manufacturing has an emissions limitation for HAP's of 35.8 tons per consecutive 12-month period. The running total at the end of January 2007 was 6.32 tons.

63.5910

"Statement of Compliance" reports are submitted each July and January for the previous six months.

Our current Title V permit states this report is required only annually, this needs to be updated. We have been sending these in both July and January because of this NESHAP rule.

63.5920

Paper copies of all applicable records are maintained and available for inspection in the office at A.S.A. Manufacturing for five years.

Please contact us if there is any other information you need to update our permit.

Sincerely,



Julie Zurich  
General Manager