



Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Mr. Todd DuPlessis
President, A.S.A. MFG, Inc.
14879 SW 111th Street
Dunnellon, FL 34432-4734

Re: Title V Air Operation Permit Renewal
DRAFT/PROPOSED Permit Project No.: 0830104-007-AV

Dear Mr. DuPlessis:

One copy of the DRAFT/PROPOSED Permit for the renewal of a Title V Air Operation Permit for the facility located at 14879 SW 111th Street, in Dunnellon, Marion County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" are also included.

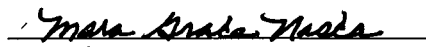
An electronic version of the DRAFT/PROPOSED Permit will be posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

<http://www.dep.state.fl.us/air/emission/apds/default.asp>

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Mara Grace Nasca, at the above letterhead address. If you have any other questions, please contact Danny Stubbs, at 813/632-7600 extension 159.

Sincerely,


Mara Grace Nasca
District Air Program Administrator
Southwest District

MGN/ds/pp

Enclosures

In the Matter of an
Application for Permit Renewal by:

A.S.A. MFG, Inc.
14879 SW 111th Street
Dunnellon, FL 34432-4734

DRAFT/PROPOSED Permit Project No.: 0830104-007-AV
Marion County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL

The Florida Department of Environmental Protection Southwest District (permitting authority) gives notice of its intent to issue a Title V Air Operation Permit Renewal (copy of DRAFT/PROPOSED Permit attached) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, A.S.A. MFG, Inc., applied on December 16, 2009, to the permitting authority for a Title V Air Operation Permit Renewal for their fiberglass products manufacturing facility located at 14879 SW 111th Street, Dunnellon, Marion County.

The permitting authority 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 62-213. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V Air Operation Permit Renewal is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V Air Operation Permit Renewal based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. 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 permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Florida Department of Environmental Protection Southwest District, 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926 (Telephone: 813/632-7600, Fax: 813/632-7668), within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

EPA has agreed to treat the DRAFT Title V Permit as a PROPOSED Title V Permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The FINAL Title V Air Operation Permit will be issued after the conclusion of the 45-day EPA review

period so long as no adverse comments are received that results in a different decision or significant change of terms or conditions.

The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address:

<http://www.epa.gov/region4/air/permits/Florida.htm>

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT/PROPOSED Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, FL 32399-3000 (Telephone 850/488-9730, Fax: 850/487-4928). 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 permitting authority 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 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

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

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

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

Mediation will not be available in this proceeding.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Title V permit. Any petition shall be based only on objections to the Title V permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any Title V permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

Executed in Hillsborough County, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Mara Grace Nasca
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE INITIAL TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT/PROPOSED Permit package) and all copies were sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 02-26-2010 to the person(s) listed:

Mr. Todd DuPlessis, A.S.A. MFG, Inc. (todd@asamfg.com)

Mr. William F. Karl, Environmental Consulting & Technology, Inc. (wkarl@ectinc.com)

Clerk Stamp

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


(Clerk)

02-26-2010
(Date)

In addition, copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL (including the DRAFT/PROPOSED Permit package) were posted electronically as noted to the person(s) listed:

Ms. Barbara Friday (*posted electronically on DEP Darm_Common drive by permit engineer and email notification sent to Barbara Friday, BAR [barbara.friday@dep.state.fl.us] for posting with Region 4, U.S. EPA*)

Stubbs, Danny

From: Friday, Barbara
Sent: Friday, February 26, 2010 10:35 AM
To: Ana Oquendo; Kathleen Forney; Walker, Elizabeth (AIR)
Cc: Stubbs, Danny; James_Capp@dnr.state.ga.us
Subject: New Posting #0830104

There is a new posting on Florida's website.

0830104007AV
A.S.A. MFG, INC.

Draft/Proposed Permit Renewal

Please see Florida's Air Permit Documents Search <<http://www.dep.state.fl.us/air/emission/apds/default.asp>> to retrieve permitting documents for this project."

Pursuant to Rule 62-213.450, Florida Administrative Code, the Florida Department of Environmental Protection may also provide affected states with notice of the Title V permitting action in this communication."

If you have any questions, feel free to contact me.

Thanks,

Barbara

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL

Florida Department of Environmental Protection
Southwest District

DRAFT/PROPOSED Permit Project No.: 0830104-007-AV
Marion County

The Florida Department of Environmental Protection Southwest District (permitting authority) gives notice of its intent to issue a Title V Air Operation Permit Renewal to A.S.A. MFG, Inc. for their fiberglass products manufacturing facility located at 14879 SW 111th Street, Dunnellon, Marion County. The applicant's name and address are: A.S.A. MFG, Inc.; Mr. Todd DuPlessis, 14879 SW 111th Street, Dunnellon, FL 34432.

EPA has agreed to treat the DRAFT Title V Permit as a PROPOSED Title V Permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The FINAL Title V Air Operation Permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that results in a different decision or significant change of terms or conditions.

The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address:

<http://www.epa.gov/region4/air/permits/Florida.htm>

The Permitting Authority will accept written comments concerning the DRAFT/PROPOSED Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked and all facsimile comments must be received by the close of business (5:00 pm), on or before the end of this 30-day period, by the Permitting Authority at 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926 or facsimile 813/632-7668. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (<http://faw.dos.state.fl.us/>) and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT/PROPOSED Permit, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (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 of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730, Fax: 850/487-4938). 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 the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority 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 applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address and telephone number of the petitioner; 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 petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so state;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

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

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

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Title V permit. Any petition shall be based only on objections to the Title V permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any Title V permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

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:

Permitting Authority:

Florida Department of Environmental Protection Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813/632-7600
Fax: 813/632-7668

The complete project file includes the DRAFT/PROPOSED Permit, the application for renewal, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Mara Grace Nasca, or the project engineer, Danny Stubbs, at the above address, or call 813/632-7600, extension 159, for additional information.

A.S.A. MFG, Inc.
Facility ID No.: 0830104
Marion County

Title V Air Operation Permit Renewal

DRAFT/PROPOSED Permit Project No.: 0830104-007-AV

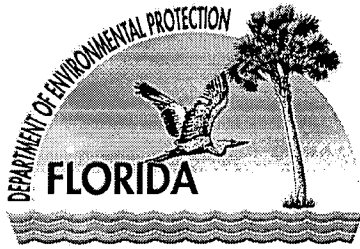
Permitting & Authority:
Florida Department of Environmental Protection
Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813/632-7600
Fax: 813/632-7668

Title V Air Operation Permit Renewal

DRAFT/PROPOSED Permit No.: 0830104-007-AV

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Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Permittee:
A.S.A. MFG, Inc.
14879 SW 111th Street
Dunnellon, Florida 34432

DRAFT/PROPOSED Permit No.: 0830104-007-AV
Facility ID No.: 0830104
SIC No(s): 30,3089
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit. This existing facility is located at 14879 SW 111th Street, Dunnellon, Marion County; UTM Coordinates: Zone 17, 366.9 km East and 3215.7 km North; and, Latitude: 29°03'44" North and Longitude: 82°21' 59" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

- APPENDIX I-1, List of Insignificant Emissions Units and/or Activities
- APPENDIX TV-6, TITLE V CONDITIONS (version dated 06/23/06 with AOR and Renewal updates 11/10/2008)
- ATTACHMENT 1, 40 CFR PART 63, SUBPART WWWW
- ATTACHMENT 2, Unified Emission Factors for Open Molding of Composites (version dated July 23, 2001)

Effective Date: [ARMS Day 55]
Renewal Application Due Date: [Month day, year]
Expiration Date: [Month day, year]

DRAFT/PROPOSED

Mara Grace Nasca
District Air Program Administrator
Southwest District

MGN/ds/pp

Section I. Facility Information.

Subsection A. Facility Description.

The facility is a fiberglass products manufacturing facility that produces fiberglass drains/sumps for swimming pools, fiberglass wall panels for water parks, and other miscellaneous fiberglass products. The facility is classified as a Title V facility and is subject to the requirements of 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Renewal application received December 16, 2009, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	Fiberglass Products Manufacturing

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History

Statement of Basis.

These documents are on file with the permitting authority:

Initial Title V Air Operation Permit issued July 31, 2005

Title V Air Operation Permit Administrative Correction issued September 30, 2005

Title V Air Operation Permit Revision issued August 18, 2007

Application for a Title V Air Operation Permit Renewal received December 16, 2009

Section II. Facility-wide Conditions.**The following conditions apply facility-wide:**

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.
 2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. Objectionable Odor is defined as, "Any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance."
[Rules 62-296.320(2) and 62-210.200(181), F.A.C.; construction permit 0830104-003-AC]
 3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
 4. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 10162
Fairfax, VA 22038
Telephone: 703/227-7650
 - and,
 - b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
- [40 CFR 68]
5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The permittee shall comply with the following:

- A. Resin/gel coating activities shall be conducted inside the manufactured/shop building, with the exception of manual touch-up activities.
- B. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of solvent materials.
- C. All solvent from solvent washings (equipment clean-up) shall be directed into containers that prevent evaporation in the atmosphere.
- D. All materials containing VOC/OS's shall be stored in closed containers and/or in small automatic closing safety cans.
- E. The two axial flow exhaust fans in the three sided booth shall have no device that restricts the exhaust exiting the stacks, i.e., rain cap.
- F. The wall mounted exhaust fans located on both ends of the manufactured/shop building shall have no device that restricts the exhaust exiting the stack, i.e., rain cap.
- G. An exhaust fan shall be operating during any time materials containing VOCs and/or Styrene is being used in the section (area of the building) being exhausted by that fan. The fan shall remain operating for at least 1 hour after usage of such material(s).
- H. All exhaust fan intakes shall not be obstructed, except for fiber filters that are used.
- I. Tightly cover or close all VOC containers when they are not in use.
- J. Prevent excessive air turbulence across exposed VOC/OS.
- K. Immediately confine and clean up VOC/OS spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit 0830104-003-AC]

7. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-6, TITLE V CONDITIONS):

- A. Application of water to paved and unpaved areas accommodating vehicular traffic, as necessary.
- B. Daily remove particulate matter from buildings or work areas. The collected particulate shall be transferred to a trash bin in a manner so that it will not become airborne.
- C. Enclosure or covering of activities or equipment where necessary.
- D. Filters shall be used on all the three sided booth exhaust fans that vent air to the atmosphere. The filters shall be changed (replaced) as necessary to ensure proper ventilation.

- E. Unconfined particulate emissions from trimming and other similar activities such as: cutting, shaping, and sanding operations performed by hand tools and tabletop equipment shall be controlled by normal "good housekeeping" procedures.

[Rule 62-296.320(4)(c)2., F.A.C.; Construction Permit 0830104-003-AC]

8. As an indicator that the precautions to control unconfined particulate emission are adequate, visible emissions from each building, shed, and at the property line should not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but may be a violation of the precautions stated above and serve as justification to the Department to require additional controls or work practices.

[Rule 62-4.070(3), F.A.C.; Construction Permit 0830104-003-AC]

9. Special Compliance Tests. - When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

[Rule 62-297.310(7)(b), F.A.C.]

10. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

11. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Notes: This condition implements the requirements of Rules 62-213.440(3)(a)2. and 3., F.A.C. (see Condition No. 51 of Appendix TV-6, Title V Conditions). See additional semiannual monitoring report requirement in 40 CFR 63, Subpart WWW §63.5910}}

12. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Southwest District office.

Department of Environmental Protection
Air Compliance Section
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813/632-7600
Fax: 813/362-7668

[Rule 62-4.070(3), F.A.C.]

13. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

14. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

[Rule 62-213.420(4), F.A.C.]

NOTES TO PERMITTEE:

- Annual Operating Report - see Appendix TV-6, item 24(3)
- Permit Renewal - see Appendix TV-6, item 5

Section III. Emissions Unit(s) and Conditions.**Subsection [A]. This section addresses the following emissions unit(s).**

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	Fiberglass Products Manufacturing

Fiberglass drains/sumps are manufactured in a three-sided booth which is located within the manufacturing building. Molds are prepared using wax-like paste as a releasing agent. Gel coat and resin are applied to the molds using hand layout as well as chop gun (spray) application. Acetone is used for chop gun flushing and cleaning of tools. A.S.A. MFG, Inc. uses a non-atomized chop gun for reduced emissions. These materials are applied within the booth and emissions are exhausted by means of two axial flow exhaust fans, which discharge horizontally from the manufacturing building through gravity louvers. The booth is equipped with a Pre-Baffle System designed to reduce particulate matter emissions. The drains/sumps are then transferred to a covered area outside the manufacturing building where trimming and grinding of parts is performed using hand held electric tools. Touch-up of the gel coat using a small brush is also performed.

Fiberglass wall panels are manufactured on vacuum tables which are located in the open shop area of the manufacturing building. One coat of vinyl ester resin and three coats of general purpose resin are applied by hand, (i.e., rollers or brush). A small amount of styrene is also applied by hand for cleaning and softening of the wall panels. All emissions are fugitive emissions and exhaust the building through two roll-up doors on either end of the building. There are two exhaust fans located directly over each roll-up door, two roof mounted exhaust fans and roof vents located along the peak of the roof. The wall panels are transferred to an outside covered area where cutting, drilling and polishing is performed using hand held electric tools.

{Permitting Notes: This emission unit is regulated under: 40 CFR 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Compliance Assurance Monitoring (CAM) is not applicable for this emission unit, since there is no control device.}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rule 62-210.200(PTE), F.A.C.; Construction Permit 0830104-003-AC]

A.2. Operation Limitations. The permittee shall comply with the following:

- A. The two axial flow exhaust fans in the three sided booth shall have no device that restricts the exhaust exiting the stacks, i.e., rain cap.
- B. The wall mounted exhaust fans located on both ends of the manufactured/shop building shall have no device that restricts the exhaust exiting the stack, i.e., rain cap.
- C. All exhaust fan intakes shall not be obstructed, except for fiber filters that are used.

[Rule 62-296.320(1), F.A.C.; Construction Permit 0830104-003-AC]

A.3. Process Changes. The permittee shall report any proposed process changes, including, but not limited to, (a) any proposed significant change of VOC/OS species, or (b) any proposed increase in the production rate, to the Air Programs of the Southwest District Office of the Department for proper processing. Any physical change in, change in the method of operation of, or addition to a stationary source or facility, which increases the actual emissions of any air pollutant may be considered a "Modification".

[Rule 62-210.300, F.A.C.; Construction Permit 0830104-003-AC]

Emission Limitations and Standards

A.3. Permitted Capacity. In lieu of establishing this emission unit's potential to emit by limiting material usage, throughput, or production, emissions shall not exceed the following:

- A. 34.1 tons per any consecutive 12-month period of any individual hazardous air pollutant (HAP)
- B. 35.8 tons per any consecutive 12-month period of total hazardous air pollutants (HAPs)
- C. 48.7 tons per any consecutive 12-month period of total volatile organic compounds (VOCs), which includes styrene

[Rules 62-4.050, 62-296.320(1), and 62-210.200(PTE), F.A.C.; Construction Permit 0830104-003-AC]

Excess Emissions

A.4. Excess Emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NESHAPS provision.}

[Rule 62-210.700(4), F.A.C.]

Recordkeeping and Reporting Requirements

A.5. In order to document compliance with Condition Nos. 7.D., 24 in Appendix TV-6, and A.3, the permittee shall keep monthly logs (electronic logs are allowed) for the facility. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. Once implemented, the chosen option shall not change without prior written approval of the Department. Implementation of the monthly logs (recordkeeping system) shall begin upon startup of the facility. Note, if any month results in total HAPs, and/or total VOCs and or Styrene emissions being within 10% of its associated allowable emission limit for the prior consecutive 12-month period, the monthly log required below shall be then kept daily. The daily logs shall include a cumulative total to demonstrate compliance with the emission limitations. At a minimum, the logs shall contain the following:

- A. For Specific Condition No. 7.D., a log documenting the date each fan's filter was changed. In addition to the date, be sure each fan's log includes the facility name, signature of the person changing the filter, Facility ID No. (0830104) and Emission Unit ID (001).

The following are requirements per Specific Condition Nos. 24 in Appendix TV-6 and A.3:

- B. Each log shall include the Facility Name, Facility ID No. (0830104), Emission Unit ID (001) and description.
- C. Month, Year and method used for records.
- D. Identify and quantify each resin, coating, solvent, chemical, etc. used at the facility that contains Styrene and/or VOC emissions, per application method. Usage of materials may be based upon an inventory at the beginning of the month, receipt of material during the month and inventory of the materials at the end of the month, provided that the materials are not used in multiple application methods with different emission factors.
- E. Show the appropriate emission factor(s) along with the application method(s) used to determine Styrene and/or VOC emissions.
- F. The tons of each individual HAP emissions for the month.
- G. The tons of total HAP emissions for the month.
- H. The tons of VOC (including Styrene) emissions for the month.
- I. The tons of each individual HAP emissions for the most recent consecutive 12-month period.
- J. The tons of total HAP emissions for the most recent consecutive 12-month period.
- K. The tons of VOC (including Styrene) emissions for the most recent consecutive 12-month period.
- L. Styrene and Methyl Methacrylate (MMA) emissions shall be determined by using the emission factors in the attached Unified Emission Factor for Open Molding of Composites (UEF) Table. The current calculation shall use the formula:

$$\text{Emissions}_{\text{styrene}} \text{ tons} = ((\chi \text{ tons of resin or gel coat}) \times (\text{EF} * \text{lb/ton})) / 2000 \text{ lbs/ton}$$

*EF = the appropriate emission factor from Unified Emission Factors for Open Molding of Composites, UEF Table (See Attachment 2).

- M. Documentation of the HAP and VOC other than styrene and MMA used shall be determined by a mass balance method, or appropriate emission factors.
1. Each log shall have the appropriate footnotes listing emission factors used in calculation.
 2. Each log, where applicable, shall have attached the documentation for all chemicals removed from the facility if the permittee seeks emission credits for the wastes.
 3. The emission factors used to calculate HAP and VOC emissions for the logs shall be updated upon receiving more accurate emission data, such as updates to 40 CFR 63, Subpart WWWW, AP-42, UEF Table, or other references or methods approved by the Department.

Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). Supporting documentation such as Styrene/HAP/VOC content, Styrene/HAP/VOC emission factors used, MSDS sheets, purchase orders, "As Supplied" data sheets, etc. shall be kept for each chemical and associated products, which includes sufficient information to determine emissions. The monthly logs shall be completed within 30 days after the end of each month. Daily logs (if required) shall be completed within 3 business days.

[Rule 62-4.070(3), F.A.C.; Construction Permit 0830104-003-AC]

A.5. Record Retention. All recordkeeping information, supporting documentation, monitoring data, and all compliance test information required by this permit shall be maintained on site for a minimum of the most recent five (5) year period and shall be made available to the Florida Department of Environmental Protection (the Department) upon request. [Rule 62-4.070(3),F.A.C.]

MACT - 40 CFR 63, Subparts A and WWWW, Requirements

A.6. This emission unit shall comply with the applicable provisions* of 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants (NESHAP): Reinforced Plastic Composites Production, as adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C. These provisions are shown in their entirety in ATTACHMENT 1, which is a part of this permit.

ATTACHMENT 1 includes the applicable provisions of 40 CFR 63, Subpart A – General Provisions. ATTACHMENT 1 also includes the revisions made to 40 CFR 63, Subpart WWWW in the August 25, 2005 Federal Register and the revisions made to 40 CFR 63, Subparts A and WWWW in the April 20, 2006 Federal Register. Note, there is currently no centrifugal casting, continuous lamination/continuous casting, polymer casting, closed-molding, SMC Manufacturing, BMC Manufacturing/mixing, filament winding, or pultrusion operations performed at this facility. If at a future date, the permittee decides to add any of these operations, or use an add-on control device, the permittee may be required to obtain a construction permit and/or Title V permit revision.

- * The following applicability references are partially based upon a letter dated March 5, 2007, from the A.S.A. MFG., Inc., General Manager, Ms. Julie Zunich. Therefore, any change in operations may change the applicable provisions.

40 CFR 63 Subpart WWWW Applicable Provision References

(Entire section applies unless otherwise noted with specific applicable subsection references)

What This Subpart Covers

§63.5780 What is the purpose of this subpart?

§63.5785 Am I subject to this

§63.5790 What parts of my plant does this subpart cover?

§63.5795 How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?

Calculating Organic HAP Emissions Factors for Open Molding and Centrifugal Casting

§63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart and how are they used in this subpart?

§63.5797 How do I determine the organic HAP content of my resins and gel coats?

§63.5798 What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?

§63.5799 How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?
§63.5799(b) and (c)

Compliance Dates and Standards

§63.5800 When do I have to comply with this subpart?

§63.5805 What standards must I meet to comply with this subpart?
§63.5805(b) and (g)

Options for Meeting Standards

§63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

General Compliance Requirements

§63.5835 What are my general requirements for complying with this subpart?
§63.5835(a) and (c)

Testing and Initial Compliance Requirements

§63.5840 By what date must I conduct a performance test or other initial compliance demonstration?

§63.5860 How do I demonstrate initial compliance with the standards?
§63.5860(a)

Emissions Factor, Percent Reduction, and Capture Efficiency Calculation Procedures for Continuous Lamination/Casting Operations
(all sections not applicable)

Continuous Compliance Requirements

- §63.5895 How do I monitor and collect data to demonstrate continuous compliance?
§63.5895(c)
- §63.5900 How do I demonstrate continuous compliance with the standards?
§63.5900(a)(2) through (4)
§63.5900(b)
§63.5900(c) (*as it relates to malfunctions*)

Notifications, Reports, and Records

- §63.5905 What notifications must I submit and when?
§63.5910 What reports must I submit and when?
§63.5910(a) through (c)(5)
§63.5910(d)
§63.5910(f) through (i)
- §63.5915 What records must I keep?
§63.5915(a), (c), and (d)
- §63.5920 In what form and how long must I keep my records?

Other Requirements and Information

- §63.5925 What parts of the General Provisions apply to me?
§63.5930 Who implements and enforces this subpart?
§63.5935 What definitions apply to this subpart?

Tables to Subpart WWWW of Part 63

- Table 1 to Subpart WWWW of Part 63** - Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams
- Table 2 to Subpart WWWW of Part 63** - Compliance Dates for New and Existing Reinforced Plastic Composites Facilities
- Table 3 to Subpart WWWW of Part 63** - Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources That Emit Less Than 100 TPY of HAP
- Table 4 to Subpart WWWW of Part 63** - Work Practice Standards
- Table 7 to Subpart WWWW of Part 63** - Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type
- Table 8 to Subpart WWWW of Part 63** - Initial Compliance With Organic HAP Emissions Limits
- Table 9 to Subpart WWWW of Part 63** - Initial Compliance With Work Practice Standards.
- Table 13 to Subpart WWWW of Part 63** - Applicability and Timing of Notifications
- Table 14 to Subpart WWWW of Part 63** - Requirements for Reports
- Table 15 to Subpart WWWW of Part 63** - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63

[Rules 62-204.800(11) and 62-213.400, F.A.C.; 40 CFR 63, Subpart WWWW (40 CFR 63.5780-63.5935)]

Appendix I-1: List of Insignificant Emissions Units and/or Activities.

A.S.A. MFG, Inc.

DRAFT/PROPOSED Permit No.: 0830104-007-AV

Facility ID No.: 0830104

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Manually operated equipment used for trimming, grinding, cutting, drilling and polishing operations
2. Woodworking shop for constructing pallets for shipping purposes
3. Propane-fueled forklift operations

Unified Emission Factors for Open Molding of Composites

July 23, 2001

Emission Rate in Pounds of Styrene Emitted per Ton of Resin or Gelcoat Processed

Styrene content in resin/gelcoat, % ⁽¹⁾	<33 ⁽²⁾	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	>50 ⁽²⁾
Manual	0.126 x %styrene x 2000	83	89	94	100	106	112	117	123	129	134	140	146	152	157	163	169	174	180	((0.286 x %styrene) - 0.0529) x 2000
Manual w/ Vapor Suppressed Resin VSR ⁽³⁾	Manual emission factor [listed above] x (1 - (0.50 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Atomized	0.169 x %styrene x 2000	111	126	140	154	168	183	197	211	225	240	254	268	283	297	311	325	340	354	((0.714 x %styrene) - 0.18) x 2000
Mechanical Atomized with VSR ⁽³⁾	Mechanical Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Atomized Controlled Spray ⁽⁴⁾	0.130 x %styrene x 2000	86	97	108	119	130	141	152	163	174	185	196	207	218	229	240	251	262	273	0.77 x ((0.714 x %styrene) - 0.18) x 2000
Mechanical Controlled Spray with VSR	Mechanical Atomized Controlled Spray emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Mechanical Non-Atomized	0.107 x %styrene x 2000	71	74	77	80	83	86	89	93	96	99	102	105	108	111	115	118	121	124	((0.157 x %styrene) - 0.0165) x 2000
Mechanical Non-Atomized with VSR ⁽³⁾	Mechanical Non-Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
Filament application	0.184 x %styrene x 2000	122	127	133	138	144	149	155	160	166	171	177	182	188	193	199	204	210	215	((0.2746 x %styrene) - 0.0298) x 2000
Filament application with VSR ⁽³⁾	0.120 x %styrene x 2000	79	83	86	90	93	97	100	104	108	111	115	118	122	125	129	133	136	140	0.65 x ((0.2746 x %styrene) - 0.0298) x 2000
Gelcoat Application	0.445 x %styrene x 2000	294	315	336	356	377	398	418	439	460	481	501	522	543	564	584	605	626	646	((1.03646 x %styrene) - 0.195) x 2000
Gelcoat Controlled Spray Application ⁽⁴⁾	0.325 x %styrene x 2000	215	230	245	260	275	290	305	321	336	351	366	381	396	411	427	442	457	472	0.73 x ((1.03646 x %styrene) - 0.195) x 2000
Gelcoat Non-Atomized Application ⁽⁶⁾	SEE Note 9 below	196	205	214	223	232	241	250	259	268	278	287	296	305	314	323	332	341	350	((0.4506 x %styrene) - 0.0505) x 2000
Covered-Cure after Roll-Out	Non-VSR process emission factor [listed above] x (0.80 for Manual <or> 0.85 for Mechanical)																			
Covered-Cure without Roll-Out	Non-VSR process emission factor [listed above] x (0.50 for Manual <or> 0.55 for Mechanical)																			

Emission Rate in Pounds of Methyl Methacrylate Emitted per Ton of Gelcoat Processed

MMA content in gelcoat, % ⁽⁶⁾	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	≥20
Gel coat application ⁽⁷⁾	15	30	45	60	75	90	105	120	135	150	165	180	195	210	225	240	255	270	285	0.75 x %MMA x 2000

Notes

- 1 Including styrene monomer content as supplied, plus any extra styrene monomer added by the molder, but before addition of other additives such as powders, fillers, glass,...etc.
- 2 Formulas for materials with styrene content < 33% are based on the emission rate at 33% (constant emission factor expressed as percent of available styrene), and for styrene content > 50% on the emission rate based on the extrapolated factor equations; these are not based on test data but are believed to be conservative estimates. The value for "% styrene" in the formulas should be input as a fraction. For example, use the input value 0.30 for a resin with 30% styrene content by wt.
- 3 The VSR reduction factor is determined by testing each resin/suppressant formulation according to the procedures detailed in the *CFA Vapor Suppressant Effectiveness Test*.
- 4 SEE the *CFA Controlled Spray Handbook* for a detailed description of the controlled spray procedures.
- 5 The effect of vapor suppressants on emissions from filament winding operations is based on the *Dow Filament Winding Emissions Study*.
- 6 Including MMA monomer content as supplied, plus any extra MMA monomer added by the molder, but before addition of other additives such as powders, fillers, glass,...etc.
- 7 Based on gelcoat data from *NMMA Emission Study*.
- 8 SEE the July 17, 2001 EECS report *Emission Factors for Non-Atomized Application of Gel Coats used in the Open Molding of Composites* for a detailed description of the non-atomized gelcoat testing.
- 9 Use the equation ((0.4506 x %styrene) - 0.0505) x 2000 for gelcoats with styrene contents between 19% and 32% by wt.; use the equation 0.185 x %styrene x 2000 for gelcoats with less than 19% styrene content by wt.

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 02/05/97)

Abbreviations and Acronyms:

°F: Degrees Fahrenheit
BACT: Best Available Control Technology
CFR: Code of Federal Regulations
DEP: State of Florida, Department of Environmental Protection
DARM: Division of Air Resource Management
EPA: United States Environmental Protection Agency
F.A.C.: Florida Administrative Code
F.S.: Florida Statute
ISO: International Standards Organization
LAT: Latitude
LONG: Longitude
MMBtu: million British thermal units
MW: Megawatt
ORIS: Office of Regulatory Information Systems
SOA: Specific Operating Agreement
UTM: Universal Transverse Mercator

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.

Code of Federal Regulations:

Example: [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

**Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
(version dated 02/05/97) (continued)**

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where:

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by permit tracking database
001 or 002 = 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC = old Air Construction Permit numbering

Appendix H-1: Permit History

A.S.A. MFG, Inc.

DRAFT/PROPOSED Permit No.: 0830104-007-AV

Facility ID No.: 0830104

E.U. ID No.	Description	Permit No.	Effective Date	Expiration Date	Project Type
All	Facility	0830104-001-AG	07/06/96	05/13/01	General Permit
All	Facility	0830104-002-AG	05/13/01	05/13/06	General Permit
All	Facility	0830104-003-AC	06/01/05	03/10/2006	Construction (mod.)
All	Facility	0830104-004-AV	07/31/05	07/31/10	Initial Title V Permit
All	Facility	0830104-005-AV	09/30/05	07/31/10	Administration Correction
All	Facility	0830104-006-AV	08/18/07	07/31/10	Revision
All	Facility	0830104-007-AV	Pending	Pending	Renewal

STATEMENT OF BASIS

A.S.A. MFG, Inc.
Facility ID No.: 0830104
Marion County

Title V Air Operation Permit Renewal DRAFT/PROPOSED Permit Project No.: 0830104-007-AV

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit is for the renewal of Title V Air Operation Permit.

This facility consists of one emissions unit (Emissions Unit ID No. 001) which regulates the fiberglass product manufacturing operations. The operation use gel coats, resins and other materials in the production of fiberglass drains/sumps for swimming pools, fiberglass wall panels for water parks and other miscellaneous fiberglass products. The use of these raw materials results in fugitive emissions of volatile organic compounds (VOCs) and Hazardous Air Pollutants (HAPs). The emissions unit is limited to emit no more than 34.1 tons of styrene, 35.8 tons of total Hazardous Air Pollutants (HAPs) and 48.7 tons of total volatile organic compounds (VOCs) per any consecutive 12 month period, respectively. Compliance with these emission limitations is demonstrated by recordkeeping. The reinforced fiberglass products manufacturing activities at this facility are regulated by 40 CFR 63 Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, which is adopted and incorporated by reference in Rule 62-204.800, F.A.C.

Compliance Assurance Monitoring (CAM) is not applicable at this facility, since there are no control devices.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Renewal application received December 16, 2009, this facility is a major source of hazardous air pollutants (HAPs).



Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

P.E. CERTIFICATE STATEMENT

PERMITTEE
A.S.A. MFG, Inc.

Air Permit No. 0830104-007-AV
Marion County

Project Type: AV05

Project Description: Title V Air Operation Permit Renewal for a Fiberglass Product Manufacturing facility.

The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological and meteorological features).

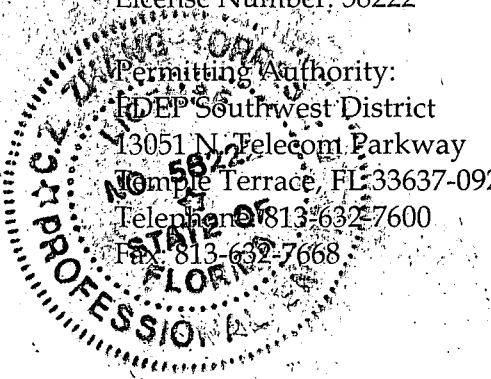
Cindy Zhang-Torres

2/24/10

C.Z. Zhang-Torres, P.E.
License Number: 58222

Date

Permitting Authority:
FDEP Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813-632-7600
Fax: 813-632-7668



SWD INTERNAL PERMITTING MEMORANDUM

TO: Mara Grace Nasca
District Air Program Administrator

THRU: Cindy Zhang-Torres, P.E. *CJ*
Air Permitting Manager

FROM: Danny Stubbs *DS*
Air Permit Engineer

DATE: 02/24/2010

SUBJECT: Draft/Proposed Permit No: 0830104-007-AV
Facility Name: A.S.A. MFG, Inc.

Day 90: 3/16/2010

On December 16, 2009, A.S.A. MFG, Inc submitted an application to renew their Title V Air Operation Permit. The facility is a fiberglass products manufacturing facility that produces fiberglass drains/sumps for swimming pools, fiberglass wall panels for water parks, and other miscellaneous fiberglass products. The facility is classified as a Title V facility and is subject to the requirements of 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

The compliance status of the facility was reviewed by Mr. James Burkholder. His comments were received via email on December 30, 2009. He stated that the facility was last inspected on September 29, 2009, and was in compliance.

The enforcement status of the facility was reviewed by Ms. Linda Novak. Her comments were received via email on December 16, 2009. She stated that the facility currently has no open or closed violation.

This project did not require a RAI letter.

The Recordkeeping and Reporting section of the renewal permit was updated to include recordkeeping for individual and total HAPs. Appendix SS-1 was included as an attachment in previous permits (i.e., 0830104-006-AV); however, this facility is not required to perform a stack test because there are no true stacks, only fan exhaust. As a result, Appendix SS-1 will not be included as a part of the renewal permit. Additionally, there was language included in the Statement of Basis that referenced 2 stacks, allowable minimum volumetric flow rates, and EPA test methods for compliance. This language was not valid and as result, will not be included in the renewal permit package.

I recommend issuance of the permit.