

Southern Environmental Sciences, Inc.

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SWD

June 26, 2003

Ms. Cindy Phillips, PE
FDEP, Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

JUN 30 2003

BUREAU OF AIR REGULATION

Mr. Doug Neeley
Air, Pesticides, and Toxics Management Division
USEP Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Re: 40 CFR Part 63, Subpart A – Initial Notifications
Hydro Spa Ocala Facility
ARMS ID No.: 0830151

Dear Ms. Phillips and Mr. Neeley:

On behalf of Hydro Spa, I am providing the Initial Notification for the Ocala Facility in accordance with the requirements of 40 CFR 63.9. Please be advised that the facility submitted an application for a state air construction permit to the FDEP's Southwest District Office on February 12, 2003. In reviewing the application, the District Office has issued two RAI letters (March 6, 2003 & May 15, 2003). On April 30, 2003, a response to the first RAI was provided. This notification is part of the package being provided in response to the second RAI Letter and a meeting with the District Office. Four (4) copies of the DEP Form 62-210.900(1) (Effective: 2/11/99) have been provided to the District Office as part of our response package should you need a copy.

In accordance with 40 CFR 63.9 the following additional information is provided:

- Physical Address: Mark III Industrial Park, 5401 44th Avenue, NW, Ocala, Florida 24482 – Marion County.
- Standard: 40 CFR Part 60, Subpart WWWW – National Emissions Standards for Hazardous Air pollutants: Reinforced Plastic Composites Production. The facility is a new source having commenced construction after August 2, 2001. Based on the effective date (April 23, 2003) the source is required to in compliance with the applicable standards upon startup.
- Description: The facility is engaged in the manufacture of Spa Pools using the Open Mold process. The facility has elected to cap emission of total hazardous air pollutants (HAPS) at 98 tons per year through a federally-enforceable permit restriction. Emissions will be controlled in accordance with the requirements of Table 3 and 4 through the use of low HAP content resins (<38.4%), the use of both mechanical (non-atomized) and manual application techniques, and use of non-HAP containing solvents for cleanup activities. The primary source of emissions is the resin application process. Miscellaneous activities include spray foam application, cleanup activities, use of piping primers/glues, wood working activities and the use of water-based stains (Surface Coating). The operation has been assigned Emissions Unit ID No.: 001.
- The facility is a major source under the HAP and Title V Programs based on HAP emissions (Styrene > 10 & 25 TPY) and a minor source under the PSD Program based on VOC emissions (<250 TPY).

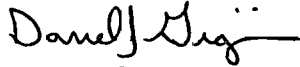
Please be advised that the facility has commenced operations and that the District Office has issued a Warning Letter (#WL03-0011AS42SWD) for the construction and operation of the facility without permits. Based on discussions with the District Office, March 11, 2003 is considered the official date that operations commenced.

Based on the final MACT Standard, the facility's operations are in compliance with the applicable emission limits of Table 3 and the applicable Work Practices of Table 4. Hydro Spa was elected to cap emissions below the 100 TPY threshold as allowed by the regulation to avoid the need for add-on controls.

Should you have any questions please feel free to contact either myself at 813-752-5014 or Mr. Charles Wiley at 727-573-9611.

Very truly yours,

SOUTHERN ENVIRONMENTAL
SCIENCES, INC.



Darrel J. Graziani, PE
Permitting Manager

DJG/dg