



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

VIA Certified Mail Return Receipt
March 6, 2003

Mr. Charles Wiley
Production Supervisor
Hydro Spa
13055 49th Street North
Clearwater, FL 33762

Re: Request for Additional Information
Regarding Air Construction Permit Request, Dated January 24, 2003
DEP Project No. 0830151-001-AC
Hydro Spa Ocala

Dear Mr. Wiley:

On February 12, 2003, the Department received your request to modify an existing building (previously owned by another company) for spa manufacturing. However, in order to process the application, the Department will need the following additional information pursuant to Rules 62-4.050, 62-4.055 and 62-4.070(1), F.A.C.

Should your response to any of the below require new calculations, please submit the new calculations, assumptions, reference material and appropriate pages of the application form (DEP Form 62-210.900(1) Effective 2/11/99). Please note that up to date versions of the application form can be down loaded from the Department's webpage:

<http://www.dep.state.fl.us/air/forms/application.htm#airpermit>.

1. Section II. Facility Information, Subsection B. Facility Pollutants. The VOC emissions are listed as 20 TPY. This estimate seems low as the MEK and TPD were estimated at 47 TPY and 32 TPY, respectively. Are the 20 TPY other VOCs? Please explain. Also, please provide the total HAPs for this facility.
2. Section II. Facility Information, Subsection C. Facility Plot Plan and Document 2. An area on the facility plot plan is noted as "Existing Booths Not Used." What booths are these and if they are paint booths are there plans to put them in use for painting or another activity? Or are there plans to dismantle them? Please explain.
3. Section II. Facility Information, Subsection C. Facility Plot Plan and Document 2. A portion of the building was labeled as off-line operations, including woodwork and electrical tasks,

"More Protection, Less Process"

Printed on recycled paper.

Hydro Spa
Hydro Spa Ocala
Request for Additional Information
Facility ID 0830151
March 6, 2002
Page 2 of 3

on the facility plot plan. Woodshop activities are noted in the insignificant list. Please confirm if the offline operations includes the woodshop. Also please note if there are any venting or building fans installed near these activities.

4. Section II. Facility Information, Subsection C. Facility Plot Plan, Process Flow Diagram and Document 2. Storage of resins and miscellaneous VOC/HAP containing materials were not indicated on the drawings. Please provide information regarding how these materials will be stored and what reasonable precautions will be taken to minimize spill, odors, and emissions.
5. Section III. Emissions Unit Information, Subsection A. General Emissions Unit Information, Page 13. Hydro Spa indicated that the emissions were uncontrolled. As odors could possibly be a problem, please provide information on activities and reasonable precautions to be taken that will minimize odors and emissions.
6. Section III. Emissions Unit Information, Subsection C. Emissions Unit Regulations. The Reinforced Plastic Composites Production MACT, 40 CFR 63 Subpart WWWW (<http://www.epa.gov/airlinks/airlinks3.html>) just became a final regulation. In order to determine if your facility's products meet the definition of "large open molding part," please provide the dimensions of the spas to be produced at this facility. EPA defines the large open molding part as a part that, when the final finished part is enclosed in the smallest rectangular six-sided box into which the part can fit, the total interior volume of the box exceeds 250 cubic feet, or any interior sides of the box exceed 50 square feet,
7. Section III. Emissions Unit Information, Subsection E. Segment (Process/Fuel) Information. In Segment 1 for the resin application, the maximum monthly rate and maximum annual rate (fields 4 and 5) were left blank. Please clarify or correct and re-submit this information. Also, in Segment 2, the maximum hourly and annual rates fields refer to the VOC calculation page. In the VOC potential to emit calculation field 8 of Subsection G. Emissions Unit Pollutant Detail Information, the maximum tons used is not clear. To clarify and avoid confusion, please provide the information either in fields 4 and 5 or field 10 of the Subsection E. Segment (Process/Fuel) Information and re-submit the form. Also, please indicate if there are any other operations that will be ongoing at the facility (e.g. polymer casting).
8. Section III. Emissions Unit Information, Subsection F. Emissions Unit Pollutants and Subsection G. Emissions Unit Detail Information. Total HAPs should also be included. Please re-submit corrected forms with the Total HAPs.
9. Section III. Emissions Unit Information, Subsection G. Emissions Unit Detail Information, Styrene. Please indicate the styrene content in the resin as well as the method of application to document the origination of the 83 lb/ton emissions factor used.
10. Section III. Emissions Unit Information, Subsection G. Emissions Unit Detail Information, Methylene Diphenyl Diisocyanate (MDI). Please provide a print out or copy showing where the emissions factor of 0.014 lbs MDI/hour came from or how it was derived based on the MDI Emissions Estimator Program.

Hydro Spa
Hydro Spa Ocala
Request for Additional Information
Facility ID 0830151
March 6, 2002
Page 3 of 3

11. Section III. Emissions Unit Information, Subsection G. Emissions Unit Detail Information, Methyl Ethyl Ketone (MEK). According to the MSDS provided, Cadox contains 2% MEK and 35% Methyl Ethyl Ketone Peroxide (MEKP). MEKP is a different organic compound than MEK. Is the applicant assuming that 100% of the MEKP reacts to form MEK? Please clarify the emissions estimate and, if applicable, how MEKP converts to form MEK.
12. Section III. Emissions Unit Information, Subsection G. Emissions Unit Detail Information, VOC (non-styrene). See item 1 of this correspondence. The VOC (non-styrene) seems low as the sum of MEK, MDI, and TPD would be greater than 20.2 TPY. Please clarify and if applicable correct this estimate. Please explain the basis of 0.78 ton VOC/ton MEKP. It was not clear in the MSDS provided. Please highlight on the MSDS, the basis for the VOC content as used in the emissions estimate.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature.

The Department must receive a response from you no later than May 9, 2003. If you have any questions, please let me know at (813)744-6100 x117.

Sincerely,



Ann Quillian, P.E.
Air Permit Engineer

cc: James C. Andrews, Jr., P.E., Southern Environmental Sciences, Inc.

[0830151001Acinc30603.doc]

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OFFICIAL USE	
Postage \$	
Mr. Charles Wiley Production Supervisor Hydro Spa 13055 49th Street North Clearwater, FL 33762	
Sen	03/07/2003
Street or P.O. Box	
City, State, ZIP+4	
PS Form 3800, January 2001	See Reverse for Instructions

7001 1940 0006 5799 6019