



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

May 15, 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. On April 30, 2003, the Department received your response, via your consultant Southern Environmental Sciences, Inc., to the Department's March 6, 2003 request for additional information. However, in order to process the application, the Department will need the following additional information pursuant to Rules 62-4.050 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. Per the DEP Form No. 62-210.900(1) instructions, only regulated pollutants should be included in the application. A copy of the form directions for this section is included with this letter. Methyl ethyl ketone peroxide, Trimethyl pentane diol 1,3 diosobutyrate, and Isopropanol may be part of the regulated pollutant VOCs (non-styrene) total but are not regulated pollutants as listed

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separately. Acetone is also not a regulated pollutant (see item 2 of this correspondence). Please re-submit this information with only the regulated pollutants. The applicant may indicate in the comment field of Section III. Emissions Unit Information, Subsection G. Emissions Unit Detail Information for the non-styrene VOCs total what compounds make up the total.

2. Section II. Facility Information, Subsection B. Facility Pollutants. The definition of Volatile Organic Compound (VOC) can be found in 40 CFR 51.100(s) and Rule 62-210.100 (280). Note in each acetone is part of the list of compounds excluded from this definition due to negligible photochemical reactivity. Please re-submit this form with out acetone. Also re-calculate all non-styrene VOC emissions without acetone (see item 4 of this correspondence).
3. Section III. Emissions Unit Information, Subsection E. Segment (Process/Fuel) Information. In the Department's March 6, 2003 request for additional information, the following was requested: *"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."* Your response indicated that information for fields 4 and 5 for Segment 2 was "almost impossible" to obtain. Yet fields 4 and 5 for Segment 2 refer to the VOC calculation page and the VOC calculation page's method of compliance is "...demonstrated through accurate record-keeping of material usage and limiting spa production to 50,000 per year." As indicated in the Department's March 6, 2003 letter, this reference to the VOC calculation page is confusing and unclear. What information specifically in Subsection G. Emissions Unit Pollutant Detail Information for VOC (non-styrene) is the applicant referring? Please provide the information in field 10 of the Subsection E. Segment (Process/Fuel) Information, if it will not fit into fields 4 and 5 of the Subsection E. Segment (Process/Fuel) Information form.
4. Section III. Emissions Unit Information, Subsection F. Emissions Unit Pollutants and Subsection G. Emissions Unit Detail Information. See items 1 and 2 of this correspondence. Please re-submit the application forms for only the regulated pollutants emitted from this facility. For the total non-styrene VOCs, please indicate the total VOCs as total non-styrene VOCs in Subsection F. Emissions Unit Pollutants. Also as indicated above, please re-calculate all non-styrene VOC totals excluding acetone (see item 2 of this correspondence) and re-submit the corrected information and application forms.
5. Item 10. of Department's March 6, 2003 Request for Additional Information. The Department has reviewed the formula from the MDI Emissions Estimator that was used to provide a MDI emissions estimate of 0.005 lbs (MDI) per hour. How did the applicant estimate a MDI Concentration of 0.0319 ppmv in the exhaust air and the exhaust airflow rate of 10,000 cfm?

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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 June 30, 2003. If you have any questions, please let me know at (813)744-6100 x117.

Sincerely,



Ann Quillian, P.E.
Air Permit Engineer

Enclosure

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

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Mr. Charles Wiley Production Supervisor	
(E)	Hydro Spa
(R)	13055 49th Street North
(E)	Clearwater, FL 33762
T	0830151-001-AC
Ser.	05/15/2003
Siz or PO Box No.	
City, State, ZIP+4	
PS Form 3800, June 2002	
See Reverse for Instructions	

62-296.404(3)(c)1.b. (where it is necessary to go to a greater level of detail than section)

Local: Will vary in format from county to county.

Note: The Department maintains a core list of rules to which all Title V sources are presumptively subject. To help in completing this section of the form, the core list may be referenced in its entirety, or with specific exceptions.

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. **Pollutant Emitted** - Enter, in this column, the identification code as listed in Appendix D of each pollutant the facility emits, has the potential to emit, or, after any proposed construction or modification, would emit or have the potential to emit in a major amount; each pollutant for which the facility's emissions are, or would be, synthetically limited to less than a major amount; and each pollutant which is, or would be, subject to an emissions limitation or work practice standard at one or more emissions units within the facility. If a code is not listed for the pollutant, enter a narrative description of the pollutant. Major source thresholds are as follows:

- a. 100 tons per year for CO, NO_x, PM₁₀, SO₂, and VOC;
- b. 5 tons per year for Pb and Pb compounds expressed as lead;
- c. 10 tons per year for any HAP (H001 through H189);
- d. 25 tons per year for HAPS (total HAPs, all species); and
- e. 100 tons per year for any other regulated pollutant.

Regulated pollutant, for purposes of this entry, means any pollutant to which an emissions limitation or work practice standard applies at one or more emissions units within the facility under any applicable requirement or pursuant to the facility's most recent air permit.

2. **Pollutant Classification** - Enter, in this column, the pollutant classification code from the list below for each pollutant identified in Column 1.

Code Description

A Major pollutant

SM Synthetic minor pollutant

B Regulated pollutant, not major or synthetic minor

3. **Requested Emissions Cap** - Fields 3-5 must be completed only for those pollutants for which the applicant proposes to establish a multi-unit or facility-wide emissions cap. Enter the rate of emissions of the pollutant, in pounds per hour, tons per year, or both, that the group of units or facility would be limited to as a specific condition of its permit. A multi-unit or facility-wide emissions cap occurs only when the group of emissions units or the facility as a whole is limited to an amount of emissions less than the sum of the potential

emissions of the individual emissions units. For example, if two emissions units are each permitted to operate 8760 hour per year, but together are limited to 12,000 total hours of operation, the result is an emissions cap. Do not request, as a multi-unit or facility-wide emissions cap, any restriction on potential emissions that results directly from restrictions placed on the potential emissions of individual emissions units. Use Field 5, Pollutant Comment, to list the ID numbers of all emissions units included in a multi-unit emissions cap.

4. **Basis for Emissions Cap** - Enter from the list below the code which corresponds to the basis for the emissions cap requested for this pollutant. Use Field 5, Pollutant Comment, to further explain any entry made.

<u>Code</u>	<u>Basis for Emissions Cap</u>
RULE	Emissions cap required by rule (Specify rule in comment field)
ESCTH	Requested by applicant to allow facility to escape classification as a major source of hazardous air pollutants
ESCPD	Requested by applicant to allow facility or modification to escape prevention of significant deterioration (PSD) preconstruction review
ESCNA	Requested by applicant to allow facility or modification to escape nonattainment area (NAA) preconstruction review
ESCM	Requested by applicant to allow facility or modification to escape maximum achievable control technology (MAC) requirements
ESCR	Requested by applicant to allow facility to escape reasonably available control technology (RACT) requirements
AMBI	Requested by applicant to reduce impact of facility on ambient concentrations (Explain further in comment field)
BUBBL	Requested by applicant pursuant to the "bubble" rule.
OTHER	Requested by applicant for other reasons (Explain in comment field)

5. **Pollutant Comment** - Enter any comments about the pollutant addressed in this set of Fields 3-5. If a multi-unit emissions cap is requested, list the ID numbers of all emissions units included in the cap. In addition, provide any explanation needed to further understand the basis for the emissions cap. For example, if the emissions cap is the result of emissions trading among two or more emissions units, identify the emissions units involved and explain how the trading is implemented.

C. FACILITY SUPPLEMENTAL INFORMATION

This subsection of the Application for Air Permit form provides supplemental information related to the facility as a whole. (Supplemental information related to individual emissions units