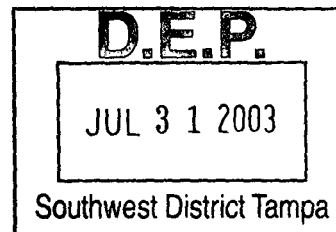


Southern Environmental Sciences, Inc.

1204 North Wheeler Street • Plant City, Florida 33563-2354 • (813) 752-5014 • Fax: (813) 752-2475

July 29, 2003

Mr. Quaid M. Noor
Permit Engineer
FDEP – Division of Air Resource Management
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619



Re: Hydro Spa Ocala Facility
ARMS ID No.: 0830151
July 23, 2003 Request for Additional Information (RAI) Letter

Dear Mr. Noor:

In response to the RAI and our meeting on July 28, 2003, enclosed please find four (4) copies of the following:

- Revised Page 11 listing VOCs as "A" and an added note that the pollutant is major under the Title V Program and minor under the PSD Program. As discussed, a 245 ton per year cap has also been requested and the basis of the cap listed at ESCPSD.
- Page 23 has been revised based on our meeting. Please note that the VOC emissions are estimated (Document ID FSI-06, Emission Estimates) below the PSD major source threshold and the requested cap of 245 tons per year.
- Page 24, Allowable Emissions – Please note that the emissions cap on Page 11 is to avoid the add-on pollution control requirements of the MACT Standard. The allowable emissions section is correctly referenced to the Rule (Specifically Table 3, Open Molding Operations, MACT Standard). The ESCMACT has been added to the section as requested. When the permit is issued, it will contain at least two specific conditions related to allowable emissions. This will include the following:
 - Cap on HAP emissions and the reference to the cap will be "As Requested by the Applicant."
 - HAP Limits on specific activities (Open Molding & Tooling Resin) as noted in the Segment Information and the reference to the limits will be "40 CFR Part 63, Subpart WWWW – Table 3." It is suspected that a copy of the Table will become part of the permit as either an attachment or as a specific condition.
- An additional Page 24 has been added as requested to reflect the VOC emission estimates and the requested cap.

Please note that the permitting strategy for the Ocala Facility is different from that of the Clearwater Facility. The main difference is that the Ocala Facility is a "New" facility under the MACT Standard. As a new facility, add-on air pollution controls are required if HAP emissions are greater than 100 tons per year. This would not be economically feasible for the Ocala Facility and as such the owners decided to take a cap on HAP emissions.

Mr. Noor
July 29, 2003

Response to the July 23, 2000 RAI


The Clearwater Facility is an "Existing" facility under the MACT Standard. At an existing facility, add-on air pollution controls are not required for open molding activities. In this case, the permitting strategy calls for limiting VOC emissions below the major source levels to avoid PSD applicability, specially a BACT Determination. Total HAP emissions follow VOC emissions and a cap on resin usage and VOC emissions has been requested. This will mean that both VOC and HAP emissions will be regulated at the Clearwater Facility.

Both facilities will be required to track materials and usages for purposes of demonstrating compliance with the MACT Standards (Table 3) and the requested emission caps. The recordkeeping requirements are part of the MACT Standard and HAPs will be tracked accordingly. Both facilities will also track VOCs to demonstrate HAP contents and VOC emissions.

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

CC: C. Wiley, HYDRO SPA

DJG/dg

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

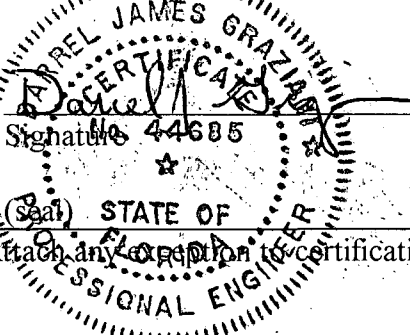
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.



7-29-03
Date

Hydro Spa, 7/23/03 RAI

* Attach any exception to certification statement.

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
HAPS	A		98	ESCMACT	Avoid Add-on Controls
H163	A				Styrene
VOC	A		245	ESCPSD	Minor – PSD Major – Title V

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
HAPS	102		EL
H163			NS
VOC			EL

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour 230 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Mass Balance Reference:		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): See Document ID No FSI-06			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): POTENTIAL EMISSION			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPD		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 245 tons per year		3. Equivalent Allowable Emissions: lb/hour tons/year	
3. Method of Compliance (limit to 60 characters): Recordkeeping System (Same for HAPs under 40 CFR Part 63, Subpart WWWW)			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: HAPS		2. Total Percent Efficiency of Control: MACT Floor	
3. Potential Emissions: lb/hour		98.0 tons/year	4. Synthetically Limited? <input checked="" type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 87 lb-HAPS per ton of Resin Reference: 40 CFR Part 63, Subpart WWWW		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): <p align="center">See Document ID No FSI-06</p>			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): <p align="center">POTENTIAL EMISSION = ALLOWABLE EMISSIONS Based on Open Molding non-CR/HS Resin</p>			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE/ESCMACT		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 98.0 Tons per year of HAPS		3. Equivalent Allowable Emissions: lb/hour tons/year	
3. Method of Compliance (limit to 60 characters): <p align="center">Recordkeeping System Per 40 CFR Part 63, Subpart WWWW</p>			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <p>The requested cap includes allowable emissions identified in 40 CFR Part 63, Subpart WWWW, Table 3 for Open Molding Operations.</p>			



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

July 23, 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 June 27, 2003, the Department received your response, via your consultant Southern Environmental Sciences, Inc., to the Department's May 15, 2003 request for additional information. However, in order to continue processing 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.:

1. Refer to Section IIB, Facility Pollutants, Page 11 of permit application, VOC exceeds the Title V major source threshold of 100 tons per year and minor source under Preconstruction Review Program based on potential emissions of less than 250 tons per year. Therefore, please reclassify the VOC from B to A or SM, specify an emission cap of less than 250 tons per year and provide a basis for emission cap, e.g., ESCPSD.
2. Refer to Section IIIF, Emission Unit Pollutants, Page 23 of permit application, please replace VOC pollutant regulatory code with EL since VOC limit will be established to control the potential to emit (PTE) to less than 250 tons per year to escape PSD.
3. Refer to Section IIIG, Emission Unit Pollutant Detail Information, Page 24, basis for allowable emission code needs to be ESCMACT to be consistent with Facility Pollutant Emission Cap at page 11.

"More Protection, Less Process"

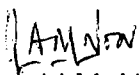
Printed on recycled paper.

4. Refer to Section IIIG, Emission Unit Pollutant Detail Information, Page 24, please add another page for VOC to provide information about potential emissions, allowable emissions and method of compliance to escape PSD requirements.

NOTE - Rule 62-4.050(3), F.A.C. requires applications of this type 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. Therefore, your response to the above requests should be certified by a professional engineer.

Your response should be received at SWD by 09/06/2003. If you have any questions, please let me know at (813)744-6100 extension 112.

Sincerely,


Quaid M. Noor
Air Permitting Engineer
Southwest District, Tampa

Attachments

cc: ✓ Darrel J. Graziani, P.E., Southern Environmental Sciences, Inc.