



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

Mr. Charles Wiley  
Production Supervisor  
HYDRO SPA  
13055 49<sup>th</sup> Street, North  
Clearwater, FL 33762

Re: Initial Title V Air Operation Permit  
DRAFT Title V Permit No. 0830151-002-AV  
HYDRO SPA – Ocala Facility

Dear Mr. Wiley:

One copy of the DRAFT Title V Air Operation Permit for the HYDRO SPA located at 5401 44<sup>th</sup> Avenue, NW, Ocala, Marion County, is enclosed. The permitting authority's "INTENT TO ISSUE AN INITIAL AIR POLLUTION TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN INITIAL AIR POLLUTION TITLE V AIR OPERATION PERMIT" are also included.

An electronic version of the DRAFT Permit has been posted on the Division of Air Resources 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/permitting/airpermits/AirSearch\\_ltd.asp](http://www.dep.state.fl.us/air/permitting/airpermits/AirSearch_ltd.asp)"

The "PUBLIC NOTICE OF INTENT TO ISSUE AN INITIAL AIR POLLUTION TITLE V AIR OPERATION PERMIT" 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 Jerry Kissel, P.E., at the above letterhead address. If you have any other questions, please contact Quaid Noor, at (813) 744-6100, ext. 112.

Sincerely,

Gerald J. Kissel, P.E.  
District Air Program Administrator  
Southwest District

GJK\qn  
Enclosures  
[electronic file name: 0830151-002-hydrospa\_av-d-int.doc]

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# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

In the Matter of an  
Application for Construction/Permit Renewal by:

HYDRO SPA  
13055 49<sup>th</sup> Street, North  
Clearwater, FL 33762 /

DRAFT Permit No.: 0830151-002-AV  
HYDRO SPA  
Marion County

## INTENT TO ISSUE AN INITIAL AIR POLLUTION TITLE V AIR OPERATION PERMIT

The Florida Department of Environmental Protection (permitting authority) gives notice of its intent to issue an Initial Air Pollution Title V Air Operation Permit (copy of DRAFT attached) for the Title V source detailed in the application specified above, for the reasons stated below. This is an initial Title V Air Operation Permit No. 0830151-002-AV.

The applicant, HYDRO SPA, applied on January 26, 2005, to the permitting authority for an Initial Air Pollution Title V Air Operation Permit for the Hydro Spa, Ocala Facility. The facility consists of a reinforced plastic composites production operation and is located at 5401 44<sup>th</sup> Avenue, NW, Ocala, Marion County, FL 34482.

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 construction and Title V permitting procedures. The permitting authority has determined that an air pollution construction permit and Title V Air Operation Permit Renewal is required to commence or continue operations at the described facility.

The permitting authority intends to issue this construction permit and 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 AN INITIAL AIR POLLUTION TITLE V AIR OPERATION PERMIT". 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, 3804 Coconut Palm Drive, Tampa, FL 33619,

*"More Protection, Less Process"*

*Printed on recycled paper.*

Telephone: (813) 744-6100; Fax: (813) 744-6458, 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.

The permitting authority will issue the PROPOSED Permit, and subsequent FINAL Permit, in accordance with the conditions of the attached DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the draft Title V permit renewal for a period of 30 (thirty) days from the date of publication of the PUBLIC NOTICE OF INTENT TO ISSUE AN INITIAL AIR POLLUTION TITLE V AIR OPERATION PERMIT". 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 the DRAFT Permits, the permitting authority shall issue a Revised DRAFT Permits 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 the General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, FL 32399-3000, Telephone: (850) 488-9730, Fax: (850) 487-4938. 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.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

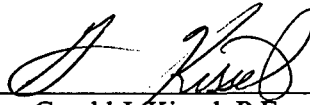
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Regarding only the Draft Title V Permit Renewal: 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 permit. Any petition shall be based only on objections to the 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 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 Tampa, Florida.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**



---

Gerald J. Kissel, P.E.  
District Air Program Administrator  
Southwest District

GJK\qn

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this "PUBLIC NOTICE OF INTENT TO ISSUE AN INITIAL AIR POLLUTION TITLE V AIR OPERATION PERMIT" (including the PUBLIC NOTICE and the DRAFT Permit) and all copies was sent by certified mail before the close of business on APR 21 2005 to the person(s) listed:

Mr. Charles Wiley  
Production Supervisor  
HYDRO SPA  
13055 49<sup>th</sup> Street, North  
Clearwater, FL 33762

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this "PUBLIC NOTICE OF INTENT TO ISSUE AN INITIAL AIR POLLUTION TITLE V AIR OPERATION PERMIT" (including the PUBLIC NOTICE and the Draft Permit) were sent by U.S. mail on the same date to the person(s) listed or as otherwise noted:

Mr. Darrel James Graziani, P.E.  
Southern Environmental Sciences, Inc.  
1204 North Wheeler Street  
Plant City, FL 33563

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this "INTENT TO ISSUE AN INITIAL AIR POLLUTION TITLE V AIR OPERATION PERMIT" (including the PUBLIC NOTICE and the Draft Permit) were sent by INTERNET E-mail on the same date to the person(s) listed:

Ms. Barbara Friday  
BAR, Director's Office  
2600 Blair Stone Road, M.S. # 5505  
Tallahassee, FL 32399-2400

Ms. Gracy Danois & Mr. Gregg Worley (to be sent by FDEP, DARM, Tallahassee via Internet)  
U.S. Environmental Protection Agency  
Region 4  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303-3104

7002 3150 0003 8458 6260

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Mr. Charles Wiley, Production Supervisor  
 HYDRO SPA 45th Street Facility  
 13055 49TH Street North  
 Clearwater, FL 33762

Sent To 0830151-002-AV ON DRAFT TV 04/21/2005

Street, Apt. No., or PO Box No.

City, State, ZIP+4

PS Form 3800, June 2002 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Charles Wiley, Production Supervisor  
 HYDRO SPA 45th Street Facility  
 13055 49TH Street North  
 Clearwater, FL 33762  
 0830151-002-AV ON DRAFT TV 04/21/2005

2. Article Number  
(Transfer from service label)

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  Addressee

*x Olga Wechter*

B. Received by (Printed Name) C. Date of Delivery

*4/22/05*

D. Is delivery address different from item 1?  Yes

If YES, enter delivery address below:  No

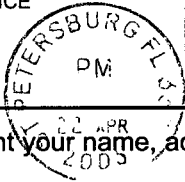
3. Service Type

Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

7002 3150 0003 8458 6260

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STATE OF FLORIDA  
Department of Environmental Protection  
Air Program  
8407 Laurel Fair Circle  
Tampa, Florida 33610

SOUTHWEST DISTRICT  
TAMPA  
APR 25 2005

PP



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)

APR 21 2005  
(Date)

"PUBLIC NOTICE OF INTENT TO ISSUE AN INITIAL AIR POLLUTION TITLE V AIR OPERATION PERMIT"

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SOUTHWEST DISTRICT

DRAFT Initial Air Pollution Title V Air Operation Permit  
Project No.: 0830151-002-AV

HYDRO SPA, Ocala Facility  
Marion County

The Florida Department of Environmental Protection, Southwest District (permitting authority) gives notice of its intent to issue an Initial Air Pollution Title V Air Operation Permit, (copy of DRAFT attached) to Hydro Spa, Ocala facility. The applicant's name and address are: HYDRO SPA, 13055 49<sup>th</sup> Street, North, Clearwater, FL 33762. Attention: Mr. Charles Wiley, Production Supervisor.

The permitting authority will issue the PROPOSED Permit, and subsequent FINAL Permit, in accordance with the conditions of the DRAFT Title V Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the draft Title V permit for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Florida Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, FL 33619. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT 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 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of the General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, FL 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.

Regarding only the Draft Title V Permit: 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 permit. Any petition shall be based only on objections to the 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 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  
8407 Laurel Fair Circle  
Tampa, FL 33610  
Telephone: 813/744-6100  
Fax: 813/744-6458

The complete project file includes the DRAFT 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 Mr. Jason Waters, P.E., at the above address, or call Mr. Quaid Noor at (813) 744-6100, ext. 112, for additional information.

Hydro Spa  
Facility ID No.: 0830151  
Marion County

Initial Title V Air Operation Permit  
DRAFT Title V Permit No. 0830151-002-AV

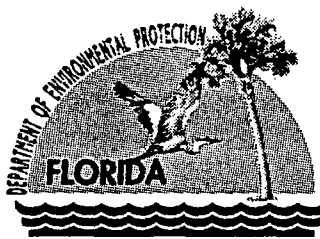
Permitting & Compliance Authority:  
Florida Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619  
Telephone: 813/744-6100  
Fax: 813/744-6458

Initial Title V Air Operation Permit

DRAFT Title V Permit No. 0830151-002-AV

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# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

Permittee:  
Hydro Spa, Ocala Facility  
13055 49<sup>th</sup> Street, North  
Clearwater, FL 34482

DRAFT Title V Permit No.: 0830151-002-AV  
Facility ID No. 0830151  
SIC Nos.: 30, 3088  
Project: Initial Title V Air Operation Permit

This permit is for the operation of the Hydro Spa, Ocala facility. This facility is located at 5401 44<sup>th</sup> Avenue, NW, Ocala, Marion County; UTM Coordinates: 17-385.35 East 3235.35 North Latitude: 29° 14' 36" North and Longitude: 82° 11' 30" West.

This Title V air operation permit 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 perform the work or 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 SS-1, Stack Sampling Facilities (version dated 10/7/96)  
Appendix TV-5, Title V Conditions (version dated 03/28/05)  
Appendix WWWW, 40 CFR Part 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production  
Table 297.310-1 (version dated 10/7/96)

Effective Date<sup>b</sup>: \*

Renewal Application Due Date<sup>b</sup>: \*

Effective Date/Expiration Date<sup>a</sup>:

Expiration Date: \*

\*(Dates will be shown at final issuance)

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

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Gerald J. Kissel, P.E.  
District Air Program Administrator  
Southwest District

GJK/qn

*"More Protection, Less Process"*

*Printed on recycled paper.*

Hydro Spa, Ocala Facility

DRAFT Title V Permit No.: 0830151-002-AV  
Project: Initial Title V Air Operation Permit

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of a reinforced plastic composites production operation. The operation involves the production of pool spas and include the preparation and repair of molds, the application of resin and fiberglass to molds, product assembly, touchup, equipment cleanup, and fugitive emissions from the lamination building. The building ventilation system is used to improve the dispersion of styrene emissions into the atmosphere to avoid and/or minimize odor impacts off site.

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

Based on the initial Title V Air Operation Permit application received January 26, 2005, this facility is a major source of hazardous air pollutants (HAPs).

*{Permitting Note: This facility including the use of molds and the application of resin is subject to the MACT standards of 40 CFR 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, promulgated by the U.S. EPA on April 21, 2003 for new sources. The new MACT requirements are incorporated in this initial Title V operation permit.}*

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

E.U.

ID No.

Brief Description

001

Reinforced Plastic Composites Production Facility and Associated Activities

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

Hydro Spa, Ocala Facility

DRAFT Title V Permit No.: 0830151-002-AV  
Project: Initial Title V Air Operation Permit

#### 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/ID Number Changes  
Table 1-1, Summary of Air Pollution Standards and Terms  
Table 2-1, Summary of Compliance Requirements  
Statement of Basis

These documents are on file with permitting authority:  
Initial Title V Air Operation Permit received and complete January 26, 2005

#### Subsection D. Miscellaneous

*The use of "Permitting Notes" throughout this permit are for informational purposes only and are not permit conditions.*



Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-5, TITLE V CONDITIONS, is a part of this permit.

*{Permitting note: APPENDIX TV-5, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}*

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. An objectionable odor is 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. The doors and windows shall be closed whenever feasible to ensure that materials which emit VOC emissions from the materials containing VOC's are captured and exhausted through the stacks with adequate dispersion to prevent objectionable odors. If the Department receive a valid odor complaint, the Department reserves the right to require additional odor control measures/work practices be implemented.  
[Rule 62-296.320(2), 62-210.200(181) F.A.C.]

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:

Hydro Spa, Ocala Facility

DRAFT Title V Permit No.: 0830151-002-AV  
Project: Initial Title V Air Operation Permit

RMP Reporting Center  
Post Office Box 1515  
Lanham-Seabrook, MD-20703-1515  
Telephone: 301/429-5018

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. General Pollutant Emission Limiting Standards. Volatile Organic Compounds or Organic Solvent Emissions – The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvent (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The facility shall comply with the following operating procedure and work practice relating to VOC/OS use and emissions:

- A. Fans and ventilation systems, as described below, located in the reinforced plastic composite production building shall be operating whenever usage of material containing VOC/OS occurs and shall remain operating for at least 1 hour after the usage has been completed. The production building has six exhaust stacks with diameters varying from 24 inches to 30 inches. The air flow through the stacks vary from approximately 10,084 acfm to 13,630 acfm.
- B. All materials containing VOC/OS's shall be stored in closed containers and/or in small automatic closing safety cans.
- C. Clean-up solvent washings shall be directed into containers that prevent evaporation into the atmosphere.
- D. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of materials containing VOC/OS's.
- E. Immediately attend to all spills of materials containing VOC/OS's as appropriate.

[Rules 62-4.070(3) & 62-296.320(1)(a), F.A.C.]

*{Permitting Note: Additional work practices are included in Table 4 of the attached 40 CFR 63, subpart WWWW.}*

6. 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.]

7. Unconfined Emissions of Particulate Matter - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter resulting from buffing, polishing, carving, cutting, drilling, routing, sanding, sawing, trimming, machining, surface grinding, or turning at this facility. Reasonable precaution to be taken include the following:

- A. Paved parking and trafficked areas shall be maintained and kept free of particulate matter build-up.
- B. Proper disposal of wastes (e.g., saw dust, pipe cutting etc.) in an industrial dumpster.
- C. Sprinkling with water shall be used as necessary on paved and unpaved areas and in the dumpster.
- D. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particular matter.

[Rules 62-296.320(4)(c), and 62-4.070(3) F.A.C.]

{Permitting Note: (see Condition 57. of APPENDIX TV-5, TITLE V CONDITIONS)}

8. MACT Applicability – As a major source of HAP emissions, the source is subject to the emission limiting standards and work practice requirements contained in Tables 3 and 4 of the promulgated MACT Standard for 40 CFR Part 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, and shall comply with these standards and requirements. An amended version of the 40 CFR Part 63, Subpart WWWW applicable to this facility is attached as a part of this permit.

[Rule 62-213.440(1), F.A.C.]

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

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

10. Records Update - At a minimum, all records and logs required by this permit shall be updated monthly, by the 30<sup>th</sup> day of the next month. (Also reference appendix TV-4, items 12.(14)(b) and (c) and 42.)

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

Hydro Spa, Ocala Facility

DRAFT Title V Permit No.: 0830151-002-AV  
Project: Initial Title V Air Operation Permit

11. Statement of Compliance - The semi-annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C. shall be submitted to the Air Compliance Section of Southwest District Office of the Department and U.S. EPA using DEP Form No. 62-213.900(7), F.A.C. after compliance date. The compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semi-annual reporting period from January 1 through June 30, and from July 1 through December 31 respectively.

[40 CFR 63.5910, Rules 62-213.440(3), 62-213.420(4), and 62-213.900, F.A.C.]

{*Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of Appendix TV-5, TITLE V CONDITIONS, and, 40 CFR 63.5910 of Subpart WWWW)*}

12. Compliance Notification to the Department - 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  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8218  
Telephone: 813/744-6100  
Fax: 813/744-6458

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

13. EPA Notification - 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 & Toxic 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

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

14. Certification by Responsible Official (RO) - In addition to the professional engineering certification required for application 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.]

15. Annual Operating Report - The permittee shall submit to the Air Compliance Sections of Southwest District Office of the Department each calendar year, on or before March 1, a completed DEP Form 62-213.900 (5), an "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year containing the following information pursuant to Subsection 403.061(13), F.S.:

- a. Annual amount of materials and/or fuels utilized;
- b. Annual emissions (note calculation basis);
- c. Hours of operation.
- d. Any changes in the information contained in the permit.

[Rule 62-210.370(3), F.A.C.]

16. 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.]

17. Permit Renewal - An application for a renewal to this permit shall be submitted in accordance with the terms and conditions contained in Appendix TV-5, Condition 5.

[Rule 62-4.090, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U.

ID No.    Brief Description

-001      Reinforced Plastic Composites Production Facility and Associated Activities

This facility consists of a reinforced plastic composites production operation. The operation involves in the production of pool spas and the activities include the preparation and repair of molds, the application of resin and fiberglass to molds, product assembly, touch-up, and equipment cleanup, and fugitive emissions from the lamination building. The building ventilation system is used to improve the dispersion of styrene emissions into the atmosphere to avoid and/or minimize impacts off site.

*{Permitting note(s): This emission unit is regulated under Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards.}*

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

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation - Emissions Unit No. 001 is allowed to operate continuously, i.e., 8,760 hours/year.  
[Rules 62-210.200 (PTE), and 62-4.070(3), F.A.C.]

Emission Limitations and Standards

A.2. Hazardous Air Pollutant (HAP) – Total hazardous air pollutants emissions from this facility shall not exceed 98.0 tons in any consecutive 12-month period.  
[Construction Permit No. 0830151-001-AC]

A.3. Total Volatile Organic Compound (VOC) – Total VOC emissions from this facility, including Styrene and other HAPs that are VOCs, shall not exceed 245.0 tons in any consecutive 12-month period.  
[Construction Permit No. 0830151-001-AC]

Recordkeeping and Reporting Requirements

A.4. Recordkeeping and Reporting Requirements - The permittee shall keep monthly logs for the facility to document compliance with the limitations of Condition Nos. A.2. and A.3. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. "At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC/HAP emissions, provided that no materials are used which are not purchased. 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 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 Specific Condition Nos. A.2 and A.3. The logs shall be retained on file at the facility for atleast 2 years. The monthly logs shall include at least the following information:

- a. Facility Name, Emission Unit ID No. (E.U. 0830151 001) and Description
- b. Month, year, and method used for records (use or purchase)
- c. The monthly logs shall be completed by 30<sup>th</sup> of the following month. Daily logs (if required) shall be completed within 3 business days. Supporting documentation (MSD sheets, purchase orders, emission factors, etc.) shall be kept for each material which includes sufficient information to determine HAP emissions and VOC emissions. These records shall be made available to the Department upon request.
- d. Record the monthly quantity, in tons, of each material used that contains HAP/VOC for each category (Polyester Resin, Catalyst, Foam, non-HAP cleaning solvents, and miscellaneous materials, etc.) per each application method.
- e. Calculate and record the most recent consecutive 12-month period cumulative material usage rate (in tons per 12 consecutive month period) for each category (Polyester Resin, Catalyst, Foam, non-HAP cleaning solvents, and miscellaneous materials, etc.)
- f. For each material/product used that contains HAP/VOC, record the percentage (%) by weight of HAP along with the percentage (%) by weight of VOC.

- g. Record the monthly and the most recent consecutive 12-month total quantity, in tons, for HAPs emissions per application method and material. Record the HAP emissions to units of pounds per ton of resin applied for each method of operation.
- h. Record the monthly and the most recent consecutive 12-month total quantity, in tons, for HAPs emissions, as shown in Condition No. 12.
- i. Record the monthly and the most recent consecutive 12-month total quantity, in tons, for VOC emissions per application method and material.
- j. Record the monthly and the most recent consecutive 12-month total quantity, in tons, for VOC emissions, as shown in Condition No. 13.
- k. Documentation of the HAP emission calculation shall be determined by using the emission factors in the Table 1 of 40 CFR Part 63, Subpart WWWW. The current calculation shall use the formula:

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

\*EF = the appropriate emission factor from 40 CFR 63, Subpart WWWW, Table 1 (See Attachment). All applicable terms, conditions, and definitions, in regards to Table 1 apply, such as:

*Atomized mechanical application* means application of resin or gel coat with spray equipment that separates the liquid into a fine mist. This fine mist may be created by forcing the liquid under high pressure through an elliptical orifice, bombarding a liquid stream with directed air jets, or a combination of these techniques.

*Nonatomized mechanical application* means the use of application tools other than brushes to apply resin and gel coat where the application tool has documentation provided by its manufacturer or user that this design of the application tool has been organic HAP emissions tested, and the test results showed that use of this application tool results in organic HAP emissions that are no greater than the organic HAP emissions predicted by the applicable nonatomized application equation(s) in Table 1 to this subpart. In addition, the device must be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures. Examples of nonatomized application include flow coaters, pressure fed rollers, and fluid impingement spray guns.



Documentation of the VOC used shall be determined by a mass balance method, or appropriate emission factors.

- I. Each log shall have the appropriate footnotes listing emission factors used in calculation.
- m. 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.
- n. 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 AP-42, or other references or methods approved by the Department.

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

**APPENDIX A-1, ABBREVIATIONS, ACRONYMS, CITATIONS, AND IDENTIFICATION NUMBERS (version dated 2/5/97)**

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**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; ISO refers to those conditions at  
LAT: Latitude 288 degrees K, 60 percent relative  
LONG: Longitude humidity, and 101.3 kilopascals  
MMBtu: million British thermal units pressure.  
MW: Megawatt  
ORIS: Office of Regulatory Information Systems  
SOA: Specific Operating Agreement  
UTM: Universal Transverse Mercator

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**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.

**APPENDIX A-1. ABBREVIATIONS, ACRONYMS, CLASSIFICATIONS, AND  
IDENTIFICATION NUMBERS  
(continued)**

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**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

HYDRO SPA  
Ocala Facility

**DRAFT Permit No.:** 0830151-002-AV

**Facility ID No.:** 0830151

<u>E.U. ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Project Type</u> <sup>1</sup>
001	Reinforced Plastic Composites Production Facility and Associated Activities	0830151-001-AC	11/14/2003	12/31/2005	Construciton
001	Reinforced Plastic Composites Production Facility and Associated Activities	0830151-002-AV	on issuance	on issuance	Title V Initial

<sup>1</sup> Project Type (select one): Title V: Initial, Revision, Renewal, or Administrative Correction; Construction (new or mod), Extesion (AC only); or Withdrawn or Denied

<sup>2</sup> ARMS day 55 from the date of posting the PROPOSED Permit for EPA review (see confirmation e-mail from Tallahassee) or the date that EPA confirms resolvement of any objections

[Appendix H-1.doc]

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

HYDRO SPA  
Ocala Facility

DRAFT Permit No.: 0830151-002-AV

Facility ID No.: 0830151

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The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 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 Rule 62-210.300(3)(a), 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 Rule 62.210.300(3)(a), 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. Internal Combustion Engines associated with on-site activities including trucks, cars, motorcycles, and forklifts
2. Vacuum pumps associated with Mold Setting Activities
3. Space Heating Activities
4. Laboratory Equipment used for chemical and/or physical analyses
5. Fire and Safety Equipment
6. Surface coating activities using coatings containing 5.0 percent or less VOCs, by volume, except that such emissions shall be calculated in to the facility-wide emissions for purposes of the VOC emissions cap
7. Non-HAP and non-VOC Solvent Storage and Cleaning Activities
8. HAP and VOC Solvent Storage activities in containers of less than 55 gallons. (Excludes Bulk Storage)
9. Janitorial and Office Supplies and Materials containing small amounts of either HAPs or VOCs
10. Miscellaneous Material Usages of less than 100 pounds per year.

## APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

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Stack Sampling Facilities Provided by the Owner of an Emissions Unit. This section describes the minimum requirements for stack sampling facilities that are necessary to sample point emissions units. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. Emissions units must provide these facilities at their expense. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

(a) Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

(b) Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.

(c) Sampling Ports.

1. All sampling ports shall have a minimum inside diameter of 3 inches.

2. The ports shall be capable of being sealed when not in use.

3. The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.

4. For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.

5. On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

(d) Work Platforms.

1. Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.

2. On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.

3. On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.

4. All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

(e) Access to Work Platform.

1. Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.

2. Walkways over free-fall areas shall be equipped with safety rails and toeboards.

(f) Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g) Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

**Table 1-1, Summary of Air Pollutant Standards and Terms**

HYDRO SPA  
Ocala Facility

DRAFT Permit No.: 0830151-002-AV

Facility ID No.: 0830151

Note: This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No. Brief Description**

-001 Reinforced Plastic Composites Production Facility and Associated Activities

E.U. ID No.	Pollutant Name	Fuel(s)	Hours/Yr	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See Perm Condition(s)
				Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
001	Total HAPs		8,760			98**			EBA	III.A.2
001	Total VOC		8,760			245			EBA	III.A.3

Notes: \* The "Equivalent Emissions" listed are for informational purposes only.  
 N/A: Not Applicable      EBA: Established By Applicant      TPM: Tons Per Month      TPY: Tons Per Year  
 \*\* Total HAP limit is not federally enforceable



**Table 2-1, Summary of Compliance Requirements**HYDRO SPA  
Ocala Facility

DRAFT Permit No.: 0830151-002-AV

Facility ID No.: 0830151

Note: This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No. Brief Description**

-001 Reinforced Plastic Composites Production Facility and Associated Activities

E.U. ID No.	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See Permit Condition(s)
-001	VOCs, HAPs		Recordkeeping Logs of material usage (including purchase orders, emission factors, etc. to determine VOC/HAP emissions)	Monthly***	N/A	N/A	N/A	III.A.4.

Notes: \*Frequency base date established for planning purposes only; Rule 62-297.310, F.A.C.

\*\*CMS [=] continuous monitoring system

\*\*\* Monthly: Note: If any month results in total HAPs, and/or total VOC emissions being within 10% of its associated allowable emission limit for the prior consecutive 12-month period, the monthly log required shall be kept daily.

**TABLE 297.310-1 CALIBRATION SCHEDULE**  
 (version dated 10/7/96; note: this table is referenced in Rule 62-297.310, F.A.C.)

ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/-0.001" mean of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after each test series	Spirometer or calibrated wet test or dry gas test meter	2%
		Comparison check	5%

## **STATEMENT OF BASIS**

HYDRO SPA  
Ocala Facility  
Facility ID No.: 0830151  
Marion County

Initial Title V Air Operation Permit  
DRAFT Permit No.: 0830151-002-AV

This DRAFT Title V Air Operation Permit 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 facility consists of a spa manufacturing operation. The spa manufacturing operation includes the preparation and repair of molds, the application of resin and fiberglass to molds, product assembly, touch-up, equipment clean-up, and fugitive emissions from the lamination building. CAM does not apply.

Also included in this permit are miscellaneous insignificant emission units and/or activities placed in Appendix I-1: List of Insignificant Emission Units and/or Activities.

*{Permitting Note: This facility including the use of molds and the application of resin is subject to the MACT standards of 40 CFR 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, promulgated by the U.S. EPA on April 21, 2003 for new sources. The new MACT requirements are incorporated in this Title V operation permit renewal.}*

Based on the initial Title V Air Operation Permit application received January 1, 2005, this facility is a major source of hazardous air pollutants (HAPs).

MEMORANDUM

**TO:** Jerry Kissel, P.E., District Air Program Administrator, SWD

**THRU:** Jason Waters, P.E., District Air Permitting Supervisor

**FROM:** Quaid Noor, Air Permit Engineer QN.

**DATE:** April 18, 2005

**SUBJECT:** Hydro Spa, Ocala Facility  
DRAFT Permit Package  
Project: Initial TV Air Operation Permit  
County: Marion  
Permit Project No.: 0830151-002-AV

**DAY 90:** 4/26/05

The attached draft permit package for initial Title V Air Operation Permit, for Hydro Spa, Ocala Facility, Marion County, is for your review.

The facility consists of a reinforced plastic composites production operation and is currently coming out of a construction permit. The facility including the use of molds and the application of resin is subject to MACT standards of 40 CFR 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, promulgated by U.S. EPA on April 21, 2003 for new sources. The new MACT requirements are incorporated in this Title V operation permit renewal through an edited Subpart WWWW.

# Outlook Electronic Notification Cover Memorandum

TO: Barabara Friday & Elizabeth Walker

THRU: Jerry Kissel, P.E.  
District Air Program Administrator

THRU: Jason Waters, P.E.  
District Air Permitting Supervisor

FROM: Quaid Noor <sup>QN</sup>  
Air Permitting Engineer

DATE: April 18, 2005

RE: Initial Title V Draft Permit No. 0830151-002-AV)

The following Draft Title V Permit 0830151-002-AV has been put to the electronic file referenced below for your posting on the INTERNET. This is an initial Title V Draft Permit.

**Applicant Name:** HYDRO SPA, Ocala Facility

**County:** Marion

**Method of Transmittal:** DARM COMMON\H:\T5permit\southw\0830151\  
Project 002. Draft

**Electronic File Name:** 0830151.002.av.d.zip

The zipped file contains the following electronic files:

Appendix A-1.doc	Appendix TV-5.doc
Appendix I-1.doc	Appendix H-1.doc
Appendix SS-1.doc	Appendix WWW.doc
Table 1-1.doc	Table 2-1.doc
Table 297.310-1.doc	
0830151-002-hydrospa_av-d-int.doc	
0830151-002-hydrospa_av-d-sob.doc	
0830151-002-hydrospa_av-d-snt.doc	
0830151-002-hydrospa_av-d.doc	

[electronic file name: 0830151-002-hydrospa\_av-d-snt.doc]



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

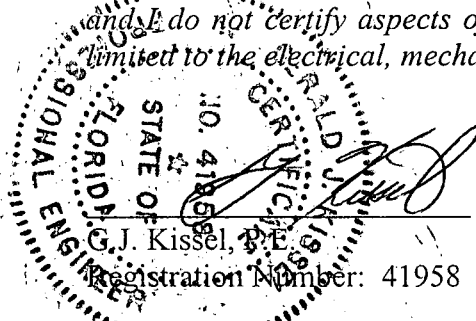
## P.E. Certification Statement

Permittee: *Hydro-Spa (Tcala)*

Permit No.: *0830151-002AV*

Project type: *Spa Mfg*

*I HEREBY CERTIFY that the 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 geological features).*



*G.J. Kissel*  
Date *4/2/05*

Permitting Authority:  
FDEP Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619  
813/744-6100 Ext 116  
Fax: 813/744-6458