

Southern Environmental Sciences, Inc.

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

July 16, 2003

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

RECEIVED

JUL 21 2003

BUREAU OF AIR REGULATION

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

Re: 40 CFR Part 63, Subpart A – Initial Notification
Hydro Spa Clearwater Facility
ARMS ID No.: 1030429-001-AV

Dear Ms. Phillips and Mr. Neeley:

On behalf of Hydro Spa, I am providing the Initial Notification for the Clearwater Facility in accordance with the requirements of 40 CFR 63.9. Please be advised that the facility will be submitting an application for a state air construction permit and Title V Permit renewal to the FDEP's Southwest District Office.

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

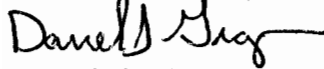
- Physical Address: Hydro Spa, 13055 49th Street North, Clearwater, Florida 33762 – Pinellas County.
- Standard: 40 CFR Part 60, Subpart WWWW – National Emissions Standards for Hazardous Air pollutants: Reinforced Plastic Composites Production. The facility is an existing source having commenced construction prior to August 2, 2001. Based on the effective date (April 23, 2003) the source is required to in compliance with the applicable standards no later than April 23, 2006.
- Description: The facility is engaged in the manufacture of Spa Pools using the Open Mold process. Emissions will be controlled in accordance with the requirements of Tables 3 and 4 through the use of low HAP content resins (<38.4%), the use of both mechanical (non-atomized) and manual application techniques, and use of non-HAP containing solvents for cleanup activities. The primary source of emissions is the resin application process. Miscellaneous activities include spray foam application, cleanup activities, use of piping primers/glues, wood working activities and the use of water-based stains (Surface Coating). The operation has been assigned Emissions Unit ID No.: 001.
- The facility is a major source under the HAP and Title V Programs based on HAP emissions (Styrene > 10 & 25 TPY) and a synthetic minor source under the PSD Program based on VOC emissions (<250 TPY).

Based on the final MACT Standard, the facility's operations are in compliance with the applicable emission limits of Table 3 and the applicable Work Practices of Table 4.

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

Very truly yours,

SOUTHERN ENVIRONMENTAL
SCIENCES, INC.



Darrel J. Graziani, PE
Permitting Manager

DJG/in

Southern Environmental Sciences, Inc.

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

September 13, 2004

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

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SEP 15 2004

BUREAU OF AIR REGULATION

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

Re: 40 CFR Part 63, Subpart A – Initial Notifications
Hydro Spa 45th Street Facility
ARMS ID No.: To Be Determined

Dear Ms. Phillips and Mr. Neeley:

On behalf of Hydro Spa, I am providing the Initial Notification for the ^{Pinellas Park} ~~Ocala~~ Facility in accordance with the requirements of 40 CFR 63.9. Please be advised that the facility will be submitting an application for a state air construction permit to the FDEP's Southwest District Office within the next several days. This notification is part of the package being to the District Office. Three (3) copies of the DEP Form 62-210.900(1) have been provided to the District Office and one copy to Pinellas County should you need a copy.

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

- Physical Address: 6101 North 45th Street, Pinellas Park, Florida 33709 – Pinellas County.
- Standard: 40 CFR Part 60, Subpart WWWW – National Emissions Standards for Hazardous Air pollutants: Reinforced Plastic Composites Production. The facility is a new source having commenced construction after August 2, 2001. Based on the effective date (April 23, 2003) the source is required to in compliance with the applicable standards upon startup.
- Description: The facility is engaged in the manufacture of Spa Pools using the Open Mold process. The facility has elected to cap emissions of total hazardous air pollutants (HAPS) at 98 tons per year through a federally-enforceable permit restriction. Emissions will be controlled in accordance with the requirements of Table 3 and 4 through the use of low HAP content resins (<38.4%), the use of both mechanical (non-atomized) and manual application techniques, and use of non-HAP containing solvents for cleanup activities. The primary source of emissions is the resin application process. Miscellaneous activities include storage and mix tanks, spray foam application, cleanup activities, use of piping primers/glues, wood working activities and the use of water-based stains (Surface Coating). The operation has been assigned Emissions Unit ID No.: 001.
- The facility is a major source under the HAP and Title V Programs based on HAP emissions (Styrene > 10 & 25 TPY) and a minor source under the PSD Program based on VOC emissions (<250 TPY).

Pinellas Park

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

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

Very truly yours,

SOUTHERN ENVIRONMENTAL
SCIENCES, INC.



Darrel J. Graziani, PE
Permitting Manager

DJG/dg

Southern Environmental Sciences, Inc.

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

October 15, 2004

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

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

Re: 40 CFR Part 63, Subpart A – Initial Notifications
Hydro Spa 45th Street Facility
ARMS ID No.: 1030508



Dear Ms. Phillips and Mr. Neeley:

On behalf of Hydro Spa, I am providing the Initial Notification for the facility in accordance with the requirements of 40 CFR 63.9. Please be advised that the facility will be submitting an application for a state air construction permit to the FDEP's Southwest District Office within the next several days. This notification is part of the package being to the District Office. Three (3) copies of the DEP Form 62-210.900(1) have been provided to the District Office and one copy to Pinellas County should you need a copy.

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

- Physical Address: 6101 North 45th Street, Pinellas Park, Florida 33709 – Pinellas County.
- Standard: 40 CFR Part 60, Subpart WWWW – National Emissions Standards for Hazardous Air pollutants: Reinforced Plastic Composites Production. The facility is a new source commencing construction after August 2, 2001. Based on the effective date (April 23, 2003) the source is required to in compliance with the applicable standards upon startup.
- Description: The facility is engaged in the manufacture of Spa Pools using the Open Mold process. The facility has elected to cap emissions of total hazardous air pollutants (HAPS) at 98 tons per year through a federally-enforceable permit restriction. Emissions will be controlled in accordance with the requirements of Table 3 and 4 through the use of low HAP content resins (<38.4%), the use of both mechanical (non-atomized) and manual application techniques, and use of non-HAP containing solvents for cleanup activities. The primary source of emissions is the resin application process. Miscellaneous activities include storage and mix tanks, spray foam application, cleanup activities, use of piping primers/glues, wood working activities and the use of water-based stains (Surface Coating). The operation has been assigned Emissions Unit ID No.: 001.
- The facility is a major source under the HAP and Title V Programs based on HAP emissions (Styrene > 10 & 25 TPY) and a minor source under the PSD Program based on VOC emissions (<250 TPY).

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

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

Very truly yours,

SOUTHERN ENVIRONMENTAL
SCIENCES, INC.



Darrel J. Graziani, PE
Permitting Manager

DJG/dg

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October 15, 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 45th Street Facility
ARMS ID No.: 1030508
October 14, 2004 Request for Additional Information (RAI) Letter

Dear Mr. Noor:

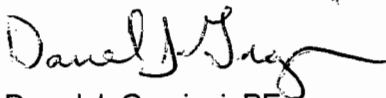
In response to the RAI, enclosed please find four (4) copies of the following:

- The revised 40 CFR Part 63, Subpart A Notification removing the word "Ocala" from the description of the facility.
- A revised Page 1 identifying the Site Name as the "Hydro Spa 45TH Street Facility" which is consistent throughout the application.
- A revised Page 3 that reflects changing the "A" to a "B".
- A new signed and sealed Page 5 as requested.
- Revised pages 9, 22 and 24 reflecting a requested cap of 245 tons per year of VOC emissions.
- A revised Page 15 reflecting a process throughput rate of 2,470 tons-resin per year based on the current HAP content.
- Revised pages 25 through 30 reflecting the corrected page number.

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
G. Robbins, Pinellas County

DJG/dg