Florida Department of Environmental Protection

Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

E-CORRESPONDENCE
narayana@machoproducts.com

NOTICE OF FINAL TITLE V AIR OPERATION PERMIT

In the Matter of an
Application for Permit Renewal by:

Narayana Hathaway,
Vice President and Environmental Coordinator
Macho Products, Incorporated
10045 102nd Terrace
Sebastian, FL 32958

FINAL Permit Project No.: 0610064-004-AV
Macho Products Sebastian Facility

Dear Mr. Hathaway:

Enclosed is FINAL Permit, No. 0610064-004-AV. The purpose is for the renewal of the Title V Air Operation Permit. The facility is located in Indian River County. This permit renewal is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received from Region 4, U.S. EPA, regarding the PROPOSED Permit.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

James N. Bradner, P.E.
Program Administrator
Air Resources Management

JNB/jar

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT (including the FINAL Determination and the FINAL Permit) was sent by certified mail or electronically (with Received Receipt) before the close of business on 5/29/07 to the person(s) listed or as otherwise noted:

Narayana Hathaway, Vice President and Environmental Coordinator, **(narayana@machoproducts.com)**
Macho Products, Incorporated
10045 102nd Terrace
Sebastian, FL 32958

The undersigned duly designated deputy agency clerk hereby certifies that a copy of this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT was sent by certified mail or electronically (with Received Receipt) before the close of business on 5/29/07 to the person(s) listed or as otherwise noted:

David A. Buff, P.E., Golder Associates, Inc., **(dbuff@golder.com)**
Barbara Friday, BAR **[Barbara.Friday@dep.state.fl.us]** (for posting with Region 4, U.S. EPA)

Clerk Stamp

Filed, on this date, pursuant to Section 120.52, F.S., with the designated Department Clerk, receipt is hereby acknowledged.

(Clerk) (Date) 5/29/07

FINAL DETERMINATION

Title V Air Operation Permit Renewal
FINAL Permit No.: 0610064-004-AV
Macho Products, Incorporated
Macho Products Sebastian Facility

I. Comment(s).

No comments were received from the USEPA during their 45-day review period of the PROPOSED Permit.

II. Conclusion.

In conclusion, the permitting authority hereby issues the FINAL Permit.

STATEMENT OF BASIS

Macho Products, Incorporated
Macho Products Sebastian Facility
Facility ID No.: 0610064
Indian River County

Title V Air Operation Permit Renewal
FINAL Permit Project No.: 0610064-004-AV

The Title V Air Operation Permit Renewal 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 subject of this permit is for the renewal of Title V Air Operation Permit. This facility consists of a protective equipment manufacturing process, which includes cutting of foam sheets, gluing, dipping, painting, drying, curing, and silk screening. When dipping takes place, a catalytic incinerator fired by propane, which provides a VOC/HAP reduction efficiency of approximately 95 percent, controls VOC/HAP emissions. The catalytic incinerator is subject to a Compliance Assurance Monitoring (CAM) Plan, which is identified as Appendix CAM and attached to this permit. Monitoring is the continuous measurement of catalyst outlet gas temperature continuously recorded on a strip chart recorder. The minimum outlet gas temperature is 600 degrees Fahrenheit. When operating in the gluing-only mode the incinerator is bypassed. Unregulated fugitive emissions are generated from solvent storage, cooling tower, diluting spray, cutters, and maintenance.

The facility is subject to these emission limitations, with record keeping as the compliance method:
1) Visible emissions from the catalytic incinerator must comply with Rule 62-296.401(1)(a), F.A.C., no visible emissions (5 percent opacity) except that visible emissions not exceeding 20 percent opacity are allowed for up to three minutes in any one-hour period.
2) Volatile Organic Compound (VOC) shall not exceed 21.0 lbs./hour and 52 tons per consecutive twelve months. [Construction permit AC31-225067]. [Permitting note: The hourly limit is used for the day of compliance testing to establish the maximum operating rate.]
3) Hazardous air pollutants (HAP) emissions shall not exceed 21.0 lbs./hour and 52 tons per consecutive twelve months. [Construction permit AC31-225067]. [Permitting note: The hourly limit is used for the day of compliance testing to establish the maximum operating rate.]
4) The maximum operation rates of toluene and/or MEK (Methyl Ethyl Ketone) shall not exceed 388 lbs./hour when dip coating and shall not exceed 20.9 lbs./hour when gluing only. [Permitting note: The hourly limit is used for the day of compliance testing to establish the maximum operating rate.]

A previous permit revision incorporated the terms of Alternate Procedures and Requirements Order #03-L-AP dated October 28, 2003 regarding stack test platform and to change Appendix CAM Page 4, item III. B. 1) from 35 amps to a minimum of 20 amps.

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

Based on the Title V Air Operation Permit Renewal application received December 28, 2006, this facility is a major source of hazardous air pollutants (HAPs).

Macho Products, Incorporated
Macho Products Sebastian Facility
Facility ID No.: 0610064
Indian River County

Title V Air Operation Permit Renewal

FINAL Permit No.: 0610064-004-AV

Permitting Authority:
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803
Telephone: 407/894-7555
Fax: 407/897-5963

Title V Air Operation Permit Renewal

FINAL Permit No.: 0610064-004-AV

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Florida Department of Environmental Protection

Central District Office
3319 Maguire Boulevard, Suite 232
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Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Permittee:
Macho Products, Incorporated
10045 102nd Terrace
Sebastian, FL 32958
Attention: Narayana Hathaway, Vice President
& Environmental Coordinator

FINAL Permit No.: 0610064-004-AV
Facility ID No.: 0610064
SIC Nos.: 30, 3089
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit. This existing facility is located at 10045 102nd Terrace, Sebastian, Indian River County; UTM Coordinates: Zone 17, 545.0 km East and 3072.5 km North; Latitude: 27° 46' 30" North and Longitude: 80° 32' 00" West.

STATEMENT OF BASIS: This Title V Air Operation Permit Renewal 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 CAM, Compliance Assurance Monitoring Requirements
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix SS-1, Stack Sampling Facilities
Appendix TV-6, Title V Conditions (06/23/06)
Table 297.310-1, Calibration Schedule

Effective Date: May 17, 2007
Renewal Application Due Date: January 30, 2012
Expiration Date: July 30, 2012

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

James N. Bradner, P.E.
Program Administrator
Air Resources Management

JNB/jar

Section I. Facility Information.

Subsection A. Facility Description.

The facility consists of a protective equipment manufacturing process which includes cutting of foam sheets, gluing, dipping, painting, drying, curing, and silk screening. When dipping takes place, VOC/HAP emissions are controlled by a catalytic oxidizer fired by propane which provides a VOC/HAP reduction efficiency of approximately 95 percent. The catalytic oxidizer is subject to a Compliance Assurance Monitoring (CAM) Plan, which is identified as Appendix CAM and attached to this permit. Monitoring is the continuous measurement of catalyst outlet gas temperature continuously recorded on a strip chart recorder. The minimum outlet gas temperature is 600 degrees Fahrenheit

When operating in the glue-only mode, the oxidizer is bypassed. Unregulated fugitive emissions are generated from solvent storage, cooling tower, diluting spray, cutters, and maintenance.

Also included in this permit are miscellaneous insignificant emission units and/or activities (see Appendix I-1).

Based on the Title V Air Operation Permit Renewal application received December 28, 2006, this facility is a major source of hazardous air pollutants (HAPS).

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

E.U. ID No.	Brief Description
001	Protective Equipment Manufacturing Process

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, however, 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

These documents are on file with permitting authority:
Initial Title V Air Operation Permit issued July 16, 1997.
Application for a Title V Air Operation Permit Renewal received January 16, 2002.
Macho Products requested revisions to draft permit dated May 16, 2002.
EPA questions on draft permit dated May 24, 2002.
Macho Products requested revisions to Title V permit dated April 21, 2003 and June 11, 2003.
Title V Air Operation Permit Revision issued April 28, 2004

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.

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.
[Rule 62-296.320(2), 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:

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. 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.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. To comply, procedures to minimize pollutant emissions shall include the following:
a. Tightly cover or close all VOC containers when they are not in use;
b. Tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use;
c. Maintain all piping, valves, fittings, etc. in good operating condition;
d. Prevent excessive air turbulence across exposed VOCs; and
e. Immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.
[Rule 62-296.320(1)(a), F.A.C.]

7. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3., & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57 of APPENDIX TV-6, TITLE V CONDITIONS): Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Application of asphalt, water, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities;

b. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne;

c. Landscaping or planting of vegetation; and,

d. Other techniques, as necessary.

[Rule 62-296.320(4)(c)2., F.A.C.]

8. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

9. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) 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-6, TITLE V CONDITIONS)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Central District office.

Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803
Telephone: 407/894-7555; Fax: 407/897-5963

11. 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 & Toxics 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

{Permitting Note: This condition implements the requirements of Rule 62-210.370(3), F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS)}

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications 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.]

13. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to this office four copies of the air permit application, DEP Form No. 62-210.900(1).
[Rule 62-4.090, F.A.C.]

14. Annual Operating Report. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year on or before March 1 of the following year and submitted to the Department of Environmental Protection's Central District office:

Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803
Telephone: 407/894-7555

[Rules 62-210.370(3)(a)1. and (3)(c), F.A.C.]
{Permitting Note: This condition implements the requirements of Rules 62-210.370(3) F.A.C. (see Condition 24. of APPENDIX TV-6, TITLE V CONDITIONS.)}

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
001	Protective Equipment Manufacturing Process

A protective equipment manufacturing process which includes cutting of foam sheets, gluing, dipping, painting, drying, curing, and silk screening. When dipping takes place, VOC/HAP emissions are controlled by a catalytic oxidizer fired by propane, which provides a VOC/HAP reduction efficiency of approximately 95 percent. When operating in the glue-only mode the oxidizer is bypassed.

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

Essential Potential to Emit (PTE) Parameters

A1. Capacity. The utilization rates of toluene and/or MEK (methyl ethyl ketone) shall not exceed 1453 tons per consecutive twelve months when dip coating and shall not exceed 52 tons per consecutive twelve months when gluing only.
[Rule 62-4.160(6), F.A.C. and Rule 62-210.200, (Potential to Emit), F.A.C.]

A2. Hours of Operation. The hours of operation for this emissions unit shall not exceed 7488 hours per consecutive twelve months.
[Rules 62-4.160(2) and 62-210.200, (Potential to Emit), F.A.C.]

A3. Methods of Operation. The catalytic oxidizer shall be fired by propane or natural gas only.
[Rule 62-4.160(2), F.A.C. and 62-210.200, (Potential to Emit), F.A.C.,]

A4. Emissions Unit Operating Rate Limitation After Testing. See specific condition **A13.**
[Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

A5. Visible Emission Limitation. See Facility Wide Condition 3.
[Rule 62-296.320(2), F.A.C.]

A6. Volatile organic compound (VOC) and hazardous air pollutants (HAPs) shall not exceed 52 tons per consecutive twelve months.
[Construction permit AC31-225067 and Rule 62-210.200, (Potential to Emit), F.A.C.]

A7. Volatile organic compound (VOC) and hazardous air pollutants (HAPs) emissions shall not exceed 21.0 lbs./hour during the compliance test.
[Construction permit AC31-225067 and Rule 62-210.200, (Potential to Emit), F.A.C.]

Test Methods and Procedures

A8. The catalytic oxidizer stack must be compliance tested for visible emissions in accordance with DEP Method 9 [Rule 62-297.401(9)(c), F.A.C.] prior to permit expiration date. [Rule 62-297.310(7)(a)4.a., F.A.C.] The test shall be conducted for one hour while the oxidizer is operating.
[Rule 62-297.310(4)(a)2., F.A.C.]

A9. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1) EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

2) EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g. 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g. 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.
[Rule 62-297.401, F.A.C.]

A10. The catalytic oxidizer stack shall be simultaneously stack tested in accordance with DEP Method 9 for one hour and EPA Method 25a at least 180 days prior to permit expiration date [Rules 62-297.310(7)(a)3. and 62-297.401(25)(a), F.A.C.]. The converter destruction efficiency that will achieve the 21 pounds per hour emission limit shall be determined by using EPA Method 24 to determine the VOC application rate and EPA Method 25a to determine the emission rate.

A11. Pursuant to Alternate Procedures and Requirements Order #03-L-AP dated October 28, 2003, the following conditions apply to the existing stack sampling facility.

a. Petitioner may continue to use its current stack sampling facilities in lieu of modification to conform to the requirements of Rule 62-297.310(6), F.A.C.
b. In the event the stack sampling facilities are replaced prior to the expiration of this order, petitioner shall ensure that the new facilities comply with the requirements of Rule 62-297.310(6), F.A.C.
c. This order shall expire on October 17, 2013.
[Rule 62-297.620, F.A.C.]

A12. The owner or operator shall notify the air compliance section of this office, at least 15 days prior to the date on which each formal compliance test is due to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
[Rule 62-297.310(7)(a)9., F.A.C.]

A13. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. The maximum operation rates of toluene and/or MEK (methyl ethyl ketone) shall not exceed 388 lbs/hour when dip coating and shall not exceed 20.9 lbs./hour when gluing only. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rules 62-4.160(2), 62-210.200, F.A.C., (Potential to Emit), and 62-297.310(2) & (2)(b), F.A.C.]

Recordkeeping and Reporting Requirements

A14. In order to demonstrate compliance with condition number **A1.**, **A2.**, and **A6.**, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log at a minimum shall contain the following:

Monthly

a) designation of month and year of operation for which records are being tabulated
b) hours of operation
c) consecutive 12 month total of toluene and MEK (methyl ethyl ketone) usage rates
d) consecutive 12 month total of VOC and HAP emissions
[Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C.]

Note: A consecutive 12 month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 month totals using whatever number of months of data are available until such a time as a consecutive 12 month total can be maintained each month.
[Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C.]

A15. Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least 5 years and made available to the Department. The monthly logs shall be completed by the end of the following month.
[Appendix TV-6, Condition No. 42., and Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C]

A16. The catalytic oxidizer control device for this emission unit is subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emission limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[40 CFR 64; and Rules 62-204.800, 62-213.440(1)(b)1.a., and 62-213.440(4)(b)4., F.A.C.]

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

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
LAT:	Latitude
LONG:	Longitude
MMBtu:	million British thermal units
MW:	Megawatt
ORIS:	Office of Regulatory Information Systems
SOA:	Specific Operating Agreement
UTM:	Universal Transverse Mercator

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.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

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 CAM, Compliance Assurance Monitoring Requirements

The CAM plans that are included in this appendix contain the monitoring requirements necessary to satisfy 40 CFR 64.

40 CFR 64.6 Approval of Monitoring.

1. The attached CAM plan(s), as submitted by the applicant, is/are approved for the purposes of satisfying the requirements of 40 CFR 64.3.
[40 CFR 64.6(a).]

2. The attached monitoring plan(s) include the following information:
(i) The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);
(ii) The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and
(iii) The performance requirements established to satisfy 40 CFR 64.3(b) or (d), as applicable.
[40 CFR 64.6(c)(1)]

3. The attached monitoring plan(s) describe the means by which the owner or operator will define an exceedance of the permitted limits or an excursion from the stated indicator ranges and averaging periods for purposes of responding to (see **CAM Conditions 5. - 9.)** and reporting exceedances or excursions (see **CAM Conditions 10. – 14.**).
[40 CFR 64.6(c)(2)]

4. The permittee is required to conduct the monitoring specified in the attached CAM Plan(s) and shall fulfill the obligations specified in the conditions below (see CAM Conditions 5. - 17.).
[40 CFR 64.6(c)(3)]

40 CFR 64.7 Operation of Approved Monitoring.

5. Commencement of operation. The owner or operator shall conduct the monitoring required under this appendix upon issuance of this Title V permit.
[40 CFR 64.7(a)]

6. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[40 CFR 64.7(b)]

7. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
[40 CFR 64.7(c)]

8. Response to excursions or exceedances.

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR 64.7(d)(1) & (2)]

9. Documentation of need for improved monitoring. If the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7(e)]

40 CFR 64.8 Quality Improvement Plan (QIP) Requirements.

10. Based on the results of a determination made under **CAM Condition 8.b.,** above, the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with **CAM Condition 4.**, an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, may require the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

[40 CFR 64.8(a)]

11. Elements of a QIP:

a. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

b. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

(i) Improved preventive maintenance practices.

(ii) Process operation changes.

(iii) Appropriate improvements to control methods.

(iv) Other steps appropriate to correct control performance.

(v) More frequent or improved monitoring (only in conjunction with one or more steps under **CAM Condition 11.b(i)** through **(iv)**, above).

[40 CFR 64.8(b)]

12. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

[40 CFR 64.8(c)]

13. Following implementation of a QIP, upon any subsequent determination pursuant to **CAM Condition 8.b.**, the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:
a. Failed to address the cause of the control device performance problems; or
b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
[40 CFR 64.8(d)]

14. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
[40 CFR 64.8(e)]

40 CFR 64.9 Reporting And Recordkeeping Requirements.

15. General reporting requirements.
a. Commencing from the effective date of the permit, the owner or operator shall submit monitoring reports semiannually to the permitting authority in accordance with Rule 62-213.440(1)(b)3.a., F.A.C.
b. A report for monitoring under this part shall include, at a minimum, the information required under Rule 62-297.310(8), F.A.C. and the following information, as applicable:
(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
(iii) A description of the actions taken to implement a QIP during the reporting period as specified in **CAM Conditions 10.** Through **14.** Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.
[40 CFR 64.9(a)]

16. General recordkeeping requirements.
a. The owner or operator shall comply with the recordkeeping requirements specified in Rule 62-213.440(1)(b)2.,F.A.C. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to **CAM Conditions 10.** through **14.** and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

40 CFR 64.10 Savings Provisions.

17. It should be noted that nothing in this appendix shall:
a. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under this Title V permit. The requirements of this appendix shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under Title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.
b. Restrict or abrogate the authority of the Administrator or the permitting authority to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.

c. Restrict or abrogate the authority of the Administrator or permitting authority to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.
[40 CFR 64.10]

COMPLIANCE ASSURANCE MONITORING PLAN

Emissions Unit 001 - Protective Equipment Manufacturing Process
VOC/HAP Emissions Controlled By A Catalytic Oxidizer

	INDICATOR NO. 1	INDICATOR NO. 2
I. Indicator	Catalyst inlet gas temperature	Catalyst outlet gas temperature
Measurement Approach	Catalyst inlet gas temperature is monitored with a thermocouple	Catalyst outlet gas temperature is monitored with a thermocouple
II. Indicator Range	An excursion is defined as a temperature reading less than 600°F, excluding periods of startup, shutdown and malfunction; excursions trigger an inspection and corrective action.	An excursion is defined as a temperature reading that is not equal to or greater than the catalyst inlet gas temperature, excluding periods of startup, shutdown and malfunction; excursions trigger an inspection and corrective action.
III. Performance Criteria A. Data Representativeness	The sensor is located at the inlet of the catalyst bed. The expected minimum tolerance of the thermocouple is ±5°F. The minimum chart recorder sensitivity (minor division) is 20°F.	The sensor is located at the outlet of the catalyst bed. The expected minimum tolerance of the thermocouple is ±5°F. The minimum chart recorder sensitivity (minor division) is 20°F.
B. Verification of Operational Status	1) Permanent total enclosure is verified by exhaust fan running at a minimum of 20 amps and recorded on data logger and downloaded monthly in graphic form 2) When dipping, oxidizer operational status is verified at least once per day by a minimum temperature increase of 150 degrees Fahrenheit and temperature is recorded as a strip chart record	Not Applicable
C. Quality Assurance and Control Practices and Criteria	Accuracy of the temperature monitors will be verified on an annual basis for the first two years. If the variation between the first two years is minimal, accuracy verification will occur every two years thereafter.	Accuracy of the temperature monitors will be verified on an annual basis for the first two years. If the variation between the first two years is minimal, accuracy verification will occur every two years thereafter.
D. 1. Monitoring Frequency	Measured Continuously.	Measured Continuously.
2. Data Collection Procedures	Recorded continuously on a strip chart recorder	Recorded continuously on a strip chart recorder
3. Averaging Period	No average is taken	No average is taken

Appendix H-1, Permit History/ID Number Changes

Macho Products, Incorporated
Macho Products Sebastian Facility

FINAL Permit No.: 0610064-004-AV
Facility ID No.: 0610064

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Project Type
001	Protective Equipment Manufacturing Process	0610064-003-AV	4/28/04	7/16/07	Revision
001	Protective Equipment Manufacturing Process	0610064-002-AV	3/3/03	7/16/07	Renewal
001	Protective Equipment Manufacturing Process	0610064-001-AV	7/16/97	7/16/02	Initial

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

Macho Products, Incorporated **FINAL Permit No.: 0610064-004-AV**
Macho Products Sebastian Facility **Facility ID No.: 0610064**

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. Toluene/Methyl Ethyl Ketone Storage Tank
2. Cooling Tower
3. Diluting Spray
4. Hot Wire Cutter
5. Strap Cutter
6. HF Air Conditioner Cleaner/Plant Maintenance
7. Glue Drums
8. EVA Injection Molding
9. Laminating Operations
10. Finishing Line
11. Dark Room
12. Two (2) Propane Boilers (1.1 MMBtu/hr)
13. Research and Development (Thermoform) Oven
14. Dicumyl Peroxide blowing agent from EVA Injection Molding
15. Silicone Spray from EVA Injection Molding

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 3/2/99)

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 arrestors 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 297.310-1 CALIBRATION SCHEDULE
(version dated 3/2/99)

[Note: This tale 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 Max. deviation between readings	Micrometer	+/-0.001" men of at least three readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually	Spirometer or calibrated wet test or dry gas test meter	2%
	3. Check after each test series	Comparison check	5%