

Section I. Facility Information.

Subsection A. Facility Description.

The facility consists of a marble resin tub and vanity manufacturing operation. The processes to manufacture tubs, shower pans, panels, and vanity tops include:

- 1) Molds are cleaned with a mold stripper and mold release is applied. Molds are placed in a spray booth where low HAP gel-coat or Granicoat is sprayed. The mold is moved on to the dry line where the coating cures.
- 2) Molds coated in cured gel-coat or Granicoat are moved to the pouring line where a resin matrix is poured into the molds and cured.
- 3) Molded products go through a finishing process that includes grinding, sanding, and buffing. Particulate emissions are controlled by two Torit Environmental Control Booth Dust Collectors.

Based on the initial Title V permit application received May 12, 2005, 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 Marble Resin Tub and Vanity Manufacturing Facility – The process of manufacturing tubs, shower pans, panels, and vanity tops boats includes several separate operations as described above.

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

These documents are on file with the permitting authority:

Air construction permit 0830153-001-AC, issued December 2, 2003

Air operation permit 0830153-002-AO, issued April 2, 2004

Application for Air Construction Permit and initial Title V Operation Permit received May 12, 2004

Application for renewal Title V Operation Permit received May 11, 2009

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

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 not 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, Maryland 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.
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. and Construction Permit 1270166-003-AC]

7. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)©1., 3.&4., F.A.C., reasonable precautions to prevent unconfined emissions of unconfined particulate matter at this facility include the following requirements:

- a) Chemical or water application to unpaved roads and unpaved yard areas;
- b) Paving and maintenance of roads, parking areas and yards;
- c) Landscaping or planting of vegetation;
- d) Use of hoods, fans, filters, and similar equipment;
- e) Confining abrasive blasting where possible;
- f) Enclosure or covering of conveyor systems; and
- g) Other techniques, as necessary.

[Rule 62-296.320(4)(c)2., F.A.C. and Construction Permit 0830153-003-AC]

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. Annual Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., 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 following office:

Florida Department of Environmental Protection
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803
Telephone: 407/893-3334; 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 & EPCRA Enforcement Branch, Air Compliance Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155; Fax: 404/562-9163

12. Certification of 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. Annual Operating Report. The owner or operator shall complete DEP Form No. 62-210.900(5), F.A.C., "Annual Operating Report for Air Pollutant Emitting Facility," for each calendar year and submit it either electronically using the latest Department Annual Operating Report software or by hard copy to the air compliance section of this office **by April 1** of the following year in accordance with Rule 62-210.370(3), F.A.C. The emissions shall be computed in accordance with the provisions of Rule 62-210.370(2), F.A.C., for the purposes of the annual operating report.

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

14. Within 60 days following the end of each 6 month period after startup submit a semi-annual compliance report.

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

15. At least 225 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(1), 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 Marble Resin Tub and Vanity Manufacturing Facility

The facility consists of a marble resin tub and vanity manufacturing operation. The processes to manufacture tubs, shower pans, panels, and vanity tops include:

- 1) Molds are cleaned with a mold stripper and mold release is applied. Molds are placed in a spray booth where low HAP gel-coat or Granicoat is sprayed. The mold is moved on to the dry line where the coating cures.
- 2) Molds coated in cured gel-coat or Granicoat are moved to the pouring line where a resin matrix is poured into the molds and cured.
- 3) Molded products go through a finishing process that includes grinding, sanding, and buffing. Particulate emissions are controlled by two Torit Environmental Control Booth Dust Collectors.

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

Essential Potential to Emit (PTE) Parameters

A1. Hours of Operation. The emissions unit is permitted to operate continuously.
[Rule 62-210.200, (PTE), F.A.C., Permit 0830153-003-AC].

A2. Material Usage. The maximum permitted material usage rates are 83.2 tons of gel-coat applied per consecutive 12 months and 4,380 tons of resin matrix per consecutive 12 months.
[Rule 62-210.200, (PTE), F.A.C., Permit 0830153-003-AC].

Emission Limitations and Standards

A3. The maximum permitted emissions for total VOCs shall not exceed 50.0 tons per consecutive 12-month period; the maximum permitted emissions for total HAPs shall not exceed 50.0 tons per consecutive 12-month period, and the maximum permitted emissions for any single HAP shall not exceed 50.0 tons per consecutive 12-month period, all VOC and HAP emissions updated monthly
[Rules 62-210.200, (PTE) and 62-4.050(4)(a)2.c., F.A.C., Permit 0830153-003-AC].

Recordkeeping and Reporting Requirements

A4. In order to demonstrate compliance with conditions A2 and A3, the permittee shall maintain a monthly log at the facility. The log shall be completed by the end of the following month and retained on file at the facility for at least five years.

The log, at a minimum shall contain the following:

- a) Designation of the month and year of operation for which the records are being tabulated; and
- b) Consecutive 12 month totals of total VOC, combined HAPs, and individual HAP emission rates. VOC/HAP emission rates are calculated using the table "Unified Emission Factors for Open Molding of Composites", dated July 23, 2001.
- c) Consecutive 12 month totals of gel-coat and other VOC/HAP containing material usage.

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.

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

A5. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (the amount used minus the amount collected for disposal or recycle). Supporting documentation (chemical usage tracking logs, MSD sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) and including references to the HAP/VOC emission factors used, 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.

Volatile matter content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coatings, and inks, using EPA Reference Method 24 and 24A, or the Department shall accept a certification by the coating manufacturer of the composition of the coating if it is supported by standard formulation records for catalog paints or actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings". The documents shall be kept at the facility for at least five years and made available to the Department.

[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

A6. Within 60 days following the end of each 6-month period after startup, submit a semi-annual compliance report.

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

A7. Each particulate emission source must be compliance tested for visible emissions in accordance with DEP Method 9 at least 225 days prior to the permit expiration date. The test shall be conducted for thirty minutes or the length of the batch/cycle.

[Rules 62-297.401(9)(c), and 62-297.310(4)(a)2., F.A.C.]

A8. The provisions of EPA Method 9 (40CFR), Appendix A) are adopted by reference with the following exceptions:

- a. 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.

b. 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:

- 1) 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.
- 2) 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(9)(c), F.A.C.]

A9. At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the air compliance section of this office. The notification must include the following information: the date, time and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test.

[Rule 62-297.310(7)(a)9, F.A.C.]

A10. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. 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.

[Rule 62-297.310(2), F.A.C.].

40 CFR 63, Subparts A and WWWW

A11. The emissions unit(s) in this subsection are subject to the applicable requirements contained in 40 C.F.R. 63, Subparts A and WWWW, which are incorporated by reference and attached to this permit. The company will maintain records to show compliance with Subpart WWWW.