Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

August 18, 2005

E-CORRESPONDENCE
Susita-Linda@yahoo.com (for Olga Romay, President)

Olga Romay, President
Fiber Unlimited
7526 Narcoossee Road
Orlando, Florida 32822

Re: **PROPOSED** Title V Air Operation Permit No.: 0950278-006-AV
Narcoossee Road Facility

Dear Ms. Romay:

One copy of the "PROPOSED PERMIT DETERMINATION" for the operation of the facility at 7526 Narcoossee Road, Orlando, Orange County, is enclosed.

An electronic version of this determination 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/tv/TitleVSearch.asp.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn. If you have any other questions, please contact Alan Zahm, (407)893-3335.

Sincerely,

L.T. Kozlov, P.E.
Program Administrator
Air Resources Management

LTK/azt
Enclosures

Copy furnished to:
Douglas Bauman, P.E., General Environmental, (doug4ucf@earthlink.net)
Roger Caldwell, P.E., Bottorf Associates, Inc., (roger@bottorf.com)
Al Linero, DARM, BAR, Title V Section
Hamp Pridgen, OCEPD, (HAMP.PRIDGEN@OCFL.NET)
U.S. EPA Region IV, (INTERNET E-MAIL MEMORANDUM)

Department of Environmental Protection

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Secretary

Permittee:
Fiber Unlimited
7526 Narcoossee Road
Orlando, Florida 32822

PROPOSED Permit No.: 0950278-006-AV
Facility ID No.: 0950278
SIC Nos.: 30, 3089
Project: Title V Air Operation Permit Revision

The purpose of this permit is to renew the Title V Operation Permit. This existing facility is located at 7526 Narcoossee Road, Orlando, Orange County; UTM Coordinates: Zone 17, 473.35 km East and 3147.85 km North; Latitude: 28° 27' 31" North and Longitude: 81° 16' 20" West.

STATEMENT OF BASIS: This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. 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 TV-5, TITLE V CONDITIONS (version dated 03/28/05)
APPENDIX SS-1, STACK SAMPLING FACILITIES version dated 3/2/99
TABLE 297.310-1, CALIBRATION SCHEDULE version dated 3/2/99
Appendix H-1, Permit History/I.D. Number Changes
Appendix Subpart WWWW
Appendix General Provisions Revision

Revision Effective Date: **TBD**
Revision Application Due Date: **March 30, 2006**
Expiration Date: **September 30, 2006**

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

L. T. Kozlov, P.E.
Program Administrator
Air Resources Management

LTK/azt

cc: Douglas Bauman, P.E., General Environmental, (doug4ucf@earthlink.net)
Roger Caldwell, P.E., Bottorf Associates, Inc., (roger@bottorf.com)
Al Linero, DARM, BAR, Title V Section
Hamp Pridgen, OCEPD, (HAMP.PRIDGEN@OCFL.NET)
U.S. EPA Region IV, (INTERNET E-MAIL MEMORANDUM)

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 0950278-006-AV Page 1 of 1

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION" to Fiber Unlimited Fiberglass Parts and Products Manufacturing Facility located at 7526 Narcoossee Road, Orlando, Orange County was clerked on May 16, 2005. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION" was published in the ***Orlando Sentinel*** on July 19, 2005. The DRAFT Title V Air Operation Permit was available for public inspection at the permitting authority's office in Orlando. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION" was received on July 29, 2005.

II. Public Comment(s).

No comments were received during the 30 (thirty) day public comment period. Since no comments were received, the DRAFT Title V Air Operation Permit becomes the PROPOSED Title V Air Operation Permit.

III. Conclusion.

Since there were no comments received during the Public Notice period, no changes were made to the DRAFT Permit and the permitting authority hereby issues the PROPOSED Permit No.: 0950278-006-AV.

STATEMENT OF BASIS

Fiber Unlimited
Narcoossee Road Facility
Facility ID No.: 0950278
Orange County

Proposed Title V Air Operation Permit No.: 0950278-006-AV

The renewal Title V Air Operation Permit, No. 0950278-003-AV, was issued on March 15, 2002. This Title V Air Operation Permit Revision 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 to incorporate the terms and conditions of permit 0950278-005-AC, raising the emission limits of VOC and HAP's.

This facility consists of a fiberglass parts and products manufacturing process which makes small boat parts that are used at other boat manufacturing facilities and fiberglass animals, trees and rocks, etc., used at Disney World. The process includes two spray lay up rooms for the application of gel coat, fiberglass, and polyester resin to molds. These sources are equipped with dry filter pads that provide a particulate reduction efficiency of approximately 98 percent. The process also includes two product grinding areas equipped with a baghouse separator that provides a particulate reduction efficiency of approximately 98 percent.

The applicable emission limitations are as follows:

E.U. 001 and E.U. 002 – general VE limit per Rule 62-296.320(4)(b)1., F.A.C.; general VOC standard per Rule 62-296.320(1)(a), F.A.C.; annual VOC limit per construction permit 0950278-005-AC of 50.0 tons per consecutive 12 months and annual hazardous air pollutants (HAPs) limit of 50.0 tons per consecutive 12 months.

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

Based on the initial Title V Operation Permit application received June 13, 1996, and the Title V Operation Permit Renewal application, this facility is a major source of HAPs.

Fiber Unlimited
Narcoossee Road Facility
Facility ID No.: 0950278
Orange County

Title V Air Operation Permit Revision
PROPOSED Title V Operation Permit No.: 0950278-006-AV

Permitting Authority:
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803

Telephone: 407/893-3334
Fax: 407/897-5963

Compliance Authority:
Orange County Environmental Protection Division
Air Program
800 Mercy Drive
Suite 4
Orlando, Florida 32808

Telephone: 407/836-1447
Fax: 407/836-1499

Title V Air Operation Permit Revision
PROPOSED Title V Operation Permit No.: 0950278-006-AV

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Section I. Facility Information.

Subsection A. Facility Description.

The facility consists of a fiberglass parts and products manufacturing process, which includes two spray, lay up rooms for the application of gel coat, fiberglass, and polyester resin to molds. These sources are equipped with dry filter pads which provide a particulate reduction efficiency of approximately 98 percent. The process also includes two product grinding areas equipped with a baghouse, which provides a particulate reduction efficiency of approximately 98 percent.

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

Based on the initial Title V permit application received June 13, 1996, 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
005	Two Spray Lay Up Rooms
002	Two Product Grinding Areas

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

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:
Initial Title V Operation Permit Application received June 13, 1996
Additional information request dated August 4, 1997.
Additional information request dated August 26, 1997.
Initial Title V Operation Permit issued December 30, 1997
Application for a Title V Operation Permit Renewal received March 27, 2005
Renewal Title V Operation Permit issued March 15, 2002
Application to Increase Material use, received February 4, 2005

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-5, 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
P.O. Box 1515
Lanham-Seabrook, Maryland 20703-1515
Telephone: 301/429-5018

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. and Permit AC48-207363]

7. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a) Use of high efficiency spray guns; and
b) Maintain filters in good working order.

[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. The permittee shall submit all compliance related notifications and reports required of this permit to the following office:

Orange County Environmental Protection Department
Air Program
800 Mercy Drive
Suite 4
Orlando, Florida 32808
Telephone: 407/836-1447; Fax: 407/836-1499

10. 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, SW
Atlanta, Georgia 30303-3104
Telephone: 404/562-9099; Fax: 404/562-9095

11. 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 Orange County Environmental Protection Division.
[Rule 62-210.370(3), F.A.C.]

12. Annual Statement of Compliance. The permittee shall submit a statement of compliance with all terms and conditions of the permit using DEP Form No. 62-213.900(7), F.A.C. Such statements shall be accompanied by a certification in accordance with Rule 62-213.420(4), F.A.C. Such statements shall be submitted (postmarked) to the Orange County Environmental Protection Division and EPA:

a) Annually, within 60 days after the end of each calendar year during which the Title V permit was effective, or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement; and

b) Within 60 days after submittal of written agreement for transfer of responsibility as required pursuant to 40 CFR 70.7(d)(1)(iv), adopted and incorporated by reference at Rule 62-204.800, F.A.C., or within 60 days after permanent shutdown of a facility permitted under this chapter; provided that, in either such case, the reporting period shall be the portion of the calendar year the permit was effective up to the date of transfer of responsibility or permanent facility shutdown, as appropriate.
[Rule 62-213.440(3)(a)2., F.A.C.]

13. Annual Emissions Fee. Each Title V source permitted to operate in Florida must pay between January 15 and March 1 of each year, upon written notice from the Department, an annual emissions fee in accordance with Rule 62-213.205, F.A.C., and the appropriate form and associated instructions.
[Rules 62-213.205 and 62-213.900(1), F.A.C.]

14. Annual Emissions Fee. Any documentation of actual hours of operation, actual material or heat input, actual production amount, or actual emissions used to calculate the annual emissions fee shall be retained by the owner for a minimum of five (5) years and shall be made available to the Department upon request.
[Rule 62-213.205(1)(j), F.A.C.]

15. Annual Emissions Fee. A completed DEP Form 62-213.900(1), F.A.C., "Major Air Pollution Source Annual Emissions Fee Form", must be submitted by the responsible official with the annual emissions fee.
[Rule 62-213.205(1)(k), F.A.C.]

16. 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(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 Two Spray Lay Up Rooms for the application of gel coat, fiberglass, and polyester resin to molds. These sources are equipped with dry filter pads which provide a particulate reduction efficiency of approximately 98 percent.

002 Two Product Grinding Areas equipped with a baghouse which provides a particulate reduction efficiency of approximately 98 percent.

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

Essential Potential to Emit (PTE) Parameters

A1. Hours of Operation. Each emissions unit is permitted to operate continuously.
[Rule 62-210.200, (PTE), F.A.C., Permit 0950278-005-AC.
A2. Capacity. The permitted materials and maximum utilization rates per consecutive 12 months are as follows:

Material	Emission Factor	Tons
a) Unsaturated Polyester Resin	0.035 lbs styrene emitted/lbs material used	635
b) Gel Coat	0.095 lbs styrene emitted/lbs material used	105

The applicant may use different volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) materials than those stated in the application provided applicable emission limits are not exceeded.
[Rule 62-210.200, (PTE), F.A.C., permits 0950278-005-AC.

Emission Limitations and Standards

A3. The facility's VOC emissions rate is limited to less than 50.0 tons per consecutive 12 months and the facility's HAP emissions rate is limited to less than 50.0 tons per consecutive 12 months. [Permit 0950278-005-AC]

Test Methods and Procedures

A4. Each unit shall demonstrate compliance with its visible emission limit (see facility-wide condition number 3) in accordance with EPA Method 9 prior to permit expiration date. The test prior shall be a minimum of 30 minutes.
[Rules 62-297.401, 62-297.310(4)(a)2., and 62-297.310(7)(a)4.a., F.A.C.]

A5. 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.]

A6. 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 Orange County Environmental Protection Division. 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.]

A7. 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. Hourly operating rates were not provided in the application. 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.].

A8. Reports of the required tests shall be filed with the Orange County Environmental Protection Division as soon as practical but no later than 45 days after the last test is completed.
[Rules 62-297.310(8), F.A.C.]

Monitoring of Operations

A9. Determination of Process Variables.

a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such a belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10 percent of its true value.
[Rule 62-297.310(5), F.A.C.]

Recordkeeping and Reporting Requirements

A10. In order to demonstrate compliance with conditions A2 and A3, the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded. The log, at a minimum, shall contain the following:
Monthly

a) Designation of the month and year of operation for which the records are being tabulated; and
b) Consecutive 12-month total of material usage rates and VOC and HAP emissions rates.

[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 is available until such a time as a consecutive 12-month total can be maintained each month.

A11. Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, 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 five years and made available to the Department. Daily logs shall be completed within seven business days and the monthly logs shall be completed by the end of the following month.
[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

40 CFR 63, Subpart WWWW

A12. The emissions unit(s) in this subsection are subject to the applicable requirements contained in 40 C.F.R. 63, Subpart A, which is incorporated by reference and attached to this permit, Appendix General Provisions.

A13. Beginning April 21, 2006, the facility is subject to the applicable requirements contained in 40 C.F.R. 63, Subpart WWWW, which is incorporated by reference and attached to this permit. The company will maintain records to show compliance with Subpart WWWW. Rule 63.5900 allows four methods to comply:

a) Add-on control device
b) Complying with HAP emission limit in Table 3 or 5
c) Complying with HAP emission limit in Table 7
d) Complying with work practice standards in Table 4

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	Micrometer	+/-0.001" men 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	Spirometer or calibrated wet test or dry gas test meter	2%
	2. One Point: Semiannually		
	3. Check after each test series	Comparison check	5%

Appendix H-1: Permit History

Fiber Unlimited
Narcoossee Road Facility

PROPOSED Title V Operation Permit No.: 0950278-006-AV
Facility ID No.: 0950278

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Project Type
- 001 and - 002	Two Spray Lay Up Rooms Two Product Grinding Areas	0950278-001-AC	09/04/96	07/30/01	Construction Permit
ALL		0950278-002-AV	12/30/97	09/30/01	Initial Title V Permit
ALL		0950278-003-AV	3/15/02	9/30/06	Renewal Title V Permit

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

Fiber Unlimited **PROPOSED Title V Operation Permit No.:** 0950278-006-AV.
Narcoossee Road Facility **Facility I.D. No.:** 0950278

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. Acetone usage.
2. Resin mixing.
3. Gel coat mixing.
4. Resin and gel coat storage.
5. Mold repair.
6. Miscellaneous use of paint.
7. Sink and counter top operation.

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.]

Appendix Subpart WWWW

Updated 6/12/03

Source: Federal Register dated 4/21/03

Subpart WWWW--National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

What This Subpart Covers
63.5780 What is the purpose of this subpart?
63.5785 Am I subject to this subpart?
63.5787 What if I also manufacture fiberglass boats or boat parts?
63.5790 What parts of my plant does this subpart cover?
63.5795 How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?

Calculating Organic HAP Emissions Factors for Open Molding and Centrifugal Casting
63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart and how are they used in this subpart?
63.5797 How do I determine the organic HAP content of my resins and gel coats?
63.5798 What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?
63.5799 How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?

Compliance Dates and Standards
63.5800 When do I have to comply with this subpart?
63.5805 What standards must I meet to comply with this subpart?

Options for Meeting Standards
63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?
63.5820 What are my options for meeting the standards for continuous lamination/casting operations?
63.5830 What are my options for meeting the standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reductions requirement?

General Compliance Requirements
63.5835 What are my general requirements for complying with this subpart?

Testing and Initial Compliance Requirements
63.5840 By what date must I conduct a performance test or other initial compliance demonstration?
63.5845 When must I conduct subsequent performance tests?
63.5850 How do I conduct performance tests, performance evaluations, and design evaluations?
63.5855 What are my monitor installation and operation requirements?
63.5860 How do I demonstrate initial compliance with the standards?

APPENDIX TV-5, TITLE V CONDITIONS (version dated 03/28/05)

[Note: This attachment includes "canned conditions" developed from the "Title V Core List."]

{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.}

Chapter 62-4, F.A.C.

1. **Not federally enforceable.** General Prohibition. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, constructed, expanded, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.
[Rule 62-4.030, Florida Administrative Code (F.A.C.); Section 403.087, Florida Statute (F.S.)]

2. **Not federally enforceable.** Procedures to Obtain Permits and Other Authorizations; Applications.
(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require.
(2) All applications and supporting documents shall be filed in quadruplicate with the Department.
(3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except, when the application is for renewal of an air pollution operation permit at a non-Title V source as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.
(4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C.
(5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section.
(b) When an application is received without the required fee, the Department shall acknowledge receipt of the application and shall immediately notify the applicant that the required fee was not received and advise the applicant of the correct fee. The Department shall take no further action until the correct fee is received. If a fee was received by the Department which is less than the amount required, the Department shall return the fee along with the written notification.
(c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin.
(d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application.
(e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee.
(6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review.
(7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application for the same time duration except for modification under Chapter 62-45, F.A.C.
[Rule 62-4.050, F.A.C.]