STATEMENT OF BASIS

Blue Hawaiian Products, Inc.
Blue Hawaiian Products, Inc. – Largo Facility
Facility ID No.: 1030162
Pinellas County

Title V Air Operation Permit Renewal
Operation Permit No.: 1030162-007-AV
Renewal of Title V Air Operation Permit No.: 1030162-006-AV
Incorporation of Construction Permit No.: 1030162-008-AC

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 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 No. 1030162-006-AV and incorporation of the terms and conditions of Construction Permit 1030162-008-AC.

This facility consists of the application and related activities involved in a reinforced plastic composites production that includes a fiberglass pool manufacturing operation. The pool manufacturing begins with a design from which a mold is fabricated. The convex mold is finished to a smooth surface so the fiberglass pools can be easily removed. The mold, after completion, is moved to the Fiberglass Lamination Building where it is waxed prior to the application of the gel coat. The use of polyester resin/gel coat and gel coat are conducted at the east end of the 285.5-ft. long by 80-ft. wide Fiberglass Lamination Building and are also conducted in the 135-ft. long by 80-ft. wide Mold Lamination Building. The first layer of resin/gel coat is sprayed on with a chopper gun, which also applies the "gun roving" fibers. The second and fourth coats applied consist of the "chopped strand mat" applied with resin/gel coat; while the third and fifth coats of fiberglass consists of the "woven roving fabric" applied with resin/gel coat. Upon curing, the pool is removed from the mold and trimmed prior to storage and/or shipping. The ventilated area of the Fiberglass Lamination Building is substantially enclosed and is 102-ft. long by 80-ft. wide. The entire area (i.e. 135-ft. long by 80-ft. wide) of the Mold Lamination Building is ventilated. OS/VOC emissions from the ventilated area of the Fiberglass Lamination Building are exhausted through two (2) 46-ft. high stacks each with an outlet diameter of 35 inches, a minimum airflow rate of 25,500 ACFM, and a minimum air flow velocity of 63.6 feet per second. OS/VOC emissions from the Mold Lamination Building will are exhausted through two (2) 42-ft. high stacks each with an outlet diameter of 32 inches, a minimum air flow rate of 22,500 ACFM, and a minimum air flow velocity of 63.5 feet per second. Miscellaneous VOC, non-HAP, and non-VOC materials are used primarily for the preparation and repair of molds, touch up, and equipment cleanup.

Compliance with the VOC and HAP emission limitations is demonstrated by monthly recordkeeping.

Documentation of the HAP emission calculation shall be determined by using the emission factors in the Table 1 of 40 CFR Part 63, Subpart WWWW and/or from Unified Emission Factors for Open Molding of Composites Table dated July 23, 2001 (see attached Subpart WWWW and UEF Table). Documentation of VOC emission shall be determined by a mass balance method, or appropriate emission factor. The allowable VOC emissions are 245 tons per any 12 consecutive-month period.

Compliance with the minimum volumetric flow rate and velocity limitation shall be demonstrated using EPA Method 2 on the exhaust stack within 60 days prior to the renewal application due date of this permit and within 60 days after any system modification or installation of any new systems.

CAM does not apply since the pollutant-specific emission unit (PSEU) does not use a control device to meet limit.

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

Based on the Title V permit renewal application received October 16, 2007, this facility is a major source of hazardous air pollutants (HAPs).

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