STATEMENT OF BASIS

CDR Systems Corporation
Palatka Plant
Facility ID No.: 1070031
Putnam County

Title V Air Operation Permit Revision
PROPOSED Permit No.: 1070031-007-AV
Revision to Title V Air Operation Permit No.: 1070031-004-AV

The Title V Air Operation Permit Renewal, No. 1070031-003-AV, was issued/effective on May 6, 2003. 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.

CDR Systems Corporation manufactures Polymer Concrete and Fiberglass Reinforced Plastics polyester utility enclosure using two basic processes with ten variations. There are no physical processing units to which operating rates can be linked. Emissions from the plant are fugitive.

The subject of this permit revision is to incorporate the revised terms and conditions of 40 CFR Part 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, which was promulgated on October 26, 2005. The emissions units that are subject to the regulations must comply with the requirements in Table 2 of Subpart WWWW.

CAM does not apply.

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

Based on the Title V Air Operation Permit Revision application received August 16, 2002, this facility is a major source of hazardous air pollutants (HAPs).