



**AIR OPERATION PERMIT**

May 1, 2012

CERTIFIED MAIL #7011 3500 0001 1168 4688  
RETURN RECEIPT REQUESTED

**PERMITTEE:**

Glaspro, Inc. dBa Zap Skim'ers  
101 Pond Cypress Rd.  
Venice, FL 34292

Air Permit No.s: 1150069-006-AF  
County: Sarasota County  
Expiration Date: May 4, 2017

Authorized Representative:  
Robert Smetts, Owner/ President

Glaspro, Inc. dBa Zap Skim'ers  
Air Operation Permit Project: Fiberglass  
Products Manufacturing Facility

This federally enforceable state air operation permit (permit #1150069-006-AF), authorizes the facility to continue operating an existing and previously permitted fiberglass products manufacturing facility. The facility manufactures fiberglass products including skimboards and vaults (e.g., a box where pumps and associated equipment are placed to operate a water fountain). The manufacturing process consists of four basic steps: (1) spray application of styrene containing gelcoat to prepared molds/ forms [occurs inside of spray booth]; (2) application of styrene containing resin, foam core [as applicable], and reinforcements to gelcoated forms/ molds; (3) trimming/ grinding/ sanding of excess resin/ imperfections from cured laminated parts; and (4) application of decorative logos to skimboards using screen printing. Emissions from the facility are collectively regulated through facility wide emissions limitations. The facility is located at 101 Pond Cypress Rd., Venice, FL 34292.

This permit is organized by the following sections.

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Facility Wide Specific Conditions
- Section 4. Emissions Unit Specific Conditions
- Section 5. Appendices

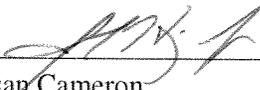
Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Section 5. Appendix A of this permit.

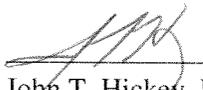
This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and Chapter 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with Sarasota County Parks, Recreation and Natural Resources (SCNR). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Any party to this Order (air permit) has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Office of the County Attorney, 1660 Ringling Boulevard, Sarasota, Florida 34236; 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 thirty (30) days from the date this Order is filed with the Clerk of the Office of the County Attorney.

Executed in Sarasota, Florida.

SARASOTA COUNTY PARKS, RECREATION AND NATURAL RESOURCES  
AIR & WATER QUALITY

  
\_\_\_\_\_  
Susann Cameron  
Environmental Specialist III  
Sarasota County Air & Water Quality

  
\_\_\_\_\_  
John T. Hickey, P.E.  
Manager  
Sarasota County Air & Water Quality

Enclosure

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy clerk hereby certifies that this Final Air Operation Permit was mailed by certified mail before the close of business on **May 14, 2012** to:

Robert Smetts, Owner/ President, Glaspro, Inc. dBa Zap Skim'ers, 101 Pond Cypress Rd.,  
Venice, FL 34292

The undersigned duly designated deputy clerk hereby certifies that this Final Air Operation Permit was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on **May 14, 2012** to the

\_\_\_\_\_  
Glaspro, Inc. dBa Zap Skim'ers  
Fiberglass Products Manufacturing Facility

1150069-006-AF

persons listed below:

Cc: Tom John, P.E., Tom John P.E., Inc., 6250 Cape Hatteras Way #2, St. Petersburg, FL 33702; [tjengr@msn.com](mailto:tjengr@msn.com)

Cindy Zhang-Torres, P.E. III, Air Permitting Supervisor, FDEP SW District, 13051 North Telecom Parkway, Temple Terrace, FL 33637-0926; [Cindy.Zhang-Torres@dep.state.fl.us](mailto:Cindy.Zhang-Torres@dep.state.fl.us)

David M. Pearce, Attorney, Sarasota County Office of the County Attorney; [dpearce@scgov.net](mailto:dpearce@scgov.net)

Melissa L. Wagar, Sarasota County Office of the County Attorney; [mwagar@scgov.net](mailto:mwagar@scgov.net)

Clerk Stamp



**FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated SCNR Clerk, receipt of which is hereby acknowledged.**

*Ala. Perry P. Taylor*      May 14, 2012  
Clerk                                      Date

S12PC.020



## SECTION 1. GENERAL INFORMATION

### PERMITTEE:

Glaspro, Inc. dBa Zap Skim'ers  
101 Pond Cypress Rd.  
Venice, FL 34292

Air Permit No.: 1150069-006-AF  
Effective Date: May 4, 2012  
Expiration Date: May 4, 2017  
Air Operation Permit Project: Fiberglass  
Products Manufacturing Facility

### FACILITY AND PROJECT DESCRIPTION

This federally enforceable state air operation permit (permit #1150069-006-AF), authorizes the facility to continue operating an existing and previously permitted fiberglass products manufacturing facility. The facility manufactures fiberglass products including skimboards and vaults (e.g., a box where pumps and associated equipment are placed to operate a water fountain). The manufacturing process consists of four basic steps: (1) spray application of styrene containing gelcoat to prepared molds/ forms [occurs inside of spray booth]; (2) application of styrene containing resin, foam core [as applicable], and reinforcements to gelcoated forms/ molds; (3) trimming/ grinding/ sanding of excess resin/ imperfections from cured laminated parts; and (4) application of decorative logos to skimboards using screen printing. Emissions from the facility are collectively regulated through facility wide emissions limitations. The facility is located at 101 Pond Cypress Rd., Venice, FL 34292.

The facility is synthetically non-Title V since the permittee has requested volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions limits that are below the Title V permitting thresholds of Chapter 62-213, F.A.C. HAP(s) are defined in Rule 62-210.200(160), F.A.C.

The maximum allowable emissions of total VOCs (includes all HAPs), total HAPs, and individual HAP from the facility are 12.99, 10.41, and 8.72 tons per any consecutive 12 month period, respectively. All emissions of HAPs at this facility are expected to be VOCs. Based on the processes and materials used in the fiberglass products manufacturing individual HAP(s) that may be emitted include, but are not limited to: Styrene, Methyl Methacrylate (MMA), Toluene, and Dimethyl phthalate.

The facility consists of one main building with approximately 20,000 square feet of manufacturing floor space. Housed within the building are the following separate functions involved in the manufacturing process:

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Glaspro, Inc. dBa Zap Skim'ers  
Fiberglass Products Manufacturing Facility

1150069-006-AF

## SECTION 1. GENERAL INFORMATION

### Mold preparation and gelcoat

Skimboard and vault molds are first cleaned [using acetone/ other solvent] and prepared for gelcoating with either a release agent or wax to facilitate removal of the cured part from the mold. The prepared molds are moved to a spray booth where they are sprayed with a gelcoat resin compound consisting primarily of polyester solids and styrene monomers. After spraying the molds, the gelcoat is allowed to cure to a tacky surface. Unconfined particulate matter emissions from the spray booth are controlled by fiber mesh filter pads; the booth exhausts through two (2) 39-foot high stacks at design rates of 15,000 and 25,000 ACFM, respectively.

### Hand lay-up, closed and open molding, and curing of fiberglass area

For the manufacture of skimboards, a prefabricated foam core is wrapped with reinforcement mats and catalyzed polyester resin. The core reinforcing materials and resin are placed in the board molds, which are closed and placed in the mold press for curing. In the manufacture of vaults, fiberglass mats, filler, and catalyzed polyester resin are applied to the gelcoat surface of the vault molds. These open molds are then allowed to cure.

### Trimming and grinding area

Once cured, the parts are removed from the molds and transferred to the trimming and grinding booth where excess material [i.e., flashing] is removed using air driven hand tools. Surface imperfections may be sanded/ ground down and patching resin/ gelcoat reapplied to yield a smooth surface as appropriate. Unconfined particulate matter emissions from the trimming/ grinding booth are controlled by Torit 1X6 Ultra Web ambient filter tubes; the booth exhausts through a 26-foot high stack at a design rate of 20,000 ACFM.

### Screen printing area

Original decorative logos are designed and then applied to the surface of finished products by a screen printing process. These logos provide the decoration for the skimboards.

### Exempt emissions sources

A small distillation unit is used to recover solvents for re-use

Operational design of the facility will ensure that emissions of particulate matter (PM and PM-10), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), VOC (Volatile Organic Compounds), and

**SECTION 1. GENERAL INFORMATION**

HAP(s) (Hazardous Air Pollutant(s)) are below the Title V permitting thresholds of Chapter 62-213, F.A.C. The facility is classified as a Synthetic Minor facility.

**FACILITY REGULATORY CLASSIFICATION**

Subject to:	Y/N
Rule 62-212.300, Stationary Sources – Preconstruction Review, General Preconstruction Review Requirements, F.A.C. <sup>1</sup>	Y
Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. <sup>2</sup>	N
Rule 62-296.320, Stationary Sources – Emission Standards - General Pollutant Emission Limiting Standards, F.A.C. <sup>3,4</sup>	Y
Rule 62-296.500, Reasonably Available Control Technology (RACT) – Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities <sup>5</sup>	N
Rule 62-296.700, Reasonably Available Control Technology (RACT) Particulate Matter <sup>6</sup>	N
Rule 62-204.800(8), Stds. of Performance for New Stationary Sources, F.A.C. <sup>7</sup> (NSPS)	N
Rule 62-204.800(10), Natl. Emission Stds. for Hazardous Air Pollutants, F.A.C. <sup>8</sup> (NESHAPS)	N
Chapter 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C. <sup>9</sup>	N
Rule 62-297.310, Stationary Sources – Emissions Monitoring - General Compliance Test Requirements, F.A.C. <sup>10</sup>	N

1. Not exempt from general permitting requirements
2. Facility is PSD minor source
3. Facility may be a source of unconfined particulate matter emissions
4. Potential source of odors
5. Facility is not located in an ozone nonattainment or air quality maintenance area
6. Facility is not located in a PM air quality maintenance area or in the area of influence of such an area
7. Facility is not subject to 40 CFR Part 60
8. Facility is synthetic minor for HAPs
9. Facility is synthetically limited
10. Compliance testing is not required

**PERTINENT DOCUMENTS:**

- 1150069-001-AC Original State Air Construction Permit;
- 1150069-002-AF Original Federally Enforceable State Air Operation Permit [FESOP];
- 1150069-003-AF Minor Modification to FESOP;
- 1150069-004-AF FESOP Renewal; and,
- 1150069-005-AF FESOP Renewal.

**SECTION 1. GENERAL INFORMATION**

Facility Information Summary:

Location: 101 Pond Cypress Road, Venice, FL 34292

Replaces Permit No.: 1150069-005-AF

UTM: 17-362.92 East 2999.97 North

Latitude: 27° 06' 55.4832"

Longitude: 82° 22' 58.7928"

Facility ID No: 1150069

Emissions Unit (EU) ID No.:

001 - Spray Booth Gelcoat Application

002 - Hand Lay-up, Closed/ Open Molding & Curing

003 - Grinding Booth (Board Grinding/ Trimming)

004 - Screen Printing

**Note:** Please reference Permit No. and Emission Unit (EU) ID No. in all correspondence, test report submittals, applications, etc.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is Sarasota County Parks, Recreation and Natural Resources [SCNR], Air & Water Quality. SCNR's mailing address is: SCNR Air & Water Quality; 1001 Sarasota Center Blvd.; Sarasota, Florida 34240. All documents related to applications for permits shall be submitted in triplicate to SCNR.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to SCNR. The mailing address and phone number are: SCNR Air & Water Quality; 1001 Sarasota Center Blvd.; Sarasota, Florida 34240; (941)861-0675.
3. Appendices: The following Appendices are attached as part of this permit:
  - a. Appendix A. Citation Formats and Glossary of Common Terms;
  - b. Appendix B. General Conditions; and,
  - c. Appendix C. Common Conditions.
4. Applicable Regulations, Forms, and Application Procedures: All applicable rules and design discharge limitations specified in the application shall be adhered to. The facility is subject to all applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297. Issuance of this permit does not relieve the permittee from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Florida Department of Environmental Protection (DEP), SCNR or any other such requirements under Federal, State, or Local law. [Rules 62-210.300 and 62-4.070(7), F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, SCNR may require the permittee to conform to new or additional conditions. SCNR shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, SCNR may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modification: Any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification. Upon modification, an existing facility shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere. No emissions unit or facility shall be constructed or modified without obtaining an air construction permit from SCNR prior to the beginning of construction or modification. [40 CFR 60.14; Rules 62-4.030, 62-4.070(3), 62-4.080(2), 62-210.300(1) and 62-212.300(1), F.A.C.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

7. Rule Compliance: A facility or emissions unit subject to any standard or requirement of 40 CFR. Part 60, 61, 63 or 65, adopted and incorporated by reference at Rule 62-204.800, F.A.C., shall comply with such standard or requirement. [Rule 62-296.100(3), F.A.C.]
  
8. Annual Operating Report: Submit to SCNR Air & Water Quality each calendar year and on or before April 1, an Annual Operating Report for Air Pollutant Emitting Facility [DEP Form 62-210.900(5)] for the preceding calendar year. [Rule 62-210.370(3), F.A.C.]
  
9. Air Operation Permit Renewal: A completed application for an air operation permit shall be submitted to SCNR Air & Water Quality no later than 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the applicant shall submit the following:
  - a. the appropriate permit application form (see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>);
  - b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and,
  - c. a copy of the most recent 12 consecutive months of records as required by Specific Condition No.s 18 and 19.[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2) and 62-210.900, F.A.C.]

### SECTION 3. FACILITY WIDE SPECIFIC CONDITIONS

#### A. Facility Wide

##### Facility wide Performance Restrictions:

This section of the permit addresses the entire facility. Facility wide General Conditions and Common Conditions are located in Appendices B and C, respectively.

10. Operating Hours and Emissions Limits: The facility is permitted to operate 8,760 hours/year. Emissions from the facility are limited to:

- a. 8.72 tons individual HAP (e.g., xylene) per any 12 consecutive month period;
- b. 10.41 tons total HAPs per any 12 consecutive month period; and,
- c. 12.99 tons total VOC per any 12 consecutive month period.

[Rules 62-4.070(3) and 62-210.200(247) PTE, F.A.C.]

11. Circumvention: The permittee shall not circumvent any air pollution control devices or allow the emissions of air pollutants without the air pollution control device operating properly. The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [Rules 62-4.070(3), 62-210.650 and 62-210.700(4), F.A.C.]

12. Volatile Organic Compounds (VOC)/ Organic Solvents Emissions: No person shall store, pump, handle process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emissions control devices or systems deemed necessary and ordered by SCNR. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is defined in Rule 62-210.200(221), F.A.C., Definitions, as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

Such controls include the following:

- a. Spray coatings [e.g., gelcoat/ resin] inside of spray booths;
- b. Tightly cover or close all adhesive/ solvent/ coating containers when they are not in use; tightly cover all adhesive/ solvent/ coating day tanks when not in use;

### SECTION 3. FACILITY WIDE SPECIFIC CONDITIONS

#### A. Facility Wide

- c. Run spray booth exhaust fans for at least 2 hours past use of VOC &/ or solvent containing materials;
- d. Maintain all pipes/ valves/ fittings/ hoses in good operating condition;
- e. Confine rags used with adhesives/ solvents/ coatings to tightly closed, fireproof containers when not in use; and, immediately confine and clean up any spills;
- f. Make sure wastes are placed in closed containers for reuse/ recycling/ proper disposal.

[Rules 62-4.070(3) and 62-296.320(1)and (2), F.A.C.]

13. Unconfined Particulate Matter Emissions Opacity Standard: No person shall cause, let, permit, suffer, or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition, or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Unconfined particulate matter emissions from trimming and other similar activities such as: cutting, shaping, and sanding operations performed by hand tools and tabletop equipment shall, in general, be controlled by conducting such activities inside the grinding booth within the designated grinding and polishing area of the facility. In addition, normal “good housekeeping” procedures and reasonable work practices shall be utilized to control unconfined particulate matter from such activities. As an indication that these measures are sufficient, visible emissions from the facility shall not exceed 5% opacity. [Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]
14. Operation & Maintenance: At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions. [Rule 62-4.070(3), F.A.C.]
15. Records Retention: Records of the measurements/ MSDS sheets/ purchase orders/ “As Supplied” sheets/ tests/ reports required by this permit must be retained for at least three years following the date of the measurement, test or reporting [Rule 62-4.070(3), F.A.C.].

**SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. Emissions Units 001, 002 and 004**

**Emissions Units -001, -002, and -004 Performance Restrictions:**

<b>Emissions Units ID No.</b>	<b>Description</b>
001	Spray Booth Gelcoat Application;
002	Hand Lay-up, Closed/Open Molding & Curing; and,
004	Screen Printing

16. All major spray applications of gelcoat to molds shall be conducted inside the gelcoat spray booth.

**Recordkeeping Requirements**

17. Replacement of filters in the spray booth(s) shall be documented in a log containing the operator's name, signed initials, and date. [Rule 62-4.070(3), F.A.C.]

18. **VOC Recordkeeping:** The permittee shall determine the VOC content of all materials, including solvents; shall monitor the usage of such materials at the referenced emissions unit(s); and shall record and maintain the following information:

- a. The VOC content for each material containing or emitting VOCs;
- b. The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emissions unit(s);
- c. The total monthly VOC emissions rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month; and,
- d. A rolling consecutive 12-month total emissions rate for VOCs, calculated from the monthly totals for the previous twelve calendar months. [Rule 62-4.070(3), F.A.C.]

19. **HAP Recordkeeping:** The permittee shall determine the total and individual HAP contents of all materials, including solvents; shall monitor the usage of such materials at the referenced emissions unit(s); and shall record and maintain the following information:

- a. The individual and total HAP contents for each material containing or emitting HAPs;
- b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emissions unit(s);
- c. The individual and total monthly HAP emissions rates for each material, calculated from the monthly material utilization rates and the individual and total HAP contents, calculated for the preceding month no later than 10 days after the end of that month; and,

**SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. Emissions Units 001, 002 and 004**

- d. A rolling consecutive 12-month total emissions rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months. [Rule 62-4.070(3), F.A.C.]
20. If recordkeeping required in Specific Condition No.s 18 or 19 for any month yields individual HAP, total HAP, and total VOC emissions within 10% of their associated allowable emission limits as specified in Specific Condition No. 10, daily logs shall be required. Daily logs shall include monthly totals to demonstrate compliance with Specific Condition No. 10. [Rule 62-4.070(3), F.A.C.]

**SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS**  
**B. Emissions Unit 003**

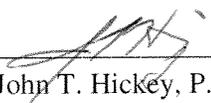
**Emissions Unit -003 Performance Restrictions:**

<b>Emissions Unit ID No.</b>	<b>Description</b>
003	Grinding Booth (Board Grinding/ Trimming)

- 21. All major trimming and grinding of skimboards and vaults shall be conducted inside the trimming/ grinding booth. [62-4.070(3), F.A.C.]
- 22. Replacement of filters in the trimming/ grinding booth shall be documented in a log containing the operator's name, signed initials, and date. [Rule 62-4.070(3), F.A.C.]

SARASOTA COUNTY PARKS, RECREATION AND NATURAL RESOURCES  
AIR & WATER QUALITY

  
\_\_\_\_\_  
Susan Cameron  
Environmental Specialist III  
Sarasota County Air & Water Quality

  
\_\_\_\_\_  
John T. Hickey, P.E.  
Manager  
Sarasota County Air & Water Quality

S12PC.020



**SECTION 5. APPENDICES**

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Contents

- Appendix A. Citation Formats and Glossary of Common Terms;
- Appendix B. General Conditions; and,
- Appendix C. Common Conditions

**CITATION FORMATS:**

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Permit Numbers

- Example: Permit Nos. 1150001-001-AC, 1150001-002-AF, 1150001-002-AO, or 1150001-002-AV
- Where:
- 115 represents Sarasota County, the county ID # in which the project is located;
  - 0001 represents the specific facility ID number for that county;
  - 001 identifies the specific permit project number;
  - AC identifies the permit as an air construction permit;
  - AF identifies the permit as a minor source federally enforceable state air operation permit;
  - AO identifies the permit as a minor source air operation permit; and
  - AV identifies the permit as a major Title V air operation permit.

Florida Administrative Code (F.A.C.)

- Example: [Rule 62-213.205, F.A.C.]
- Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

- Example: [40 CFR 60.7]
- Means: Title 40, Part 60, Section 7

**GLOSSARY OF COMMON TERMS**

- |   |  |
|---|--|
| ° F: degrees Fahrenheit   | AAQS: Ambient Air Quality Standard   |
| acf: actual cubic feet  | acfm: actual cubic feet per minute   |
| AQ/STM: Sarasota County Natural Resources, Air Quality/ Storage Tank Management | CO: carbon monoxide  |
|   | CO <sub>2</sub> : carbon dioxide   |
| ARMS: Air Resources Management System (DEP database)                            | COMS: continuous opacity monitoring system                                       |
| bhp: brake horsepower   | DARM: Division of Air Resource Management  |
| Btu: British thermal units  | DEP: Department of Environmental Protection                                      |
| CAM: compliance assurance monitoring  | Department: Department of Environmental Protection                               |
| CEMS: continuous emissions monitoring system                                    | dscf: dry standard cubic feet  |
| cfm: cubic feet per minute  | dscfm: dry standard cubic feet per minute  |
| CFR: Code of Federal Regulations  | EPA: Environmental Protection Agency   |
| BACT: best available control technology   | esp: electrostatic precipitator (control system for reducing particulate matter) |
| CAA: Clean Air Act  | EU: emissions unit   |
| CMS: continuous monitoring system   | F.A.C.: Florida Administrative Code  |
|   | F.A.W.: Florida Administrative Weekly  |

## SECTION 5. APPENDIX A

### Citation Formats and Glossary of Common Terms

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f.d.: forced draft	ppm: parts per million
F.S.: Florida Statutes	ppmv: parts per million by volume
fgd: flue gas desulfurization	ppmvd: parts per million by volume, dry basis
fgr: flue gas recirculation	QA: quality assurance
Fl: fluoride	QC: quality control
ft <sup>2</sup> : square feet	PSD: prevention of significant deterioration
ft <sup>3</sup> : cubic feet	psi: pounds per square inch
gpm: gallons per minute	PTE: potential to emit
gr: grains	RACT: reasonably available control technology
HAP: hazardous air pollutant	RATA: relative accuracy test audit
Hg: mercury	RBLC: EPA's RACT/BACT/LAER Clearinghouse
i.d.: induced draft	SAM: sulfuric acid mist
ID: identification	scf: standard cubic feet
kPa: kilopascals	scfm: standard cubic feet per minute
lb: pound	SCNR: Sarasota County Parks, Recreation and Natural Resources, Air & Water Quality
MACT: maximum achievable technology	SIC: standard industrial classification code
MMBtu: million British thermal units	SIP: State Implementation Plan
MSDS: material safety data sheets	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
MW: megawatt	SO <sub>2</sub> : sulfur dioxide
NESHAP: National Emissions Standards for Hazardous Air Pollutants	tpd: tons/day
NO <sub>x</sub> : nitrogen oxides	tph: tons per hour
NSPS: New Source Performance Standards	tpy: tons per year
O & M: operation and maintenance	TRS: total reduced sulfur
O <sub>2</sub> : oxygen	UTM: Universal Transverse Mercator coordinate system
Pb: lead	VE: visible emissions
PM: particulate matter	VOC: volatile organic compounds
PM <sub>10</sub> : particulate matter with a mean aerodynamic diameter of 10 microns or less	

**SECTION 5. APPENDIX B**

General Conditions

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**General Conditions:** The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of noncompliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

**SECTION 5. APPENDIX B**

General Conditions

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9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology N/A;
  - b. Determination of Prevention of Significant Deterioration N/A;
  - c. Compliance with New Source Performance Standards N/A.
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - (a) The date, exact place, and time of sampling or measurements;
    - (b) The person responsible for performing the sampling or measurements;
    - (c) The dates analyses were performed;
    - (d) The person responsible for performing the analyses;
    - (e) The analytical techniques or methods used;
    - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

[62-4.160, F.A.C., Permit Conditions]

**COMMON CONDITIONS:** Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

**Facility-wide Emissions and Controls:**

1. **Plant Operation - Problems:** If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.070(3) and 62-4.130, F.A.C.]
2. **General Pollutant Emissions Limiting Standards:** (a) No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by SCNR. {Permitting note: No vapor control device was deemed necessary at the time of issuance of this permit.}; (b). No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-210.200, 62-296.320(1) and (2), F.A.C.]
3. **General Visible Emissions Standard:** Except for emission units that are subject to a particulate emission limit or opacity limit set forth in, or established by rule and reflected by conditions elsewhere in the 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 opacity of which is equal to or greater than 20%. [Rules 62-4.070(3) and 62-296.320(4)(b)1., F.A.C.]
4. **Unconfined Emissions of Particulate Matter (PM):** Normal "good housekeeping" procedures and reasonable work practices shall be utilized to minimize unconfined particulate matter from any source including, **but not limited to**, material handling operations, vehicular movement, construction, alteration, demolition or wrecking, loading, unloading, storing and handling. Reasonable precautions shall include:
  - a. Paving and maintenance of roads, parking areas, and yards;
  - b. Application of water, or chemical dust suppressants, to control emissions from activities such as demolition of buildings, grading of roads, construction, and land clearing;
  - c. Application of water, or chemical dust suppressants, to facility grounds (e.g., unpaved roads, yards, open stock piles and similar emission units) as needed;
  - d. Landscaping or planting of vegetation;
  - e. Using applicable control equipment (e.g., hoods, fans, filters, baghouses, cyclones, conveyor enclosures, etc.);
  - f. Posting vehicle/truck speed limits so that vehicles and material handling equipment operate at slow speed to minimize emissions from traveling/working on facility grounds; and
  - g. Collecting, bagging and disposing of debris as needed;[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]
5. **Fugitive VOC/Organic Solvent (OS):** The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs), or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by SCNR. The following procedures shall be utilized to minimize pollutant emissions:
  - a. All VOC generating processes (i.e., application/use of sealants, adhesives, cleaners, paints/coatings, solvents, etc.) shall be conducted inside designated work areas (i.e., paint spray booth, lamination, etc.);

- b. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills;
- c. All solvent from solvent washings (e.g., equipment clean-up) shall be directed into containers that prevent evaporation to the atmosphere;
- d. All VOC/HAP/OS containing material containers shall be closed/covered when not in use to prevent odors and volatilization; and
- e. All VOC/HAP/OS spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

[Rules 62-4.070(3) and 62-296.320(1), F.A.C.]

6. Objectionable Odor(s): No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-210.200 and 62-296.320(2), F.A.C.]

7. Anytime the emissions unit is found to be performing inadequately because of overloading, neglect, or other reasons, the permittee shall discontinue its use until measures are provided to correct the cause of such performance. [Rule 62-4.070(3), F.A.C.]

8. Excess Emissions: The following excess emissions provisions cannot be used to vary any NSPS requirements from any subpart of 40 CFR 60:

- a. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to, and the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by SCNR for longer duration;
- b. Excess emissions which are caused entirely or in part by inadequate maintenance/ operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited.

[Rules 62-210.700(1) and (4), F.A.C.]

9. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

10. Source Obligation:

- a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
- b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rules 62-212.400(12)(b) and (c), F.A.C.]

11. Emissions Computation and Reporting:

- a. Applicability. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]
- b. Computation of Emissions. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
- (1) Basic Approach. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
- (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (2) Continuous Emissions Monitoring System (CEMS).
- (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
- 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
- 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
- 1) A calibrated flow meter that records data on a continuous basis, if available; or
- 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) Mass Balance Calculations.

- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
    - 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
    - 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
  - (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
  - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
    - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
    - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
    - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
  - b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.

- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rules 62-4.070(3) and 62-210.370(2), F.A.C.]

**Facility-wide Recordkeeping and Reporting Requirements:**

12. Operation and Maintenance (O & M) Plan Documentation: The permittee shall maintain an O & M plan, and records documenting the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; or any malfunction of the air pollution control equipment. The records shall be recorded in a permanent form suitable for inspection and shall be retained for at least 3 years. [Rule 62-4.070(3), F.A.C.]
13. Records Retention: The permittee shall retain at the facility records of all monitoring information (including all calibration/maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. Records shall be recorded in a permanent form suitable for inspection by SCNR, DEP, and/or EPA, and shall be available upon request. These materials shall be retained on site for a minimum of the most recent three (3) consecutive year period from the date of the sample, measurement, report, or application. [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]