

STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. 0550036-012-AV

APPLICANT

The applicant for this project is Alpha General Services, LLC. The applicants' responsible official and mailing address are Brian Radonski, General Manager for the Alpha General Services Facility at 1578 Alpha Road, Sebring, Florida 33870.

FACILITY DESCRIPTION

The applicant operates the existing Alpha General Services Facility, which is in Highlands County in Sebring, Florida.

This facility manufactures fiberglass tanks. Activities include coating molds with fiberglass-resin to build up the walls of the tanks or other components/parts. The facility is a major source for Hazardous Air Pollutants (HAPs), (mainly styrene) from the resins and gel coating operations, and is therefore subject to 40CFR63 Subpart WWW, for Reinforced Plastic Composites Production, and is subject to the controls and restrictions in that subpart. This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	Fiberglass tank manufacturing facility

APPLICABLE REGULATIONS

Based on the Title V air operation permit renewal application received on October 1, 2025, this facility is a major source of hazardous air pollutants (HAP). The existing facility is not a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
<i>Federal Rule Citations</i>	
40 CFR 63, Subpart A, NESHAP General Provisions	All
40 CFR 63, Subpart WWW for Reinforced Plastic Composites Production	All
<i>State Rule Citations</i>	
62-210.300(1) F.A.C. Air Construction Permits	All
62-210.350 Public Notice and Comment	All
62-210.350(1) F.A.C. Public Notice of Proposed Agency Action	All
62-210.350(3) F.A.C. Additional Public Notice Requirements for source Subject to Operating Permits for Title V Source.	All
62-210.370(3) F.A.C. Annual Operating Report for Air Pollution Emitting Facility	All
62-210.400 F.A.C. Emission Estimates	All
62-210.650 F.A.C. Circumvention	All
62-213.205 F.A.C. Annual Emissions Fee	All
62-213.400 F.A.C. Permits and Permit Revision Required	All
62-213.900(1) F.A.C. Major Air Pollution Source Annual Emissions Fee form	All
62-296.320(4) F.A.C. Unconfined Emissions of Particulate Matter	All
62-296.320(2) F.A.C. Objectionable Odor Prohibited	All
62-297.310 F.A.C. General Test Requirements	All

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Regulation	EU No(s).
62-297.330 F.A.C. Applicable test Requirements	All
62-297.340 F.A.C. Frequency of Compliance Tests	All
62-297.345 F.A.C. Stack Sampling Provided By the Owner of an Emissions Unit	All
62-297.570 F.A.C. Test Report	All

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities (e.g. indoor grinding and sanding).

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility. This renewal updates requirements that changed in the NESHAP Subpart WWWW since the last renewal.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

- Application for a Title V Air Operation Permit Renewal received **October 1, 2025**
- Draft permit package was issued on **December 16, 2025**
- Proposed permit package was issued on **January 28, 2026**

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 3033.

North American Industry Classification System (NAICS): 326191 Plastics Mfg.

HAP: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.). Facility-wide potential emissions of HAPs (styrene) exceed 10/25 tons/year for individual/total HAPs.

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63 Subpart WWWW.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the

GHG: The facility is not identified as a major source of greenhouse gas (GHG) pollutants.

PROJECT REVIEW

This renewal incorporates Project 0550036-010-AC which removed the 40 tpy emission caps for each of the following: HAPs and VOCs. The facility has been subject to the emission controls of NESHAP Subpart WWWW since it was built. Other changes to the permit from this renewal include reformatting, replacement of the old appendix language with the new Appendix TV, streamlining of EU sections by moving certain common conditions to the new appendices. Changes to the permit made as part of this project include incorporating EPA's latest changes to 40 CFR 63 Subpart WWWW including the removal of provisions for startup/shutdown/malfunction which the historic NESHAP Subpart WWWW had provided exceptions for these operational periods. The latest/revised NESHAP is copied into the appendix, and the following conditions of the prior TV permit were changed: Section III, Condition A.13, A.19, A.21 and A.23, each were changed to remove any exceptions during periods of startup/shutdown or malfunction.

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This facility has no add on controls for HAP emissions and will continue to comply with the NESHAP by tracking the styrene containing materials (resins, gel coats) and the application methods and then monthly calculating emissions and comparing it, on a 12-month rolling average basis, to the 40 CFR 63 Subpart WWWW Table 3 emissions, in units of lbs of HAP emissions per ton of materials (resins, gel coat) used. Twice a year the company is required to report any permit or emissions rate deviations to the compliance authority.

CONCLUSION

This project renews Title V Air Operation Permit No. 0550036-009-AV, which was effective on 08/06/2021. The Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.