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Fact-O-Bake of Pensacola, Inc.
Auto Body Work and Painting Facility
Facility ID No.: 0330144
Escambia County

Air Operation Permit
Permit No.: 0330144-002-AO

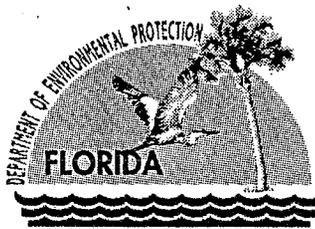
Permitting and Compliance Authority
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Northwest District Office
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Pensacola, FL 32501-5794
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Jeb Bush
Governor

Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

Permittee:
Fact-O-Bake of Pensacola, Inc.

Permit No.: 0330144-002-AO
Facility ID No.: 0330144
SIC Nos.: 7532
Project: Air Operation Permit

This permit is for the operation of the Auto Body Work and Painting Facility located at 5470 Pensacola Boulevard in Pensacola, Escambia County; UTM Coordinates: Zone 16, 476.5 km East and 3371.0 km North; Latitude: 30° 28' 20" North and Longitude: 87° 14' 41" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210. 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 G-1, General Conditions

Effective Date: February 9, 2000
Renewal Application Due Date: December 11, 2004
Expiration Date: February 9, 2005

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Ed K. Middleswart, P.E.
Air Program Administrator

EKM/TR

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Section I. Facility Information.

Subsection A. Facility Description.

Activities at this facility consist of auto body work and painting. Averages of 50 vehicles per week, mostly passenger cars, are processed. Small dents may be pulled out and filled with body filler, the auto bodies are sanded, and trim and glass are masked. The autos are then painted with a primer coat, a primer sealer coat, an enamel base coat and a color paint coat. Occasionally, cars may also receive a final coat of sealer. The painting is done inside of a paint booth that exhausts through twin stacks equipped with axial blowers. The newly painted cars are then moved to the natural gas-fired bake oven and then to a final drying location for final curing and paint hardening. The bake oven atmosphere is recycled in a closed loop heating cycle. In accordance with Rule 62-210.300(3)(b)1, F.A.C., the natural gas-fired bake oven is exempt from permitting. After the paint has cured, the cars may go through a buffing and touch-up step. Spot painting, consisting of painting panels or small areas of a vehicle (hoods, trunks, doors, door jams, etc.), is performed in a small, single car cross-flow spot paint booth. Particulate emissions are controlled by a single wall of paint-collecting filters. Filtered air is vented through a stack that exits through the building roof. Stacks for both the paint booth and spot paint booth are not subject to any source specific emission limit, but are subject to the limits described in the General Conditions of this permit.

Based on the permit application received January 18, 2000, this facility is not a major source of hazardous air pollutants (HAPs).

Construction permit AC17-258054 issued December 27, 1994, included enforceable permit conditions establishing this facility as a minor source. The construction permit limited emissions of any individual HAP to less than 10 TPY, total HAPs to less than 25 TPY, and VOCs to less than 25 TPY.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID

<u>No.</u>	<u>Brief Description</u>
001	Auto Body Work & Painting Shop

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, they are specifically related to this permitting action.

These documents are on file with permitting authority:
Permit Application received January 18, 2000

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee 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. 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. All containers used for temporary and permanent storage of VOC-containing fluids and/or VOC-soaked cleaning rags shall be tightly covered to prevent vaporization of VOC when not in use. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of VOC materials.
[Rule 62-296.320(1)(a), F.A.C.]
5. Reasonable precautions shall be taken to prevent emissions of unconfined particulate matter at this facility. All fugitive dust generated at this site, including but not limited to that from sanding or grinding operations, shall be adequately controlled by existing good housekeeping practices such as periodic sweeping and/or vacuuming of work areas, and closing doors on windy days. Paint booth air filters shall be maintained in such a way as to insure proper air flow and cleaning efficiency.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
6. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in FAC Rule 62-4.050(4) to the Northwest District office of the Department.
[Rule 62-4.090, F.A.C.]

7. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

8. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364, press 7; Fax: 850/595-8096

9. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, extension 1220, day or night, and for emergencies involving a significant threat to human health or the environment is (800) 320-0519. For routine business, telephone (850) 595-8364, then press 7, during normal working hours.
[Rules 62-210.700 and 62-4.130, F.A.C.]

Recordkeeping and Reporting Requirements

10. VOC and HAP emissions shall be tracked on logs commencing from the date of issuance of this permit with monthly materials usage and emissions calculations based on the VOC and HAP content (wt %) of the materials used. As a minimum, the logs shall include:

- Identification of the raw materials (solvents, coatings) used,
- Quantity and composition of the materials used identifying total VOC content, total HAP content, and individual HAP content for each material used.
- VOC, HAPs, and individual HAP emissions based on materials usage.

11. Monthly summaries and rolling twelve month averages shall be certified and signed by responsible company representative to be accurate and truthful calculated representations of actual emissions. Monthly summaries and rolling twelve month averages of emissions shall be kept and maintained for Department inspection for at least five years.

12. Permittee shall install, use, and maintain appropriate systems to gather data necessary to track VOC and HAP emissions.

[Rules 62-4.070 and Rule 62-210.200(PTE), F.A.C., Construction permit 0330262-001-AC]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID

<u>No.</u>	<u>Brief Description</u>
001	Auto Body Work & Painting Shop

Activities at this facility consist of auto body work and painting. Averages of 50 vehicles per week, mostly passenger cars, are processed. Small dents may be pulled out and filled with body filler, the auto bodies are sanded, and trim and glass are masked. The autos are then painted with a primer coat, a primer sealer coat, an enamel base coat and a color paint coat. Occasionally, cars may also receive a final coat of sealer. The painting is done inside of a paint booth that exhausts through twin stacks equipped with axial blowers. The newly painted cars are then moved to the natural gas-fired bake oven and then to a final drying location for final curing and paint hardening. The bake oven atmosphere is recycled in a closed loop heating cycle. In accordance with Rule 62-210.300(3)(b)1, F.A.C., the natural gas-fired bake oven is exempt from permitting. After the paint has cured, the cars may go through a buffing and touch-up step. Spot painting, consisting of painting panels or small areas of a vehicle (hoods, trunks, doors, door jams, etc.), is performed in a small, single car cross-flow spot paint booth. Particulate emissions are controlled by a single wall of paint-collecting filters. Filtered air is vented through a stack that exits through the building roof. Stacks for both the paint booth and spot paint booth are not subject to any source specific emission limit, but are subject to the limits described in the General Conditions of this permit.

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

Emission Limitations and Standards

A.1. Capacity. The maximum allowable emissions of Volatile Organic Compounds (VOCs) shall not equal or exceed 25 Tons VOC/year, including emissions from all VOC-emitting activities.

[F.A.C. Rules 62-4.160(2) and 62-210.200(PTE), Construction Permit 0330144-001-AC]

A.2. All fugitive dust generated at this site, including but not limited to that from sanding or grinding operations, shall be adequately controlled by existing good housekeeping practices such as periodic sweeping and/or vacuuming of work areas, and closing doors on windy days.

[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

A.3. Hours of Operation. The Auto Paint Shop and Spray Booth may operate 3,900 hrs/yr, based on three ten-hour days and two twenty-four-hour days per week, and 50 weeks per year.

[FAC Rule 62-4.070, 62-4.160(2), 62-210.200(PTE), and construction permit application]

A.4. Visible Emissions tests are required to show compliance with the standards of the Department. In accordance with Rule 62-296.320, F.A.C., emissions exiting the facility shall not have opacity greater than 20% . No car throughput capacity, such as cars processed per day, is established in this permit.

Capacity sufficient for testing shall be achieved when painting is taking place in both paint booths and sanding/grinding operations are active. The visible emissions test shall be conducted in accordance with DEP Method 9 for 30 minutes. The test shall be conducted once in the life of the permit and within 90 days of a permit renewal submission. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.
[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

A.5. The test reports shall comply with applicable portions of F.A.C. Rule 62-297.310, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.
[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

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GENERAL CONDITIONS:

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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, Florida Statutes. 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 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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 does not constitute 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 the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does 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, are 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of this permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,
 - c. Sampling or monitoring 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 exact 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

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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.

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 proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with 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.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. 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:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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.