Florida Department of

Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Howard Ard
DATE: September 24, 2012
SUBJECT: Evaluation Summary for Textured Coatings of America, Inc., Panama City Site 0050052-004-AO, Bay County

We recommend issuing a permit to Textured Coatings of America, Inc., to operate their Panama City Site. This permit follows 0050052-003-AO, effective November 2, 2007.

Permit AC03-213241, issued June 4, 1992, and all subsequent permits up to the current permit, limited visible emissions (VE) to 5% and required annual VE testing to show compliance. Past VE tests have been consistently below 5% and PM emissions are controlled at less than one ton/year. Based on these results and rule and guidance changes, the facility will no longer be required to perform VE testing to show compliance. However, the General Visible Emissions Standards and Special Compliance Tests still apply to this facility.

Permit AO03-224460, issued May 28, 1993, and Permit 0050052-001-AO, issued March 11, 1998, limited the facility throughput to 524,000 gallons per year and required VOC emissions tracking based on product group formulations. VOC emissions were estimated to be approximately 32.5 tons/year. A Department letter to Michael G. Long, P.E., Cornerstone Engineering, Inc., dated August 19, 2002, suggested limiting VOC emissions by limiting facility throughput, and recommended using actual quantities of products to estimate VOC emissions. Permit 0050052-002-AO, issued October 15, 2002, and Permit 0050052-003-AO, issued November 2, 2007, limited the facility to a throughput resulting in less than 23.1 tons/year VOC emissions, and required emissions tracking based on actual quantities of products or constituents used. These permits referenced permit AC03-213241 which stated, in the facility description section, that VOC emissions are controlled at a rate of 23.1 tons per year, based on a production throughput of 552,000 gallons/year and an emission factor of 1% of VOC emitted per ton of product produced. This method of limiting VOC emissions by limiting facility throughput is carried forward into this permit. Permit AC03-213241 limited annual production throughput to 552,000 gallons per year which equates to a VOC emissions limitation of 34.8 tons/year, based on the VOC emission factor for paint manufacturing given in AP-42, Table 6.4-1.

Process Description

This facility is a textured wall coatings production facility. (SIC 2851) Wall coatings are made in 5-gallon to 2,000-gallon batches in stationary mixers.

Pollution Control Equipment

Particulate emissions are collected in hoods that are ducted into a Dust-Hog model FJH32-4-H dust collector, with a cartridge system efficiency factor of 99.93%. Additionally, two box fans are used for ventilation in the large vat mixing area, with emissions controlled by replaceable filters. VOC emissions are emitted uncontrolled but facility annual VOC emissions are limited by limiting production throughput.

Environmental Impact.

Airborne Contaminant Emitted	Emission Factors lbs/ton	FAC Rule	Estimated Emissions Tons/year	Allowable Emissions Tons/year
VOC	30	62-4.070	N/A	34.8
PM	20	N/A	0.004	N/A
Objectionable Odors		62-296.320(2)	N/A	None allowed off plant property
VE		62-296.320(4)(b)	N/A	Not more than 20% opacity

Emission Factors used in this table are from AP-42 Table 6.4-1.

Applicable Rules & Regulations. This source is regulated in accordance with Rule 62-210.320, F.A.C., the General Pollutant Emission Limiting Standards.

Compliance Monitoring.
Recordkeeping to track VOC and HAP emissions.

Compliance History.
The facility has been consistently within permitted limits. File review shows no record of non-compliance within the last five years.

Fee Summary. This is an AO2B ($1,000 fee) minor source with no stack test. Appropriate fee was submitted.

Attachment

HA/c