Textured Coatings of America, Inc.
Panama City Site
Facility ID No.: 0050052
Bay County

Air Operation Permit
Permit No.: 0050052-004-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, FL 32502-5740
Telephone: 850/595-8300
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[Electronic file name: 0050052-004-AO.doc]

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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Northwest District
160 W. Government St., Suite 308
Pensacola, Florida 32502-5740

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SECRETARY

Permittee:
Textured Coatings of America, Inc.

Permit No.: 0050052-004-AO
Facility ID No.: 0050052
SIC No(s).: 28, 2851
Project: Air Operation Permit

This permit is for the operation of the Panama City textured wall coatings production facility located on the south side of State Road 30A, approximately 1/4 mile west of County Road 2337, Bay County; UTM Coordinates: Zone 16, 631.3 km East and 3338.5 km North; Latitude: 30° 10' 21" North and Longitude: 85° 38' 10" 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 and 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.

Effective Date: September 25, 2012
Renewal Application Due Date: July 27, 2017
Expiration Date: September 25, 2017

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

/s/

Rick Bradburn
Air Program Administrator

RB/ha/c

Section I. Facility Information.

This is a renewal of Permit 0050052-003-AO, effective November 2, 2007.

Subsection A. Facility Description.

This facility is a textured wall coatings production facility. Wall coatings are made in 5-gallon to 2,000-gallon batches in stationary mixers. Particulate emissions are collected in hoods that are ducted into a Dust-Hog model FJH32-4-H dust collector. Additionally, two box fans are used for ventilation in the large vat mixing area, with emissions controlled by replaceable filters. Volatile organic compounds (VOC) emissions are uncontrolled.

Based on the permit application received September 14, 2012, this facility is not a major source of hazardous air pollutants (HAP).

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

Facility ID No. 0050052	
EU ID No.	**Emissions Unit Brief Description**
001	Paint Mfg, including a PM Collection & Filtration System

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.

<u>These documents are provided to the permittee for information purposes only:</u>
Permit Application received September 14, 2012.

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 that 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. 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 standards 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 that 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. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rule 62-297.310(7)(b), F.A.C.]

5. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

6. 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, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

All containers that are used for temporary and permanent storage of VOCs or organic solvents shall be covered where feasible to prevent vaporization of VOCs when not in use. All equipment, pipes, hoses, lids, fittings, etc., shall be operated in such a manner so as to minimize leaks and/or fugitive emissions and spills of volatile materials.
[Rule 62-296.320(1), F.A.C.]

7. 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. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a) Proper maintenance and disposal of exhaust fan filters and protection of dust containers from wind action that might result in dust becoming airborne.
b) Periodic removal of particulate matter from buildings or work areas by sweeping and/or vacuuming and closing doors on windy days as needed.
c) Usage of portable dust collectors and dust suppressants in work areas and other areas as necessary to control emissions.

[Rule 62-296.320(4)(c)2., F.A.C.]

8. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit a permit renewal application using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department. You can obtain a permit application form or apply for permit renewal electronically at the following web address: http://www.dep.state.fl.us/air/emission/permitting.htm. [Rule 62-4.090, F.A.C.]

9. 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 W Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300; Fax: 850/595-8096

Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. A copy of all compliance related notifications shall be sent to the Northwest District Branch Office in Panama City at 2353 Jenks Ave, Panama City FL 32405.

10. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-0578, day or night, and for emergencies involving a significant threat to human health or the environment is 800/320-0519. For routine business, telephone 850/595-8300 during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emission unit.

EU ID No.	Emissions Unit Brief Description
001	Paint Mfg, including a PM Collection & Filtration System

This emissions unit consists of stationary mixers used to make wall coatings in batches ranging in size from five gallons to 2,000 gallons. The product mixture is comprised of approximately 80% liquids (solvents and resins) and 20% solids (pigments and fillers). 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%. 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.

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, facility-wide 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.

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

Essential Potential to Emit (PTE) Parameters

A.1. Capacity
The facility is limited to a production throughput resulting in less than 34.8 tons/year VOC emissions, based on an emission factor of 30 pounds of VOC emitted per ton of product produced, as provided in AP-42, Table 6.4-1. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and permit AC03-213241]

A.2. Hours of Operation: This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.3. Volatile Organic Compounds: The maximum allowable emissions of VOC shall not equal or exceed 34.8 tons per consecutive 12-month period, including emissions from all VOC-emitting activities associated with this emissions unit. [Rule 62-4.070(3), F.A.C., and permit AC03-213241]

Recordkeeping and Reporting Requirements

A.4. Permittee shall install, use, and maintain appropriate systems to gather data necessary to track VOC and HAP emissions, and materials usage. [Rules 62-4.070(3) and 62-210.200 (PTE), F.A.C.]

A.4.a. VOC and total HAP emissions shall be tracked on logs showing monthly materials usage and material composition, and emissions calculations based on acceptable emission factors. Emission factors contained in AP-42, Table 6.4-1 are:

PM emission factor is 20 pounds of pigment emitted per ton of pigment used, and
VOC emission factor is 30 pounds of VOC emitted per ton of product produced.

At a minimum, the logs shall include:

- Identification of the raw materials (solvents, coatings, etc.) used,
- Quantity materials used, total VOC and HAP content of materials, and individual HAP content for each material identified,
- VOC, HAP and individual HAP emissions based on materials usage and emission factors.

A.4.b. Monthly summaries shall be certified and signed by responsible company representative to be accurate and truthful calculated representations of actual emissions. Monthly summaries of emissions and materials usage shall be totaled for each consecutive 12-month period. The summaries shall be completed no later than the 15th of each month, and shall be kept and maintained available for Department inspection for at least five years.

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. 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 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 and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this 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 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 recurrence of the noncompliance. The permittee shall be responsible for any and all damages that 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 Department approves the transfer.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

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 measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- 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.