



Florida Department of Environmental Protection

Memorandum

TO: Sandra F. Veazey *SD 6/28/06*
FROM: Kevin M. White, P.E.
DATE: June 27, 2006
SUBJECT: Evaluation Summary for Bell Signs, Inc., 0050089-002-AO, Bay County

We recommend issuing a permit to Bell Signs, Inc. to operate their Panama City facility.

Process Description. This is a commercial facility, which manufactures indoor and outdoor signs for commercial and industrial establishments. Production activities are located inside an industrial type building and consist of activities such as plastic cutting and forming, metal cutting and forming, machine welding and final painting. Air emissions are created by spray-painting activities where parts are assembled and then sprays within five separate paint booths. Air emissions are controlled by filter media within the paint booths and the remaining exhaust is emitted with a building stack.

All activities, except for the spray booths operations are exempt from air permitting and the basis for the exemptions are as follows:

<u>Activity</u>	<u>Basis for Exemption</u>
Gas-fired heater 1.65 MMBtu/hr	62-210.300(3)(a)21., F.A.C.
Machine welding	62-210.300(3)(a)16., F.A.C.

Pollution Control Equipment. Filter media (fiberglass disposable filters) are used to control the VOC overspray emissions from the facility's 5 spray booths.

Environmental Impact.

Airborne Contaminant Emitted ¹	FAC Rule	Estimated Emissions ² Tons/yr	Allowable Emissions Tons/yr ³
PM	N/A	N/A	N/A
SO ₂	N/A	N/A	N/A
VOC	N/A	7.3	25
NO _x	N/A	N/A	N/A
CO	N/A	N/A	N/A
Individual HAP	N/A	0.40	10
Total HAPs	N/A	2.33	25
Objectionable Odors	62-296.320(2)	N/A	None allowed off plant property
VE	62-296.320(4)(b)1	V/A	Not more than 20% opacity

1 Source does emit PM, CO, and NO_x from cutting, grinding and welding activities; or from the exempt gas fired heater associated with main paint booth. These emissions are considered insignificant and have not been included above.

2. The estimated potential emissions are slightly different than those provided in the permit application (Department spreadsheet attached). It is our opinion that some of the application calculations are incorrect.

3. The allowable emissions are limited due to the permit application fee associated with this construction permit and the Title V major source thresholds.

Applicable Rules & Regulations. This source is not subject to any activity specific applicable regulation.

Compliance Monitoring. The permittee shall maintain monthly and rolling 12-month cumulative records of the total gallons of paint/sealer used. If a summation of 12 consecutive months of these records exceeds 25 tons/year of total VOC or 25 tons/year of total HAP or 10 tons/year of individual HAP, then the current air permit requirements and fee category shall be reevaluated for sufficiency. No testing is required since the spray booths are only subject to the general visibility standard of 20% opacity. Special compliance testing may be required if deemed necessary by the Department.

Compliance History. This facility has no compliance history. This facility was previously exempt but now requires a permit since it has the potential to emit more than 1,000 lbs/year of HAPS in accordance with Rule 62-210.300(3)(b), F.A.C. The facility was notified by the Department's October 11, 2005 letter of the necessity to submit an air construction permit application. An AC application was received by the Department on April 21, 2006 after the Air Compliance/Enforcement Section issued Warning Letter NWAP 005-1637, dated March 13, 2006. The enforcement case was resolved by SFCO, executed on May 9, 2006 and penalty payment of \$1,500.00 assessed and paid.

Fee Summary. This is an AO2C application and the correct fee of \$750 dollars. The facility submitted a fee of \$1,000 for an AO2B, expecting to be required to conduct VE testing, but was refunded \$250 based on the information contained in the Compliance Monitoring section above.

KMW:kwc