Florida Department of Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Angelia Jackson
DATE: June 28, 2011
SUBJECT: Evaluation Summary for Entera Inc., 0050089-003-AO, Bay County

We recommend issuing a permit to Entera Inc., to operate their Panama City facility. This permit follows 0050089-002-AO, effective June 28, 2006, and incorporates 0050089-001-AC, effective June 5, 2006.

Process Description.
This facility 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 assembly and then spraying within five separate paint booths.

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

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
VOC	N/A	N/A	3.32	N/A	25
HAP (Individual)	N/A	N/A	0.026	N/A	<10
HAP (Total)	N/A	N/A	1.39	N/A	<25
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE[2]	N/A	N/A	N/A	Not more than 20% opacity	

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 state regulation.
The facility is classified as an area source and may be subject to 40 CFR 63 subpart CCCCCCC (7C) - Paints and Allied Products Manufacturing. The Department has not adopted this federal standard as of June 2011.

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 will be 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.
2011 - Facility noted to be "In-Compliance."
2008 – Facility noted to be "In-Compliance."
2006 - The enforcement case was resolved by SFCO, executed on May 9, 2006 and penalty payment of $1,500.00 assessed and paid.
2005 - This facility was previously exempt but now requires a permit, since it has the potential to emit more than 1,000 lbs/year of HAP 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 (AC) 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. This enforcement case is not yet resolved.

Fee Summary.
This is an AO2C ($750.00 fee) minor source with no test. The original construction permit fee was $1,000.00 for an AC1E facility (source more than 5 tons/yr but less than 25 tons/yr).

The facility submitted a fee of $1,000.00 for an AO2B, expecting to be required to conduct VE testing, but was refunded $250.00 based on the information contained in the Compliance Monitoring section above.

AMJ/c