TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Vac-Con, Inc.
969 Hall Park Drive
Green Cove Springs, Florida 32043

Facility ID No. 0190031

PROJECT

Project No. 0190031-010-AF
Application FESOP
Renewal

COUNTY

Clay

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
Waste and Air Resource Management
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

June 04, 2014

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters:

Table 1 - Applicable Rules from the F.A.C.

Chapter	Description
62-4	Permits
62-204	Air Pollution Control – General Provisions
62-210	Stationary Sources of Air Pollution – General Requirements
62-212	Stationary Sources – Preconstruction Review
62-296	Stationary Sources – Emission Standards
62-297	Stationary Sources – Emissions Monitoring

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial activities. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories.

Federal regulations adopted by reference are given in Rule 62-204.800, F.A.C. State regulations approved by EPA are given in 40 CFR 52, Subpart K – Florida, also known as the State Implementation Plan (SIP) for Florida.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Process Description and Location

Vac-Con, Inc., is an existing Vacuum Truck Surface Coating and Grit Blasting Operation, which is categorized under Standard Industrial Classification Code No. 7532. The facility is located in Clay County at 969 Hall Park Drive, Green Cove Springs, Florida. The UTM coordinates of the existing facility are Zone 17, 435.0km East, and 3316.1 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a synthetic Non-Title V source.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility has no emissions units subject to NESHAP (40 CFR 61 or Part 63)

Processing Schedule

6/4/14 Department received the Application for Air Permit – Long Form

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of the draft permit distributed with this evaluation.

2. APPLICATION REVIEW

Discussion of Emissions (EU001)

Pollutant	Maximum Allowable Emissions Rate * Note	Rule
Any Individual HAP	9.5 tons/year	62-4.160(2), F.A.C. and emissions cap requested by applicant on April 6, 2004.
Total HAPs	23.0 tons/year	62-4.160(2), F.A.C. and emissions cap requested by applicant on April 6, 2004.

*Note: Limits established to escape Title V classification.

Calculations submitted with project 007-AF show that the weight percent of total HAPs in the lacquer thinner being used is 2.229 tons per 1000 gallons, and the weight percent of the highest concentration individual HAP (toluene) is 1.080 tons per 1000 gallons. The synthetic limit in Condition A.1. of 8540 gallons per year yields a total potential to emit of 19.036 tons per year for total HAPs, and 9.22 tons per year of the highest concentration individual HAP. Both of these are below the major source threshold, as well as below the limits set in Condition A.3. noted above.

Discussion of Emissions (EU005 & 006) Control Unit. The emissions from the metal cutting and grit blasting operations shall be controlled by the permitted baghouses as stated below.

Emissions Unit	Control Unit
005 – Abrasive Blasting Operation	Abrasive Blasting Booth Dust Collector (Manufacturer: Pinnacle Central Company, Inc.)
006 – Plasma Metal Cutting Operation	Messer Dust Collector (Manufacturer: Donaldson Company, Inc., Model: DF-T4-32)

The owner or operator shall operate the baghouse during normal operation (including start-up, shutdown, and whenever the dust is generated from the operation). If there is a malfunction on the control unit, the owner or operator shall shut down the operation and the baghouse fan immediately to minimize excess emissions. *{Permitting Note: These EUS are only subject to the less than 20% Opacity standard which is applied on a facility-wide basis. No annual or prior to permit renewal VE compliance testing is required. However, if the Department believes the VE standard is being violated, a special compliance test can be requested pursuant to Rule 62-297.310(7)(b), F.A.C..}*

[Rule 62-210.700(1) and 62-210.650, F.A.C]

State Requirements

[Rule 62-210.370 (1), F.A.C.; Rule 62-210.370 (2)(h), F.A.C.; Rule 62-210.700(1), F.A.C.; Rule 62-4.070 (2), and 62-4.160, F.A.C.]

3. DETERMINATION

The Department makes a determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Brent Steele is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, Northeast District Office, 8800 Baymeadows Way West, Suite 100, Jacksonville, FL 32256, Phone: 904/256-1700.