FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

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

Air Permit No.: 0190031-010-AF
Issuance Date: June 5, 2014
Expiration Date: June 5, 2019

Authorized Representative:

Mr. Bob Graden, Plant Manager

Federally Enforceable State Operation Permit Renewal

This is the final Federally Enforceable State Operation Permit (FESOP) for Vac-Con, Inc. The existing facility manufactures sewer cleaning, sewer flushing, industrial vacuum, and hydro excavating devices for truck mounted operations. (Standard Industrial Classification No. 7532).

The facility is located in Clay County at 969 Hall Park Drive, Green Cove Springs, Clay County, Florida. The UTM coordinates are Zone 17, 435.0km East, and 3316.1 km North.

This final permit is organized by the following sections.

Section 1. General Information
Section 2. Administrative Requirements
Section 3. Emissions Unit Specific Conditions
Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Richard S. Rachal III, P.G. June 5, 2014
Program Administrator
Waste and Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on **June 5, 2014**, to the persons listed below.

Mr. Bob Graden, Plant Manager, Vac-Con, Inc.:BobG@Vac-Con.com
Mr. Brad Tompa, Environmental Department Manager, Terracon: bstompa@terracon.com
Mr. John Malkowski, P.E., Terracon: jcmalkowski@terracon.com

Clerk Stamp
FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) June 5, 2014

FACILITY AND PROJECT DESCRIPTION

This facility manufactures sewer cleaning, sewer flushing, industrial vacuum, and hydro excavating devices for truck mounted operations. Devices are truck mounted on site or sold for off-site truck mounting. Air pollution sources at the facility include three paint spray booths, an automated plasma metal cutter with dust collector and an abrasive blast booth with dust collector. The paint booths are equipped with filter media (low velocity mist eliminators) to capture the paint aerosol. The primary hazardous air pollutant (HAP) emissions from the surface coating operation include Toluene, Methyl Alcohol, Xylene and Ethyl Benzene. There are also non-HAP VOC emissions generated from the surface coating operation, which include Butyl Acetate, Methyl Amyl Ketone, MEK and VM&P Naphtha.

This project is for the renewal of the Federally Enforceable State Operation Permit (FESOP) 0190031-009-AF.

Existing Facility

E.U. ID No.	Emissions Point Description
001 – Vacuum Truck Surface Coating Operation	001 – Paint Booth No. 1 002 – Paint Booth No. 2 004 – Paint Booth No. 4
005 – Abrasive Blasting Operation	001 – Abrasive Blast Booth Dust Collector
006 – Plasma Metal Cutting Operation	001 – Messer Dust Collector

EU 005 -- The abrasive blast booth dust collector (Manufacturer: Pinnacle Central Company, Inc.) is a cartridge filter that consists of 32 filters and pulse cleaning mechanism. The air to cloth ratio is 2:1 and the maximum volumetric flow is 16,000 cfm @ 6” standard pressure. The control system also includes 30 horse power fan and motor.

EU 006 -- The Messer Dust Collector (Manufacturer: Donaldson Company, Inc., Model: DF-T4-32) is a cartridge dust collector that consists of 32 filters, pulse cleaning mechanism, and a nominal air flow of 6000 acfm.

FACILITY REGULATORY CLASSIFICATION

This facility is classified as a synthetic non-Title V source due to federally enforceable limit established for the material usage and air pollutant emissions rates.

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Application for Air Permit-Long Form received June 4, 2014

SECTION 2. ADMINSITRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Air Program, Florida Department of Environmental Protection (Department). The Northeast District's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the North East District Office. The mailing address and phone number of the District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 904/256-1700.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the owner or operator from compliance with any applicable federal, state, or local permitting or regulations.

   [Rule 62-210.300, F.A.C.]

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

   [Rule 62-4.080, F.A.C.]

6. Modifications: The owner or operator shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.

   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. A completed **Application for Non Title V Air Permit Renewal** [DEP Form No. 62-210.900(4)] shall be submitted to the Department at least 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the owner or operator shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.

   [Rules 62-4.050, 62-4.090, F.A.C.]

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Vacuum Truck Surface Coating Operation: EP01 – Paint Booth No. 1; EP02 – Paint Booth No. 2; EP04 – Paint Booth No. 4

PERFORMANCE RESTRICTIONS

A.1. Maximum Usage: Lacquer thinner [Dupont 106 Gun Cleaner (formerly known as Dupont Nason Select 481-16) or equivalent material] usage shall be limited to 8540 gallons per year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. Hours of Operation: The hours of operation are not limited, i.e. 8760 hours/year.

[Rule 62-4.160(2), F.A.C.]

EMISSIONS STANDARDS

A.3. Maximum Allowable Emissions Rates: The permitted maximum allowable emissions rates for each pollutant are as follows:

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 application on April 6, 2004.
Total HAPs	23.0 tons/year	62-4.160(2), F.A.C. and emissions cap requested by application on April 6, 2004.

*Note: Limits established to escape Title V classification.

REPORTING AND RECORDKEEPING REQUIREMENTS

A.4. <u>Record Keeping</u>: Compliance shall be determined by recording the following data for each material used at the facility that contains HAPs and VOCs.

Materials Usage	
Usage = Monthly usage of each VOC & HAP containing materials	
Emissions Factor	
Density of Materials (Manufacturer specification's data shall be maintained)	• % of VOC content (by weight) • % of HAP content (by weight)
Emissions	
• Monthly Total VOCs emissions in tons • Monthly Individual HAP emissions in tons • Monthly Total HAPs emissions in tons	• Total cumulative Total VOCs emissions for 12-consecutive month • Total cumulative Individual HAP emissions for 12- consecutive month • Total cumulative Total HAPs emissions for 12-consecutive month

[Rule 62-210.370 (1), F.A.C.]

A.5. <u>Record Retention</u>: The owner or operator shall retain a copy of all records used to compute emissions for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370 (2)(h), F.A.C.]

This section of the permit addresses the following emissions unit(s):

Emissions Unit	Emissions Point Description
005 – Abrasive Blasting Operation	001 – Abrasive Blasting Booth Dust Collector
006 – Plasma Metal Cutting Operation	001 – Messer Dust Collector

PERFORMANCE RESTRICTIONS

B.1. Hours of Operation: The hours of operation are not limited, i.e. 8760 hours/year.

[Rule 62-4.160(2), F.A.C.]

WORK PRACTICE STANDARDS

B.2. Control Unit. The emissions from the metal cutting and abrasive 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(s) during normal operation [including start-up, shutdown, and whenever smoke and/or dust are generated from the operation(s)]. If there is a malfunction on the control unit(s), the owner or operator shall shut down the process operation(s) and the baghouse fan(s) 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]

RECORDKEEPING

B.3. Baghouse Malfunction/Maintenance Record. The owner or operator shall maintain the malfunction and maintenance records of the baghouses. The records shall be kept on site for at least 3 years, and shall include but not be limited to the following information :

a. Date and type of malfunctions which occurred.

b. Duration of the malfunction and corrective action taken.

c. Maintenance conducted on the baghouses.

[Rule 62-4.070 (2), and 62-4.160, F.A.C.]