

FINAL DETERMINATION

FOR

International Ship Repair & Marine Services, Inc. (ISR)

Hillsborough County

Construction Permit and Title V Operating Permit

Application Number

0570021-013-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

May 3, 2012

The Environmental Protection Commission of Hillsborough County mailed a public notice package on March 21, 2012 that included the Intent to Issue Air Construction Permit No. 0570021-013-AC to International Ship Repair and Marine Services, Inc. (ISR) located at 1616 Penny Street, Tampa, FL 33605. This construction permit authorizes the facility to install a replacement baghouse at the blasting booth. The baghouse will be a 30,000 ACFM transportable cartridge dust collector (Model 64-HF-43SE2), manufactured by Industrial Vacuum Equipment Corporation. The booth is subject to the 0.03 gr/dscf baghouse exhaust limit and 5% opacity limit pursuant to Rule 62-296.712(2), F.A.C. Since the grit usage in the booth is part of the existing Title V Permit No. 0570021-012-AV permitted throughput limits, and the worse-case scenario that all blasting occurs on the ships outside the booths was used, there will be no increase in overall facility-wide emission limits.

The Public Notice of Intent to Issue was published on April 18, 2012 in the Tampa Bay Times.

No comments were received from the public since it was published.

On April 13, 2012, Omana Taylor, P.E., the consultant for ISR, sent an e-mail to EPC staff and requested an administrative change to the process description of the Draft permit, in which the statement of “Metal parts will be blasted within the booth using **diesel compressors** and blasting nozzles” shall be changed to “Metal parts will be blasted within the booth using **electric compressors** and blasting nozzles”. The change has been made and reflected in this Final permit.

The final action of the Environmental Protection Commission of Hillsborough County is to issue the final permit.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

George Lorton
International Ship Repair and Marine Services, Inc.
1616 Penny Street
Tampa, FL 33605

Re: Hillsborough County - AP

Dear Mr. Lorton:

Enclosed is Air Construction Permit Number 0570021-013-AC, issued pursuant to Section 403.087, Florida Statutes, for the installation of a replacement baghouse at the blasting booth in the main yard of your facility.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Dr, Tampa, FL 33619; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/KRZ/krz

cc: Omana Antony Taylor, P.E. - Environmental Technologies Group, Inc. (via e-mail)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

Clerk Stamp

FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

clerk

Date

PERMITTEE:
George Lorton
International Ship Repair and Marine Services, Inc.
1616 Penny Street
Tampa, FL 33605

PERMIT/CERTIFICATION
Permit No.: 0570021-013-AC
County: Hillsborough
Expiration Date: September 21, 2013
Project: Modification – Main Yard
Blasting Booth

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. 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 EPC and made a part hereof and specifically described as follows:

This permit is for the modification of the blasting booth in the main yard. The current baghouse (4,300 acfm, Donaldson Torit, Model Downflo Oval) will be replaced with a 30,000 ACFM cartridge dust collector (Model 64-HF-43SE2), manufactured by Industrial Vacuum Equipment Corporation.

International Ship Repair & Marine Services, Inc. (ISR) performs operations that include the blasting and coating of marine vessels. ISR's operations include the main yard at 1616 Penny Street in Tampa, Metro Port (Berth 263, 264 and 265) and Berths 200 and 206 at Hooker's Point. There are two blasting booths involved in the operation. One booth is located in the main yard and the other booth is located at Berth 200.

The abrasive material used for blasting is coal slag which is stored on-site in storage silos that are pneumatically loaded. The blasting equipment includes blasting pots and a maximum of 16 blasting nozzles. Both external and internal blasting of ships occurs at the facility. Compressed air for propelling the abrasive grit is provided by up to eight diesel compressors. Steel shot is also an approved blasting media.

The blasting booth located in the main yard is currently permitted under EU 004 - Interior Blasting and Miscellaneous Metal Blasting, which is utilized as part of the shipbuilding and ship repair operations currently authorized at this facility. The booth measures approximately 27.5' W x 12.5' H x 50' L and is closed on all sides except the front side. The front side has curtain/tarp that is capable of being open and closed as needed to move metal parts in or out of the booth. The curtain/tarp will be required to remain closed during any blasting or coating activities to control

airborne emissions. Metal parts will be blasted within the booth using electric compressors and blasting nozzles. Particulate matter emissions from the blasting operation will be controlled by the building enclosure and vented to the new baghouse on the back side of the booth. During coating operations, spray nozzles are used to apply coatings to the metal parts and the baghouse can remain off but the curtain/tarp must remain closed to prevent overspray.

Since the grit usages in the booths are part of the existing permitted throughput limits, and the worse-case scenario that all blasting occurs on the ships outside the booths were used, there is no increase in overall facility-wide emission limits. The total facility-wide potential emissions will remain as currently limited to 146.5 tons per year for PM. The booth is subject to the 0.03 gr/dscf baghouse exhaust limit and 5% opacity limit from PM RACT, Rule 62-296.712(2), F.A.C. Initial visible emissions tests are required on the booth opening and baghouse exhaust upon initial blasting operations, and annual testing thereafter.

Location: 1616 Penny Street, Tampa

UTM: 17-358.03 E and 3092.75 N

NEDS NO: 0570021

EU ID No.: 004 - Interior Blasting and Miscellaneous Metal Blasting

References Permit No.: 0570021-012-AV

PERMITTEE:

International Ship Repair and Marine Services, Inc.

PERMIT CERTIFICATION NO. 0570021-013-AC

PROJECT: Modification – Main Yard Blasting Booth

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]
5. As requested by the permittee, in order to limit the facility-wide potential-to-emit (PTE), the maximum particulate matter (PM) emissions from the grit blasting operations shall not exceed 147 tons (including diesel compressor emissions) during any 12 consecutive month period. [Rule 62-212.300(1)(d), F.A.C. and Construction Permit Application Received November 28, 2011]
6. The following facility-wide operating and usage restrictions shall apply: [Rules 62-4.070(3), 62-212.300(1)(d), F.A.C. and Construction Permit Application Received November 28, 2011]
 - A) No more than 35,055 tons of abrasive grit shall be used in any 12 month period.
 - B) No more than 294,366 gallons diesel fuel shall be used in any 12 month period. Sulfur content of the fuel shall not exceed 0.05 percent by weight.
 - C) All dust laden air which is displaced in the silo loading process shall be filtered before being discharged to the ambient air.
 - D) All miscellaneous metal parts to be blasted separate from the dry docks shall be placed within the blasting/coating booth whenever practical.
 - E) Only diesel fuel, no used or waste oils, shall be burned in the diesel compressors.
7. The permittee shall not cause, permit, or allow emissions of particulate matter in excess of 0.03 gr/dscf from the baghouse that controls the blasting operation in the blasting/coating booth. [Rule 62-296.712(2), F.A.C. and Construction Permit Application Received November 28, 2011]
8. The permittee shall not cause, permit, or allow visible emissions greater than 5 percent opacity from any opening in the blasting/coating booth, or the exhaust from the baghouse controlling the

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International Ship Repair and Marine Services, Inc.

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PROJECT: Modification – Main Yard Blasting Booth

SPECIFIC CONDITIONS:

blasting/coating booth. [Rule 62-296.712(2), F.A.C. and Construction Permit Application Received November 28, 2011]

9. The permittee shall perform visible emissions tests for opacity within 60 days following the initial operation of the blasting booth after installation of the new baghouse on the following two emission points: 1) the exhaust of the baghouse controlling the blasting booth operations, and 2) the front side of the blasting booth (tarp enclosure). Visible emission tests shall be conducted annually thereafter. Particulate matter testing may be required if the EPC has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that the applicable standard is being violated. [Rules 62-297.310(7)(a)4., 62-297.310(7)(b), 62-297.620(4), and 62-4.070(3), F.A.C.]

10. The permittee shall submit two copies of test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County office within forty-five days of completing testing. The visible emission tests shall include testing at the point of highest observed opacity. Testing procedures shall be consistent with the requirements of Rule 62-297, F.A.C. [Rule 62-297.310(7)(a)4. and 62-4.070(3), F.A.C.]

11. Compliance with the emission limitations of Specific Condition Nos. 7 and 8 shall be determined using EPA Methods 1, 2, 4, 5 and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. All EPA Method 9 observation periods shall be at least thirty (30) minutes in duration. The observation point for each blasting operation test shall be at the point of maximum opacity leaving the baghouse and the blasting/coating booth. The minimum requirements for stack sampling facilities, source sampling, and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-296.320(4)(b)4. and 62-4.070(3), F.A.C.]

12. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

13. Compliance testing will be conducted to establish the maximum number of nozzles that can successfully operate in the blasting booth at any given time. The blasting booth will be limited to the number of nozzles used during the most recent compliance visible emissions test. Failure to submit the input rates and actual operating conditions, including the number of nozzles that operated, may invalidate the test. Ambient wind speed and direction shall be reported with the test. [Rules 62-4.070(3) and 62-297.310(2), F.A.C.]

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International Ship Repair and Marine Services, Inc.

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PROJECT: Modification – Main Yard Blasting Booth

SPECIFIC CONDITIONS:

14. In order to ensure compliance with the permit restrictions and emission limitations of Specific Condition Nos. 7 and 8, the permittee shall maintain the following records: [Rule 62-4.070(3), F.A.C.]

- A) Day, Month, Year
- B) Amount and type of abrasive blasting material used
- C) Monthly and 12-month rolling totals of abrasive blasting material
- D) Number of blasting nozzles used per blasting operation at the blasting/coating booth
- E) Monthly and 12-month rolling totals of amount of diesel fuel used
- F) Sulfur content of the diesel fuel

15. The permittee shall operate and maintain a measuring device to determine the air pressure differential across the baghouse(s) within 10 percent accuracy. [Rule 62-4.070(3), F.A.C.]

16. The following reasonable precautions shall be taken to control the emissions of unconfined particulate matter associated with the abrasive blasting and to ensure compliance with Specific Condition Nos. 7 and 8:

- A) Using only coal slag or steel shot for abrasive blasting materials within the booth unless prior approval is received from the Environmental Protection Commission of Hillsborough County to use another material.
- B) Using no spent abrasive material, except for steel shot used within a closed blasting system.
- C) The curtain/tarp on the front side of the booth shall be closed during any active blasting operation in order to help prevent excess emissions from exiting the booth.
- D) The curtain/tarp on the front side of the booth must have at least a 95% shade factor.
- E) The exhaust system (baghouse) for the blasting operation shall be in operation at all times during active blasting of parts in the booth.
- F) Requiring that all blasting operators be trained on procedures which minimize airborne emissions of blasting materials and instructed on the designed operation of the blasting booth and its control system. Records of training (when it was offered and who attended) shall be maintained and be made available for inspectors of the Environmental Protection Commission of Hillsborough County upon request.
- G) Using only manual sweeping and vacuum systems to clean-up spent blasting materials. No blowers are permitted.
- H) All miscellaneous metal parts to be blasted separate from the dry docks shall be placed within the blasting/coating booth whenever practical.
- I) A daily visible emission check of the building and baghouse exhaust stack shall be conducted and recorded during active blasting operations on any date that blasting occurs in the booth. If any emissions are observed, the permittee shall immediately conduct a 12-

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International Ship Repair and Marine Services, Inc.

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PROJECT: Modification – Main Yard Blasting Booth

SPECIFIC CONDITIONS:

minute visible emission observation during active blasting using EPA Method 9 contained in 40 CFR 60, Appendix A to ensure compliance with the 5% opacity limit. If any emissions over 5% opacity are observed, the permittee shall initiate immediate corrective action to eliminate excessive visible emissions.

[Rules 62-296.320(4)(c)2. and 62-4.070(3), F.A.C.; Construction Permit Application Received November 28, 2011]

17. In order to provide reasonable assurance that the pollution control equipment are operated and maintained adequately, the permittee shall submit an Operation and Maintenance (O&M) Plan for the baghouse with the Title V permit revision application for incorporating this AC permit into the operating permit. [Rules 62-296.700 and 62-4.070(3), F.A.C.]

18. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable requirement or permit condition is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. For the purpose of confirming compliance with the emission limitations in this permit, the EPC may require the use of EPA Method 5, EPA Method 9, or other approved methods, as deemed necessary.

[Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

19. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment* or major component of such equipment.

B) Installation or addition of any equipment* which is a source of air pollution.

*Not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit.

20. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

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International Ship Repair and Marine PROJECT: Modification – Main Yard Blasting Booth
Services, Inc.

SPECIFIC CONDITIONS:

21. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited.

[Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.]

22. A minimum of two copies of an application for a Title V permit revision shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the initial compliance testing or at least 90 days prior to the expiration date of this permit, whichever occurs first. The application shall include an Operation & Maintenance Plan for the new baghouse. [Rules 62-4, 62-210, 62-296.700, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

