Appendix CP-2

Visible Emissions Compliance Plan

International Ship Repair & Marine Services, Inc. (ISR)
Title V Air Operation Revision Permit No. 0570021-014-AV

International Ship Repair and Marine Services, Inc., is a marine ship repair facility located at 1616 Penny Street, Tampa. The activities at this facility include the blasting and coating of marine vessels. The facility not only operates out of its main yard, but also performs ship maintenance out of other berths (Berths 200 and 206). The blasting of the internal sections of the ship are conducted either inside the ship with a control device or in a blasting booth enclosed by permanent walls and a tarp enclosure, which help contain the dust generated from the blasting of miscellaneous metal parts. Two (2) blasting booths are used for the blasting of small miscellaneous parts.

During the review of the shipyard operations, as part of the Title V renewal process, it was determined that the abrasive blasting of miscellaneous metal parts in the blasting containment area are subject to the 5% opacity standard of Rule 62-296.712(2), F.A.C. As a result, the facility has to comply with a 5% opacity standard for the blasting booths and storage silo, as specified in the Title V Renewal Permit No. 0570021-012-AV, Specific Condition No. B.5.

ISR submitted an AC application for the blasting booth in the main yard (Berth 206) and obtained Permit No. 0570021-013-AC, which authorized the installation of a replacement baghouse. ISR conducted an initial VE test, which demonstrated compliance with the 5% opacity standard. However, the blasting booth at Berth 200 requires that an evaluation be made and possible corrective measures be taken prior to operation. As a result, this Compliance Plan (Appendix CP-2) is being attached to this Title V revision permit to allow ISR to make improvements to the blast booth at Berth 200 in order to comply with the 5% opacity limit. Therefore, prior to operating the blasting booth at Berth 200, ISR shall conduct the following compliance measures:

1. The facility shall evaluate the blast booth at Berth 200 and determine the corrective measures that will help improve the blast booth, in order to comply with the 5% opacity limit.
2. The facility shall submit a report to the EPC detailing the findings and corrective measures for EPC approval prior to implementing these measures.
3. If a construction permit is necessary, then the facility shall submit a construction permit application.
4. Perform and complete improvements to the blast booths as part of the corrective measures approved by the EPC.
5. Completion of VE testing on the blast booth in order to demonstrate compliance with the 5% opacity limit.
6. Submittal of VE test demonstrating compliance with the 5% opacity limit.