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Executive Director
Richard D. Garrity, Ph.D.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

Mr. John Buntin, President
Advantage Steel, Inc.
5105 24th Avenue South
Tampa, Florida 33619

Permit No.: 0570328-006-AO
County: Hillsborough

Enclosed is the revised Permit Number 0570328-006-AO for the surface coating of miscellaneous metal parts and products, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of receipt of this permit. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication.

An agency with values of environmental stewardship, integrity, honesty, and a culture of fairness and cooperation.

www.epchc.org

E-Mail: epcinfo@epchc.org

AN AFFIRMATIVE ACTION – EQUAL OPPORTUNITY EMPLOYER

A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;

(b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;

(c) A statement of how and when the petitioner received notice of the EPC action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

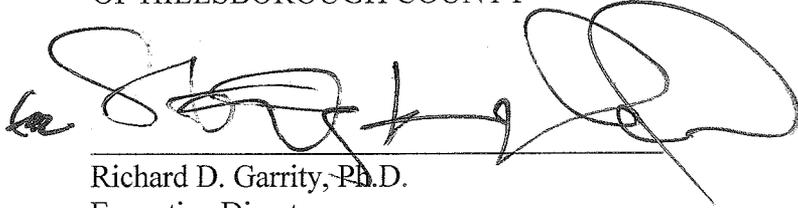
Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision.

Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

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 EPC's Legal Office at 3629 Queen Palm Dr, Tampa, Florida 33619 and 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY



Richard D. Garrity, Ph.D.
Executive Director

cc: E. J. LeBoss, Air Observations, Inc. (e-mail)
Florida Department of Environmental Protection, Southwest District (e-mail)

COMMISSION

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Chairman
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Executive Director
Richard D. Garrity, Ph.D.

PERMITTEE:

Advantage Steel, Inc.
5101 24th Avenue South
Tampa, Florida 33619

PERMIT/CERTIFICATION

Permit No.: 0570328-006-AO
Expiration Date: January 13, 2017
County: Hillsborough
Project: Miscellaneous Metal Parts
Surface Coating

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 authorizes the operation of a miscellaneous metal parts forming, cleaning, and coating operation. The operation consists of bending and shaping metal components and fixtures; cutting, welding and drilling of metal pieces as necessary; cleaning of metal in an enclosed Wheelabrator steel shot blasting station as necessary; and spray painting of metal components in open and partially enclosed areas.

Spray painting is done with either an airless or conventional spray gun inside of the partially enclosed steel structure. Overspray from the spray painting is controlled by use of reasonable precautions (i.e. maintenance of perimeter vegetation, tarps, etc.) as necessary. The facility is subject to VOC RACT and only coatings containing 3.5 lbs/gals or less of volatile organic compounds shall be used. Mineral spirits is the primary solvent used for cleaning purposes. All usages of coatings and solvents are required to be recorded and maintained to demonstrate compliance with limiting standards.

The enclosed Wheelabrator blasting booth utilizes steel shot to prepare the metal pieces for spray coating, as needed. It is also located inside the main process building where fabrication and coating operations are conducted. Particulate matter emissions from the blasting booth are vented to an integrated baghouse which is located in an enclosed adjacent structure; the baghouse exhaust inside the enclosure. Due to its low potential to emit particulate matter, the operation of the Wheelabrator has been determined to be an exempt source of particulate matter emissions pursuant to Rule 62-210.300(3)(b)1., F.A.C.

Advantage Steel, Inc.
Tampa, Florida

Permit No.: 0570328-006-AO
Project: Miscellaneous Metal Parts Surface Coating

Facility Information Summary

Location: 5101 24th Avenue South, Hillsborough County

Facility UTM Coordinates: 17-362.0 E 3089.0 N

Latitude: 27° 55' 37" N **Longitude:** 82° 23' 55" W

Facility ID No.: 0570328

Emission Unit ID No.: 001 – Spray Painting Operations

SPECIFIC CONDITIONS:

1. **General Conditions.** A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. **Applicable Requirements.** 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.]
3. **Rules of the EPC.** 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.]

EU 001: Surface Coating Operations

4. **VOC/HAP Emission Limitations.** As requested by the permittee, in order to limit the potential to emit and establish the facility as a synthetic minor for both Volatile Organic Compound (VOCs) and Hazardous Air Pollutants (HAP), the following emission limitations shall apply:
 - A) VOC emissions from the surface coating operations shall not exceed 9.9 tons per any 12 consecutive month period;
 - B) HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month periods for any individual HAP, and less than 25 tons in any 12 consecutive month periods for the total of all HAPs combined.

[Rules 62-210.200 (PTE), 62-4.070(3), F.A.C. and Air Construction Permit AC29-1505]

5. **VOC Content Limitation.** The volatile organic compounds shall not exceed 3.5 pounds per gallon mixture of coatings, binders, and thinners, excluding water, delivered to a coating applicator. [Rule 62-296.513(2)(a)2., F.A.C.]
6. **Solvent Washings.** The volatile organic compound emissions from solvent washings shall be considered in the emission limitation of Specific Condition No. 4, unless the solvent is directed into containers that prevent evaporation into the atmosphere. [Rule 62-296.513(2)(c), F.A.C.]
7. **VOC/HAP Compliance Method.** Compliance with the emission limitation of Specific Condition No. 5 shall be determined using EPA Method 24 contained in 40 CFR 60, EPA VOC DATA SHEET or manufacturer's certification consistent with EPA's document number 450/3-84-019 titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings", shall be kept on-site for each coating applied and made available upon request to the Environmental Protection Commission of Hillsborough County. [Rule 62-299.500(2)(b)4., F.A.C.]
8. **VOC/HAP Coating and Work Practice Limitations.** In order to ensure compliance with Specific Condition Nos. 4, the following restrictions and limitations shall apply:

SPECIFIC CONDITIONS:

- A) The amount of coating(s), as applied, may not exceed 5,652 gallons per any 12 consecutive month period;
- B) The spray coating operation shall be performed only in designated spray coating areas over an impervious layer to prevent paint overspray and solvents from entering the soil and contaminating the ground water;
- C) Material safety data sheet for each coating and solvent shall be maintained on site and made available upon request to any local, state, or federal air pollution agency;
- D) Utilize best management practices to control paint overspray including, but not limited to, use of tarps, maintenance of perimeter vegetation, minimization of spray painting during high winds, and spraying with the nozzle directed downward as much as practical;
- E) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, or in active use;
- F) Immediately attend to all spills/waste as appropriate.
- G) The permittee shall collect on a regular basis and dispose of or recycle the soiled cleaning rags/papers or tarps used to collect the overspray paint in an acceptable manner.
- H) The permittee is prohibited from using a cleaning solvent containing any hazardous air pollutant as defined by Rule 62-210.200 – “Hazardous Air Pollutant”, F.A.C.
- I) All empty paint drums may be cleaned and air dried. The unusable paint and drum washings will be collected and disposed of by a licensed hazardous waste agent.

[Rules 62-4.070(3), 62-210.200 – “Potential to Emit”, and 62-296.320, F.A.C.]

Facility-wide Limitations

9. Nuisance Prohibition. The use of property, facilities, equipment, processes, products, or compounds, or any other act, specifically, unconfined paint overspray, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

10. Control of Unconfined Particulate Matter. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation or materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. [Rule 62-296.320(4)(c)1., F.A.C.]

11. Hours of Operation. Operating hours for this facility are not limited. Therefore, this facility is permitted to operate continuously; 8,760 hours per consecutive 12 month period. [Rule 62-210.200 (Potential to Emit), F.A.C.]

SPECIFIC CONDITIONS:

12. Visible Emissions (VE). Visible emissions from the process building and any other particulate matter emitting source not subject to an emission unit-specific limitation, shall not have opacity equal to or greater than 20 percent. [Rule 62-296.320(4)(b), F.A.C, and Chapter 1-3.52, Rules of the EPC]

13. Objectionable Odor. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62 210.200 (Definitions) and 62-296.320(2), F.A.C.]

14. Circumvention. The permittee shall not circumvent any air pollution control device, or allow the emissions of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

Recordkeeping and Reporting Requirements

15. Records. In order to demonstrate continuous compliance with Specific Condition Nos. 4 and 5, the permittee shall maintain daily records of all operations necessary to substantiate monthly coating(s) and solvent usage and abrasive blasting activity:

- A) Day, Month, and Year of the data recorded;
- B) Product name/number and VOC content (lb/gal) of the paint coatings, as applied, and for each clean-up solvent used;
- C) Monthly totals, in gallons, of each coating and clean-up solvent used, including any thinner or reducer added to the coating, if applicable;
- D) Monthly VOC, individual HAP species, and total combined HAP emissions for surface coating operations;
- E) Twelve (12) month rolling totals of items C) and D) of this specific condition;

[Rules 62-4.070(3), and 62-4.160(14)(b), F.A.C.]

16. Records Retention. These records shall be maintained onsite and made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request and kept on file for at least three years from the date of measurement. The records shall include, but not limited to, the following: [Rules 62-4.070(3), and 62-4.160(14)(b), F.A.C.]

17. Annual Reporting. The permittee shall submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]

SPECIFIC CONDITIONS:

Permit Applications and Transfers

18. Transfer of Ownership. 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.]

19. Permit Revision. The permittee shall apply for a timely revision of this permit, if affected by the promulgation of any federal NESHAP applicable to this facility. [Rule 62-4.070(3), F.A.C.]

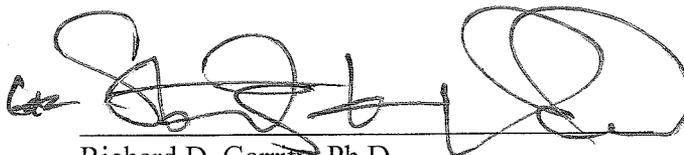
20. Modifications. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal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

- 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.

Note: Items A and B are not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit. [Rules 62-210.300 and 62-4.070(3), F.A.C.]

21. Operation Permit Renewal. Prior to 60 days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form and submit the most recent 3 months of records required by this permit. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rules 62-4.090, F.A.C. and 62-4.070(3), F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY



Richard D. Garrity, Ph.D.
Executive Director

ATTACHMENT A - GENERAL CONDITIONS

(1) The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

(2) This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

(3) As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

(4) This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

(5) This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

(6) The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

(7) The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- (a) Have access to and copy any records that must be kept under conditions of the permit;
- (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.

ATTACHMENT A - GENERAL CONDITIONS

(8) If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- (a) A description of and cause of noncompliance; and
- (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is

expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

(9) In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

(10) The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

(11) This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

(12) This permit or a copy thereof shall be kept at the work site of the permitted activity.

(13) This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

(14) The permittee shall comply with the following:

- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

ATTACHMENT A - GENERAL CONDITIONS

- (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- (c) Records of monitoring information shall include:
1. The date, exact place, and time of sampling or measurements;
 2. The person responsible for performing the sampling or measurements;
 3. The dates analyses were performed;
 4. The person responsible for performing the analyses;
 5. The analytical techniques or methods used;
 6. The results of such analyses.

(15) When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.