



The facility will utilize tarps and other screening shields that must surround the entire area being blasted in order to control particulate matter (PM) emissions generated during the dry blasting operations. All blasting will be performed in accordance with the *EPC Shipyard Abrasive Blasting Best Management Practices*, which is already included as an attachment to the current permit. Also included as part of the dry blasting operations is the use of a small parts blasting enclosure that can be fabricated on the dock using appropriate screens, tarps, or enclosures that surround the area, including the top, where parts will be blasted. The enclosure will be used to blast and paint smaller miscellaneous parts as needed to support the ship building/repair operations.

The spent dry blast media is deposited on the dock surface where it will be removed by vacuuming and sweeping, along with other hand-held collection devices. The spent grit is prevented from washing into the canal by the slope of the dock in certain points that direct the water flow to drains that contain filters. In areas where the water may flow toward the canal, the facility will use booms or other barriers that act as filters to remove particulate as it passes through the barrier.

Due to the confusion that can result from multiple emission points with varying opacity limits from different operations being included under one emission unit, the various aspects of the abrasive blasting operations have been separated out into distinct emission units as part of this permit.

PM emissions were estimated using the emission factor for sand blasting defined in Table 13.2.6-1 from AP-42 for Abrasive Blasting, and assuming a 70% control efficiency for the use of tarps surrounding the blasting area. Sand was used to document worst-case potential emissions to cover the use of all requested blasting medias; however, the facility did not request that sand be included as an authorized media for use on site. Based on a maximum anticipated annual usage of 2,880 tons/yr for both internal and external blasting combined, the potential emissions from dry blasting is 22.4 tons/yr. The total potential emissions for all the Abrasive Blasting Operations (EU001, EU004-008), which includes both wet and dry blasting, pot loading, and compressor emissions, is 48.0 tons/yr.

The facility is currently permitted to perform coating operations on the completed vessels, along with small metal and plastic component parts. The facility is also authorized to repair fiberglass marine vessels and manufacture reinforced composite plastic parts. Since this construction permit only addresses blasting operations, these portions of the facility's processes are not affected by this permit and are therefore not referenced within the conditions of this permit.

Based on our review, we recommend issuance of the permit referenced above.

TECHNICAL EVALUATION

&

PRELIMINARY DETERMINATION

for

RiverHawk Marine, LLC

Air Construction Permit

Application Number

0571417-003-AC

Environmental Protection Commission of

Hillsborough County

Tampa, Florida

May 4, 2012

## **I. Project Description**

### **Applicant:**

Stephen Wheelock  
CEO  
RiverHawk Marine, LLC  
5251 West Tyson Avenue  
Tampa, Florida 33611

### **Engineer:**

Tom T. John, P.E.  
Registration No. 33157  
Tom John, P.E., Inc.  
6250 Cape Hatteras Way #2  
St. Petersburg, FL 33702

### **Project and Location:**

This project is to authorize the addition of dry abrasive blasting on ship exteriors and associated miscellaneous parts at the ship building and marine vessel repair facility. The project has been assigned the following NEDS Source Classification Codes (SCCs):

3-09-002-01 (Abrasive Blasting of Metal Parts: General)  
2-02-001-02 (Internal Combustion Engines: Distillate Oil)

The primary business at this facility is identified by the Standard Industrial Classification (SIC) for – 3731, Ship building & repairing (NAICS 336611) and 3732, Boat building & repairing (NAICS 336612).

The project is located at 5251 West Tyson Avenue, Tampa, Hillsborough County, Florida; at longitude 82° 32' 12" W, latitude 27° 53' 19" N.

### **Process and Controls:**

RiverHawk Marine, LLC is a ship building and repair facility that currently uses various blasting techniques in order to prepare the interior and exterior ship surfaces for refurbishment and repainting. This facility also builds steel deck structures and interior components for marine vessels, then completes the electrical work, plumbing and assembles the boat with a fiberglass hull purchased from an outside vendor. The completed vessel is then spray painted with primer and finish coatings. In the application, the facility requested that the permit not include any limits on the annual material throughput or usages so that they can maintain operational flexibility to meet the need of their customers. They suggest calculating emissions on a monthly basis using

approved emission factors for abrasive blasting operations to demonstrate compliance with an annual emission limit on their potential to emit (PTE) for particulate matter (PM).

RiverHawk Marine is currently authorized to perform wet abrasive blasting or hydro-blasting to clean the exterior ship hull and deck, and dry abrasive blasting for interior surfaces only. Since hydro-blasting uses only pressurized water spray, the level of PM emitted is insignificant. The associated blasting operations use one 8-ton blasting pot with a portable diesel-powered air compressor for wet and dry abrasive grit blasting. The blasting pot is top-loaded with blast media from small 40-50 lb bags for smaller jobs and from 3,000 lb super-sacks for larger jobs. PM emissions from pot loading are controlled by lowering the loading spout from the sacks into the blasting pot and the use of filter socks as needed to meet the opacity requirements. The pot is capable of operating 2 blast nozzles at one time.

Internal dry blasting is controlled by a dust sock filter. A hole is cut into the ship hull and an air horn is attached to induce a draft within the ship interior. The spent grit blast media is collected in a dust sock attached to plastic ductwork downstream of the air horn. When the dust sock is full, it is replaced and the spent blast media is disposed of by a licensed waste hauler. The wet blasting technique uses abrasive grit blasting media that is controlled by a water curtain generated at the blast nozzle. According to the Background Information Document (BID) to AP-42 Chapter 13.2.6, the water curtain provides 80% control efficiency for PM emissions.

As a result of potential increase in demand, and to address specific requests for dry blasting of ship exteriors (including Coast Guard ships), the facility submitted an application to add dry abrasive blasting as an additional option for the preparation of ships for coating as part of their ship construction and repair operations. Ships will be removed from the water and placed in cradles on the dock or in the building, depending on the ship's size. In addition to currently permitted wet blasting, the facility will perform dry blasting using a variety of media including black beauty (coal slag), metallic grit (e.g. nickel, copper, etc.), minerals (e.g. garnet), and glass beads (new or recycled). The dry blasting will be powered by up to two blast pots, each powered by a diesel-fired compressor, and utilize a maximum of 4 blasting nozzles per pot at one time. The blasting equipment will typically be brought on-site as needed by contractors performing the dry blasting. The dry blasting equipment is in addition to the existing compressor, pot, and two nozzles from the current permit, which will remain on-site for use as needed. Two ships is the estimated maximum number that could be processed at one time on the pad north of the building. Due to safety and space considerations, a maximum of 4 external dry blasting nozzles and 4 internal dry blasting nozzles are permitting to be in operation simultaneously at any time.

The facility will utilize tarps and other screening shields that must surround the entire area being blasted in order to control PM emissions generated during the dry blasting operations. All blasting will be performed in accordance with the *EPC Shipyard*

*Abrasive Blasting Best Management Practices*, which is already included as an attachment to the current permit. Also included as part of the dry blasting operations is the use of a small parts blasting enclosure that can be fabricated on the dock using appropriate screens, tarps, or enclosures that surround the area, including the top, where parts will be blasted. The enclosure will be used to blast and paint smaller miscellaneous parts as needed to support the ship building/repair operations.

The spent dry blast media is deposited on the dock surface where it will be removed by vacuuming and sweeping, along with other hand-held collection devices. The spent grit is prevented from washing into the canal by the slope of the dock in certain points that direct the water flow to drains that contain filters. In areas where the water may flow toward the canal, the facility will use booms or other barriers that act as filters to remove particulate as it passes through the barrier.

Due to the confusion that can result from multiple emission points with varying opacity limits from different operations being included under one emission unit, the various aspects of the abrasive blasting operations have been separated out into distinct emission units as part of this permit. The Abrasive Blasting Operations are now described as follows:

Emission Unit ID Nos.:   001 – Wet Blasting Operations  
                                  004 – External Ship Dry Blasting  
                                  005 – Internal Ship Dry Blasting  
                                  006 – Small Parts Blasting Enclosure (Dry Abrasive Blasting)  
                                  007 – Blast Pot Loading  
                                  008 – Diesel Powered Air Compressors

PM emissions were estimated using the emission factor for sand blasting defined in Table 13.2.6-1 from AP-42 for Abrasive Blasting, and assuming a 70% control efficiency for the use of tarps surrounding the blasting area. Sand was used to document worst-case potential emissions to cover the use of all requested blasting medias; however, the facility did not request that sand be included as an authorized media for use on site. Based on a maximum anticipated annual usage of 2,880 tons/yr for both internal and external blasting combined, the potential emissions from dry blasting is 22.4 tons/yr. The total potential emissions for all the Abrasive Blasting Operations (EU001, EU004-008), which includes both wet and dry blasting, pot loading, and compressor emissions, is 48.0 tons/yr.

The dry abrasive blasting within the interior of ships and within the small parts blasting enclosure is subject to the 5% opacity standard from PM-RACT pursuant to Rule 62-296.712, F.A.C. Since the wet and dry abrasive blasting of the exterior of ships cannot reasonably be enclosed and the PM emissions vented to a control device, external blasting is subject to a 20% opacity standard, along with the diesel compressors. Finally, the blasting pot loading operations are exempt from PM-RACT pursuant to Rule 62-

296.700(2)(c), F.A.C. since the maximum PTE for PM from that activity is less than 1 ton/yr. Initial visible emission tests are required using dry abrasive blasting on the exterior of ships and within the small parts blasting enclosure. Annual tests are required thereafter.

The facility is currently permitted to perform coating operations on the completed vessels, along with small metal and plastic component parts. The facility is also authorized to repair fiberglass marine vessels and manufacture reinforced composite plastic parts. Since this construction permit only addresses blasting operations, these portions of the facility's processes are not affected by this permit and are therefore not referenced within the conditions of this permit.

**Application Information:**

Received on: March 16, 2012

Request for Additional Information:

Application Complete: March 16, 2012

## **II. Rule Applicability**

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is subject to the requirements of Rule 62-212.300, General Preconstruction Review Requirements, F.A.C., since the project is not exempt from the permit requirements in Rule 62-210.300, F.A.C.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C., since the facility is a minor source for PSD.

This project is not subject to the requirements Rule 62-212.500, Preconstruction Review for Nonattainment Areas, F.A.C., since the facility is a minor source and is not located in a designated nonattainment area.

This project is not subject to the requirements Rule 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C., since the facility is a Synthetic Non-Title V Source.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the project is a source of particulate matter and a potential source of odors.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.480, Specific Emission Limiting and Performance Standards, F.A.C., since there is not an applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology (RACT) - Requirements for Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities, F.A.C., since this project is specifically for the blasting operations and does not address their surface coating operations.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology - Lead, F.A.C., since there is not an applicable source specific category in this rule.

This project is subject to the requirements of Rule 62-296.700, Particulate Matter Reasonably Available Control Technology, F.A.C., since it is located in an air quality maintenance area and subject to PM RACT, pursuant to Rule 62-296.712, F.A.C.

This project is not subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since the facility is a minor source of HAP emissions.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapters 1-1.07, Paragraph 2 and 1-3.52, Paragraph 2, Rules of the Environmental Protection Commission of Hillsborough County.

### III. Summary of Emissions

Emission Unit (EU)	Regulated Parameter	Actual Emissions (tons/yr) <sup>a</sup>	Potential Emissions (tons/yr) <sup>b</sup>	Allowable Limits <sup>c</sup>
001 – Wet Blasting Operations	PM <sup>d</sup>	0	23.9	
	VE		-	20% Opacity
004 – External Ship Dry Blasting	PM <sup>d</sup>	0	14.9	
	VE		-	20% Opacity
005 – Internal Ship Dry Blasting	PM <sup>d</sup>	0.001	3.1	
	VE		-	5% Opacity
006 – Small Parts Blasting Enclosure (Dry Abrasive Blasting)	PM <sup>d</sup>	0	3.7	
	VE		-	5% Opacity
007 – Blast Pot Loading	PM <sup>d</sup>	0.001	0.6	
	VE		-	5% Opacity
008 – Diesel Powered Air Compressors	PM <sup>d</sup>	0.001	1.7	
	VE		-	20% Opacity <sup>c</sup>
TOTAL			48.0	

- Actual emissions are estimated based on the average of emissions reported in the 2010 and 2011 Annual Operating Reports. EU005, EU007, and EU008 we based on data from EU001, which formerly encompassed all blasting operations as a single unit.
- The potential to emit for PM is based on estimated maximum throughputs of 2,880 ton/yr and 4,433 tons/yr for dry blasting and wet blasting, respectively, and 1,000 hrs/yr and 8,760 hrs/yr for compressor operations during dry blasting and wet blasting operations, respectively. An estimated 20% of the dry blasting throughput total was assumed for external blasting of ships and parts. An estimated 80% of the total external blasting total throughput was assumed for ship exteriors, and the other 20% was assumed for miscellaneous parts blasted separate from the ship. The PM limit identified in the permit is only for total PM from all blasting operations combined.
- Abrasive blasting operations on the exterior of ships are subject to a 20% opacity standard, along with the diesel compressors. The dry abrasive blasting within the interior of ships and within the small parts blasting enclosure is subject to the 5% opacity standard pursuant to Rule 62-296.712, F.A.C., PM RACT for Miscellaneous Manufacturing Process Operations.
- PM emissions were calculated using the Total PM emission factor for sand (5 mph wind speed) from Table 13.2.6-1, AP-42, Compilation of Air Pollutant Emission Factors, Fifth Edition (27 lb PM/ 1000 lb abrasive) and applying a control efficiency equal to 70 percent for the use of tarps surrounding the blasting area during dry abrasive blasting and 80 percent for the water curtain during wet abrasive blasting.

### IV. Conclusions

The revisions proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Environmental Protection Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

**V. Proposed Agency Action**

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue an Air Construction Permit for a ship building and repair facility.

CERTIFIED MAIL

In the Matter of an  
Application for Permit by:

File No.: 0571417-003-AC  
County: Hillsborough

Mr. Stephen Wheelock, CEO  
RiverHawk Marine, LLC  
5251 West Tyson Avenue  
Tampa, FL 33611

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INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, RiverHawk Marine, LLC, applied on March 16, 2012 to the EPC for an air construction permit to authorize the addition of dry abrasive blasting on ship exteriors and associated miscellaneous parts at the ship building and marine vessel repair facility. Particulate matter emissions generated during the dry blasting operations will be controlled through the use of tarps and other screening shields that must surround the entire area being blasted. The facility is located a 5251 West Tyson Avenue, Tampa, Florida.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility.

The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4.

Pursuant to Section 403.815 and 403.0872, F.S. and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a

newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Drive, Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

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 Drive, 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 publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. 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. 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, 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 that the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; 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, F.A.C.

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 of intent. 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.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner,
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,
- (c) Each rule or portion of a rule from which a variance or waiver is requested,
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above,
- (e) The type of action requested,
- (f) The specific facts that would justify a variance or waiver for the petitioner,
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule), and

- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of the those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

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 Drive, 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

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Richard D. Garrity, Ph.D.  
Executive Director

cc: Florida Department of Environmental Protection (via e-mail)  
Tom T. John, P.E, Tom John, P.E., Inc. (via e-mail)

**CERTIFICATE OF SERVICE**

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on \_\_\_\_\_ to the listed persons.

**FILING AND ACKNOWLEDGEMENT**

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

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY  
NOTICE OF INTENT TO ISSUE PERMIT

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue an air pollution permit (Permit No. 0571417-003-AC) to RiverHawk Marine, LLC to authorize the addition of dry abrasive blasting on ship exteriors and associated miscellaneous parts at the ship building and marine vessel repair facility. Particulate matter emissions generated during the dry blasting operations will be controlled through the use of tarps and other screening shields that will surround the entire area being blasted. The Synthetic Non-Title V facility is located at 5251 West Tyson Avenue, Tampa, FL 33611.

A Best Available Control Technology (BACT) determination was not required.

The EPC will issue the Final permit with the conditions of the DRAFT permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for 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 Drive, 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 publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. 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. 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 agency determination;
- (c) A statement of how and when 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 proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; 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 of intent. 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 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 Drive, 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.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Drive, Tampa, Florida 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permit and require, if applicable, another Public Notice.

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

Mr. Stephen Wheelock, CEO  
RiverHawk Marine, LLC  
5251 West Tyson Avenue  
Tampa, FL 33611

Re: Hillsborough County – AP

Dear Mr. Wheelock:

Enclosed is Permit No. 05701417-003-AC to authorize the addition of dry abrasive blasting on ship exteriors and associated miscellaneous parts at the ship building and marine vessel repair facility, issued pursuant to Section 403.087, Florida Statutes.

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

cc: Florida Department of Environmental Protection (via e-mail)  
Tom T. John, P.E, Tom John, P.E., 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:**

RiverHawk Marine, LLC  
5251 West Tyson Avenue  
Tampa, Florida 33611

**PERMIT/CERTIFICATION**

**Permit No.:** 0571417-003-AC  
**County:** Hillsborough  
**Expiration Date:** August 1, 2013  
**Project:** Dry Abrasive Blasting

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and Chapter 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 Environmental Protection Commission (EPC) of Hillsborough County and made a part hereof and specifically described as follows:

This permit authorizes the addition of dry abrasive blasting on ship exteriors and associated miscellaneous parts. RiverHawk Marine, LLC is a ship building and repair facility that currently uses various blasting techniques in order to prepare the interior and exterior ship surfaces for refurbishment and repainting. This facility also builds steel deck structures and interior components for marine vessels, then completes the electrical work, plumbing and assembles the boat with a fiberglass hull purchased from an outside vendor. The completed vessel is then spray painted with primer and finish coatings.

RiverHawk Marine is currently authorized to perform wet abrasive blasting or hydro-blasting to clean the exterior ship hull and deck, and dry abrasive blasting for interior surfaces only. Since hydro-blasting uses only pressurized water spray, the level of PM emitted is insignificant. The current associated blasting operations use one 8-ton blasting pot with a portable diesel-powered air compressor for wet and dry abrasive grit blasting. The blasting pot is top-loaded with blast media from small 40-50 lb bags for smaller jobs and from 3,000 lb super-sacks for larger jobs. PM emissions from pot loading are controlled by lowering the loading spout from the sacks into the blasting pot and the use of filter socks as needed to meet the opacity requirements. The pot is capable of operating 2 blast nozzles at one time.

Internal dry blasting is controlled by a dust sock filter. A hole is cut into the ship hull and an air horn is attached to induce a draft within the ship interior. The spent grit blast media is collected in a dust sock attached to plastic ductwork downstream of the air horn. When the dust sock is full, it is replaced and the spent blast media is disposed of by a licensed waste hauler. The wet blasting technique uses abrasive grit blasting media that is controlled by a water curtain generated at the blast nozzle.

This project expands the use of dry abrasive blasting as an additional option for the preparation of ships for coating. Ships will be removed from the water and placed in cradles on the dock or in the building, depending on the ship's size. In addition to currently permitted wet blasting, the facility will perform dry blasting using a variety of media including black beauty (coal slag), metallic grit (e.g. nickel, copper, etc.), minerals (e.g. garnet), and glass beads (new or recycled). The dry blasting will be powered by up to two blast pots, each powered by a diesel-fired compressor, and utilize a maximum of 4 blasting nozzles per pot at one time. The blasting equipment will typically be brought on-site as needed by contractors performing the dry blasting. The dry blasting equipment is in addition to the existing compressor, pot, and two nozzles from the current permit, which will remain on-site for use as needed. Two ships is the estimated maximum number that could be processed at one time on the pad north of the building. Due to safety and space considerations, a maximum of 4 external dry blasting nozzles and 4 internal dry blasting nozzles are permitting to be in operation simultaneously at any time.

The facility will utilize tarps and other screening shields that must surround the entire area being blasted in order to control PM emissions generated during the dry blasting operations. All blasting will be performed in accordance with the *EPC Shipyard Abrasive Blasting Best Management Practices*. Also included as part of the dry blasting operations is the use of a small parts blasting enclosure that can be fabricated on the dock using appropriate screens, tarps, or enclosures that surround the area, including the top, where parts will be blasted. The enclosure will be used to blast and paint smaller miscellaneous parts as needed to support the ship building/repair operations.

The spent dry blast media is deposited on the dock surface where it will be removed by vacuuming and sweeping, along with other hand-held collection devices. The spent grit is prevented from washing into the canal by the slope of the dock in certain points that direct the water flow to drains that contain filters. In areas where the water may flow toward the canal, the facility will use booms or other barriers that act as filters to remove particulate as it passes through the barrier.

The dry abrasive blasting within the interior of ships and within the small parts blasting enclosure is subject to the 5% opacity standard from PM-RACT pursuant to Rule 62-296.712, F.A.C. Since the wet and dry abrasive blasting of the exterior of ships cannot reasonably be enclosed and the PM emissions vented to a control device, external blasting is subject to a 20% opacity standard, along with the diesel compressors. Finally, the blasting pot loading operations are exempt from PM-RACT pursuant to Rule 62-296.700(2)(c), F.A.C. since the maximum PTE for PM from that activity is less than 1 ton/yr. Initial visible emission test are required using dry abrasive blasting on the exterior of ships and within the small parts blasting enclosure. Annual tests are required thereafter.

Due to the confusion that can result from multiple emission points with varying opacity limits from different operations being included under one emission unit, the various aspects of the abrasive blasting operations have been separated out from a single emission unit as in the previous permit and into distinct emission units as part of this permit as summarized below.

The facility is currently permitted to perform coating operations on the completed vessels, along with small metal and plastic component parts. The facility is also authorized to repair fiberglass

marine vessels and manufacture reinforced composite plastic parts. Since this construction permit only addresses blasting operations, these portions of the facility's processes are not affected by this permit and are therefore not referenced within the conditions of this permit.

**Facility Information Summary**

**Location:** 5251 West Tyson Avenue, Tampa, Hillsborough County

**UTM Coordinates:** 17 - 348.7 East 3083.9 North

**Latitude:** 27° 53' 19" N      **Longitude:** 82° 32' 12" W

**Facility ID No.:** 0571417

**Emission Unit ID Nos.:** 001 – Wet Blasting Operations  
004 – External Ship Dry Blasting  
005 – Internal Ship Dry Blasting  
006 – Small Parts Blasting Enclosure (Dry Abrasive Blasting)  
007 – Blast Pot Loading  
008 – Diesel Powered Air Compressors

**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.]
- 4. Chapter 84-446, Laws of Florida.** The use of property, facilities, equipment, processes, products, or compounds, or any other act 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.

**Abrasive Blasting Operations (EU001 and EU004-EU008)**

- 5. PM Emission Limitations.** As requested by the permittee, in order to limit the potential to emit and establish the facility as a Synthetic Non-Title V Source for Particulate Matter, emissions from all abrasive blasting operations (EU001 and EU004-EU008 combined) shall not exceed 48.0 tons per any 12 consecutive month period. [Rules 62-4.070(3), 62-210.200 – “Potential to Emit”, 62-296.320 F.A.C., Construction Permit No. 0571417-001-AC; and Construction Permit Application received on March 16, 2012]
- 6. Visible Emissions (VE).** Visible emissions from abrasive blasting operations shall be limited as follows:
  - A) The maximum allowable visible emissions from dry abrasive blasting within the interior of ships and within the small parts blasting enclosure shall not be greater than 5%;
  - B) The maximum allowable visible emissions from blast pot loading shall not be greater than 5%;
  - C) The maximum allowable visible emissions from wet and dry abrasive grit blasting operations on the exterior of ships shall not be greater than 20% opacity;
  - D) The maximum allowable visible emissions from the diesel-powered air compressors shall not be greater than 20% opacity.

[Rules 62-4.070(3), F.A.C., 62-296.712(2), and 62-296.320(4)(b), F.A.C.; Chapter 1-3.52, Rules of the EPC]

**SPECIFIC CONDITIONS:**

**7. Emission Calculations for Abrasive Grit Blasting.** In order to determine compliance with Specific Condition No. 5, PM emissions shall be calculated using the Total PM emission factor for the abrasive media used during the latest compliance test and specified in Specific Condition 8.A, (5 mph wind speed) from Table 13.2.6-1, AP-42, Compilation of Air Pollutant Emission Factors, Fifth Edition (27 lb PM/ 1000 lb abrasive) and applying a control efficiency equal to 80 percent for wet blasting and 70% for dry blasting. [Rules 62-4.070(3), 62-210.200 – “Potential to Emit”, 62-296.320 F.A.C.; Construction Permit Application received on March 16, 2012]

**8. Hours of Operation.** The combined hours of operation of the two diesel-fired compressors used for dry blasting are limited to 2,000 hours per consecutive 12 month period. The remaining portions of the blasting operations are permitted to operate continuously (i.e. 8,760 hours per consecutive 12 month period). [Rule 62-210.200 – “Potential to Emit”, F.A.C.: and Construction Permit Application received on March 16, 2012]

**9. Abrasive Blasting Work Practice Limitations.** In order to demonstrate compliance with Specific Conditions Nos. 5 and 6, the following operating restrictions shall apply:

- A) The permittee shall use only black beauty (coal slag), metallic grit (e.g. nickel, copper, etc.), minerals (e.g. garnet), and glass beads (new or recycled) for dry abrasive blasting material unless prior notification is provided to the Environmental Protection Commission of Hillsborough County (EPC) to use any other new material.
- B) The permittee shall provide written notice to the EPC at least 7 days prior to scheduled use of any new blasting material not previously recognized for use at the facility.
- C) The permittee shall use no spent abrasive material.
- D) Blasting operations are individually limited to a maximum of 4 external dry blasting nozzles and 4 internal dry blasting nozzles in operation simultaneously at any time.
- E) The permittee shall conduct all blasting from the top of the part down with the nozzle directed downward in order to minimize airborne emissions, except when blasting beneath the part or when it is physically impractical.
- F) The permittee shall use tarps or barriers with at least 95% shade factor at all times when performing dry abrasive blasting on any external portion of a vessel or a miscellaneous part thereof. The tarps or barriers shall surround and extend above the blasting surface, with complete enclosure at all times to contain the dust and limit the opacity to below the standard for the area being blasted, and to keep the dust from entering the waters of Tampa Bay. When wet blasting, the extent of the enclosure may be less.
- G) All dry blasting of parts separate from the ship shall be performed in an area fully enclosed (including the top) with tarps/screens (i.e. the small parts blasting enclosure). If a part is too large to fit in a full enclosure, then the area of the part being blasted must be fully surrounded with tarps.

**SPECIFIC CONDITIONS:**

- H) When blasting an internal section of a ship, the displaced air shall be passed through a filter device or a tarp enclosure that covers the exhaust points from the internal blasting prior to exhausting to the atmosphere
- I) All blasting pot loading operations shall utilize a sock filter or tarp enclosure as needed to meet the opacity standard. The permittee shall also minimize the pot openings and drop distances as much as possible during loading operations.
- J) The permittee shall ensure that during wet abrasive blasting, the water curtain surrounding the central blasting nozzle is operating as designed with sufficient water flow to control the particulate matter emissions below the opacity standard.
- K) The permittee shall enclose, cover or maintain filters on all drains or openings in and around the area where ships and parts are blasted in order to collect spent grit and other abrasive blasting remnants that may wash away from the area.
- L) In areas around the blasting locations where the water may flow toward the canal, the facility shall use booms or other barriers that act as filters to remove particulate as it passes through the barrier in order to prevent the spent material from entering the waterway.
- M) The permittee shall use only manual sweeping, shovels or vacuum systems to clean-up spent blasting materials. No blowers are permitted.
- N) Only diesel fuel shall be burned in the diesel-powered air compressors. Used or waste oils are not permitted.
- O) All blasting operators are required to be trained on procedures which minimize airborne emissions of blasting materials. Records of training (when it was offered and who attended) will be maintained and made available for inspectors of the Environmental Protection Commission of Hillsborough County upon request.

[Rules 62-4.070(3), 62-296.320, and 62-210.200 – “Potential to Emit”, F.A.C.; and Construction Permit Application received on March 16, 2012]

**10. Small Parts Blasting/Painting Enclosure Limitations.** The small parts blasting/painting enclosure shall be covered on all sides, including the top, with tarps or barriers with at least 95% shade factor to fully enclose the blasting and painting of miscellaneous parts separate from the ships. To minimize the potential impact of the blasting/painting operations to the soil, the blasting/painting containment area shall operate over an impermeable surface, such as concrete or sealed asphalt, and be surrounded by berms, dikes, or other equivalent barriers to minimize the effect of water run-off from the area. [Rule 62-4.070(3), F.A.C.]

**11. Initial Compliance Test.** On the first external dry abrasive blasting operation subsequent to the issuance of this permit, the facility shall conduct an initial compliance test for visible emissions on all emission units associated with dry external blasting including:

- EU004 – External Ship Dry Blasting
- EU006 – Small Parts Blasting Enclosure

**SPECIFIC CONDITIONS:**

- EU007 – Blast Pot Loading
- EU008 – Diesel Powered Air Compressors

An initial visible emission compliance test is also required on these emission units each instance a new blasting media is used at the facility for the first time and has never previously been tested. Subsequent annual testing on these emission units thereafter can be performed using any blasting media. Wet abrasive blasting on ship exteriors (EU001), dry abrasive blasting on ship interiors (EU005), and associated blast pot loading and diesel compressor operation are required to be tested initially and annually thereafter in accordance with Permit No. 0571417-001-AC. [[Rules 62-4.070(3) and 62-297.310(7)(a)4., F.A.C.; and Chapter 1-3.51, Rules of the EPC]

**12. Test Frequency.** In order to demonstrate continuous compliance with Specific Condition No. 6, the permittee shall perform a visible emission annually, during each federal fiscal year (October 1 through September 30), with a target date established by the initial compliance test required in Specific Condition No. 11. If a required testing point on an emission unit is not operated during the fiscal year, a test is not required for that affected source; however, a VE test is required at the next instance of that source's operation. [Rule 62-297.310(7), F.A.C., and Chapter 1-3.50, Rules of the EPC]

**13. Compliance Test Methods.** EPA Method 9 shall be used to determine compliance for visible emissions (VE). The visible emissions test shall be conducted by a certified observer and be a minimum of thirty (30) minutes in duration. The test observation period shall include the period during which the highest opacity can reasonably be expected to occur. The minimum requirements for stationary point source emissions test procedures and reporting shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-296.712(3)(a) and 62-297.310(4), F.A.C.]

**14. Test Requirements.** Testing of emissions shall be conducted with the sources operating at 90-100% capacity as defined below. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than 15 fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the actual operating conditions, including the pressure differential across the dust collector may invalidate the test:

- A) Capacity for the dry external abrasive blasting operation on ships is defined as blasting with 4 nozzles operating simultaneously;
- B) Capacity for the dry abrasive blasting operation within the small parts blasting enclosure is defined as blasting with 2 nozzles operating simultaneously;
- C) Capacity for the dry internal abrasive blasting operation within ships is defined as blasting with 4 nozzles operating simultaneously;
- D) Capacity for the air compressors is defined as operation at their highest level to produce the typical required pressures for the blasting lines. In order to assure testing during its highest load, testing shall be conducted while blasting is actively occurring and the

**SPECIFIC CONDITIONS:**

corresponding lines are being fed by the compressor. The test report should include operating pressure of the unit and a statement about the number of nozzles being used for blasting.

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

**15. Compliance Test Notification.** The permittee shall notify the Air Compliance Section of the EPC 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 test contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)(9), F.A.C.]

**16. Test Report Submittal.** The permittee will submit two (2) copies of the compliance test report required by this permit to the Air Compliance Section of the EPC within forty-five (45) days after the test is complete. The test report shall contain sufficient detail on the source tested and the test procedures used to allow the EPC to determine if the test was properly conducted and the test results properly computed. [Rule 62-297.310(8), F.A.C.]

**17. Special Compliance Testing.** 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 emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it shall 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. [Rule 62-297.310(7)(b), F.A.C.]

**18.** In order to ensure compliance with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ, the stationary compression ignition internal combustion engines (CI ICE) used to operate the blasting operations shall meet, at a minimum, the following specifications: [Rule 62-4.070(3), F.A.C. and Construction Permit Application received on March 16, 2012]

- A) The permittee shall maintain compliance, as applicable for each engine, with the Specific Conditions in Attachment A of this permit - 40 CFR 60 Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines). Attachment A is an enforceable component of this permit.
- B) The permittee shall maintain compliance, as applicable for each engine, with Attachment B of this permit - 40 CFR 63 Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). Attachment B is an enforceable document that is part of this permit

**Facility-wide Limitations**

**19. 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.

SPECIFIC CONDITIONS:

20. [Reserved.]

**21. Visible Emissions (VE).** Visible emissions from the cleanup activities for the spent abrasive grit from wet blasting, and any other particulate matter emitting activity not subject to an emission unit-specific limitation or having previously been limited in this permit, 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]

**22. 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.]

**23. 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**

**24. Records.** In order to demonstrate continuous compliance with Specific Condition No. 5, the permittee shall maintain daily records of all blasting operations, inventory records, and other data necessary to substantiate monthly blasting activity. The records shall contain the following information, at a minimum:

- A) Day, Month, and Year of the data recorded;
- B) For all abrasive blasting operations (including blast pot loading), record the type of blast media used, the blasting method used (i.e. wet or dry blasting, internal or external blasting, etc.), and the amount of blast media used;
- C) For all abrasive blasting operations, record the make/model/size of each diesel-powered air compressor, the hours of operation of each compressor, and the type of blasting for which each compressor was used;
- D) By the 10<sup>th</sup> day of the month, record the amount of abrasive blasting media used and hours of operation of each air compressor for the previous month, along with the rolling total for the preceding consecutive 12-month period;
- E) By the 10<sup>th</sup> day of the month, calculate the monthly PM emissions from the blasting operations for the previous month and the rolling total for the preceding consecutive 12-month period.

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

**SPECIFIC CONDITIONS:**

**25. 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.]

**26. 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.]

**Permit Applications and Transfers**

**27. 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.]

**28. 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.]

**29. 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.]

**30. Operation Permit Application.** A complete application for an air operation permit shall be submitted to the Environmental Protection Commission of Hillsborough County within 90 days of the date of the initial compliance test required in Specific Condition 11, or at least 60 days prior to the expiration of this permit, whichever comes first. To properly apply for an operation permit, the applicant shall submit the following:

- A) The appropriate Department application form [see Rule 62-210.900, F.A.C. (Forms and Instructions)];
- B) The appropriate operation permit application fee(s);
- C) Copies of the records specified in Specific Condition No. 24 for the most recent three (3) months of operation. If the source has been operating for less than three (3) months, include records for the entire period.

**SPECIFIC CONDITIONS:**

- D) Copy of the initial visible emissions compliance test as specified in Specific Condition No. 11.

[Rules 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

**31. Modification for Permit Extension.** The permittee may request that this permit be extended as a modification of the permit. Such a request must be submitted to the EPC in writing before the expiration of the permit. Upon timely submittal of a request for extension, unless the permit automatically expires by statute or rule, the permit will remain in effect until final agency action is taken on the request. An extension shall be granted if the applicant can demonstrate reasonable assurances that the extended permit will comply with the standards and conditions applicable to the original permit. [Rule 62-4.080(3), F.A.C.]

**32. Not Enforceable: Best Management Practices (BMP).** Appendix EPC Abrasive Blasting BMP is a part of this permit to be used as a reference guideline for employing best management practices. The permittee should continue to pursue and implement best management practices in conjunction with this guideline. The content of the BMP itself is not an enforceable part of the permit. [Rule 62-296.320 and 62-4.070(3), F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director