



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Thomas Sign & Awning Company, Inc.
4590 118th Avenue North
Clearwater, FL 33762

Facility ID No. 1030154

PROJECT

Project No. 1030154-001-AC
Application for Minor Air Construction Permit
Surface Coating Facility Re-permitting

COUNTY

Pinellas County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

May 31, 2012

Prepared by Nedin Bahtic

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GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources – Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

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

I. Project Description:

A. Applicant:

Ms. Priscilla Thomas, President
Thomas Sign & Awning Company, Inc.
4590 118th Avenue North
Clearwater, FL 33762

B. Professional Engineer:

Mr. Barry Westmark, P.E.
Environmental Consulting & Technology, Inc.
1408 N Westshore Boulevard, Suite 115
Tampa, FL 33607

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C. Project Location:

4590 118th Avenue North
Clearwater, FL 33762



Figure 1. Aerial view of the facility.

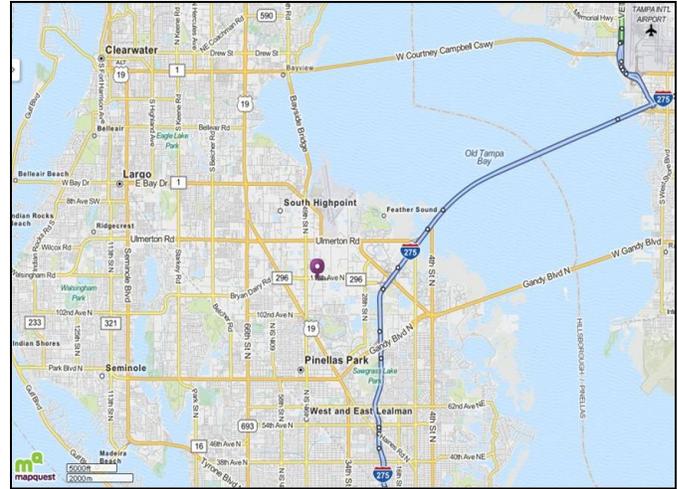


Figure 2. Facility location (street map view).

D. Project Summary:

This project is for the after-the-fact air construction permit for the surface coating operations at the existing sign manufacturing facility. The facility utilizes two paint spray booths and a brush painting area for the coating of metal and plastic sign parts and metal sign posts. The facility was initially permitted in 1989, but was then determined to be exempt in 1995 (at the current location, operation commenced in 1994). Following an inspection conducted by the Pinellas County Air Quality Division in September 2011 that indicated the facility no longer met the exemption criteria (i.e., using no more than 750 gallons of materials containing VOC per year), the Department issued Notice of Permit Determination in February 2012 requiring the facility to again obtain an air pollution permit. With this permit, the facility's VOC (Volatile Organic Compounds) and total HAP (Hazardous Air Pollutants) emissions will be limited to 22.8 tons per year and 8.6 tons per year, respectively.

E. Application Information:

Application Received on: 04/27/2012
Additional Information Requested on: N/A
Additional Information Received on: N/A
Application Complete: 05/14/2012

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II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. - Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	surface coating operations (EU No. 001) could be a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	surface coating operations are a source of VOC and odors
Rule 62-296.401-470, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	Y	Rule 62-296.513, F.A.C. (Surface Coating of Miscellaneous Metal Parts and Products) applies to surface coating operations
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	there is no applicable source category
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS - 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS -40 CFR 63)	N	there is no applicable source category
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	no emissions testing is required

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III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tons/year)	Allowable Emissions (tons/year)
VOC	001 - Surface Coating Operations	22.8	22.8
	Total	22.8	22.8
Total HAPs	001 - Surface Coating Operations	8.6	8.6
	Total	8.6	8.6
<i>INDIVIDUAL HAP</i>			
Ethyl Benzene (H085)	001 - Surface Coating Operations	0.7	N/A
	Total	0.7	
Methanol (H115)	001 - Surface Coating Operations	1.6	
	Total	1.6	
Toluene (H169)	001 - Surface Coating Operations	3.6	
	Total	3.6	
Vinylidene Chloride (H185)	001 - Surface Coating Operations	2.6	
	Total	2.6	

IV. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

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

V. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).