



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

RICK SCOTT  
GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

## NOTICE OF PERMIT AMENDMENT

Mr. Philip Gonzalez, Plant Manager  
Instrument Transformers, Inc.  
1907 Calumet Street  
Clearwater, FL 33765

Re: To Replace Varnish Dipping Surface Coat Operation with Automatic Spray Surface Coat Varnish System  
DEP Project File No.: 1030528-004-AF  
Reference DEP Permit No.: 1030528-003-AF

Dear Mr. Gonzalez:

On July 11, 2013, the Department received a letter from Mr. Jeff Mu requesting an amendment to air permit 1030528-003-AF. This permit was issued on April 21, 2011, and is for an electrical transformer manufacturing facility. As requested, the following amendments are hereby made as follows:

### SECTION 1. GENERAL INFORMATION

#### FACILITY AND PROJECT DESCRIPTION

##### Existing Facility

##### General Overview of Manufacturing Process

##### *Fourth Paragraph*

FROM:

The facility operates five (5) varnish dip process areas and a Black Water Reducible (W/R) (Egyptian Coating) operation. The purpose of the varnish dip process is to provide a protective coating to finish transformers and windings. After varnish dipping, transformers are either air-dried or cured in an electric oven.

TO:

The facility operates a robotic varnish system used for the varnish coating of fabricated Control Power Transformers (CPT) and other affiliated products. This automated varnish coating system replaced the former manual surface coating process (Varnish Dip) previously operated on the CPT product manufacturing line. Bushing Core Transformer (BCT) varnish functions are also performed by the CPT robot line. After varnish coating transformers are either air dried or cured in an electric oven.

**Facility Description**

FROM:

The existing facility consists of the following emissions units (EUs).

Facility ID No. 1030528	
EU ID No.	Emission Unit Description
001	Varnish Dip Process Areas and Black Water Reducible (W/R) (Egyptian Coating) Operation (VOC RACT)
002	Miscellaneous Non-VOC RACT Activities

TO:

The existing facility consists of the following emissions units (EUs).

Facility ID No. 1030528	
EU ID No.	Emission Unit Description
001	CPT Robotic Varnish Surface Coating System. (VOC RACT)
002	Miscellaneous Non-VOC RACT Activities

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. EU No. 001 – Varnish Dip Process Areas and Black Water Reducible Operation**

**Header**

FROM:

**A. EU No. 001 - Varnish Dip Process Areas and Black Water Reducible Operation**

TO:

**A. EU No. 001 – CPT Robotic Varnish Surface Coating System**

*Emission unit description*

FROM:

EU ID No.	Emission Unit Description
001	<p data-bbox="331 401 1446 464"><u>Varnish Dip Process Areas and a Black Water Reducible (W/R) (Egyptian Coating) Operation (VOC RACT) -</u></p> <p data-bbox="331 485 1430 617">This emission unit consists of five (5) varnish dip process areas and a Black W/R (Egyptian Coating) operation, which are subject to the VOC Reasonable Available Control Technology (RACT) requirements of Rule 62-296.513, F.A.C. – Surface Coating of Miscellaneous Metal Parts and Products.</p> <p data-bbox="331 638 1455 940">The five (5) varnish dip processes, which use primarily AC-43 varnish, are located in the following departments: Control Power Transformer (CPT), Medium Voltage, BCT, Room 9, and Electronics. The CPT varnish dip tank is the largest of the varnish dip tanks. The purpose of the varnish dip process is to provide a protective coating to finish transformers and windings. Finished transformers of various sizes are manually dipped, hand-brushed, or drizzled with varnish. Transformers may either be air-dried or cured in an electric oven after varnish dipping. Secondary touch-up operations can occur at operator workstations throughout the facility. A smaller, one-gallon dip can is also used to clear-coat transformers in the Electronics shop.</p> <p data-bbox="331 961 1455 1163">The Black W/R (Egyptian Coating) operation is a part dipping process conducted on transformer components. In the process, parts are dipped into a bath of water based polymer (Egyptian Coating) solution. After approximately 5 to 50 seconds, the dipped parts are removed and typically air dried for further processing. The purpose of the process is to provide a protective coating to the dipped parts, as well as impart rust protection and insulation properties.</p> <p data-bbox="331 1184 1430 1247">All of the coatings utilized in the above operations are reported by the vendor MSDS to be at or below 4.3 pounds VOC (less water) per gallon.</p>

TO:

EU ID No.	Emission Unit Description
001	<p><u>CPT robotic varnish surface coating system.</u> -</p> <p>This emission unit consists of a robotic varnish system used for the varnish surface coating of fabricated Control Power Transformers (CPT) and other affiliated products which is subject to the VOC Reasonable Available Control Technology (RACT) requirements of Rule 62-296.513, F.A.C. – Surface Coating of Miscellaneous Metal Parts and Products.</p> <p>This automated varnish coating system replaced the former manual surface coating process (Varnish Dip) previously operated on the CPT product manufacturing line. Bushing Core Transformer (BCT) varnish functions are also performed by the CPT robot line. The robotic varnish system includes an automatic spray booth, robotic spray arm, and a 6,000 XCFM Model 165X-Series open coil process electrically-powered air heater.</p> <p>After varnish coating transformers are either air dried or cured in an electric oven.</p> <p>Secondary touch-up operations can occur at operator workstations throughout the facility. A small, one-gallon dip can is also used to clear-coat transformers in the Electronics shop.</p> <p>The purpose of the process is to provide a protective coating to the dipped parts, as well as impart rust protection and insulation properties.</p> <p>All of the coatings utilized in the above operations are reported by the vendor MSDS to be at or below 4.3 pounds VOC (less water) per gallon.</p>

***Specific Condition No. A.2.a.:***

FROM: facility name, facility ID, and emission unit number (i.e., 1030528, EU 001 - Varnish Dip Process Areas and a Black W/R (Egyptian Coating) Operation);

TO: facility name, facility ID, and emission unit number (i.e., 1030528, EU 001 - CPT robotic varnish surface coating system);

***Specific Condition No. A.2.d:***

FROM: the application method (e.g., Dip Coating, Egyptian Coating, etc.) and substrate type (e.g., metal);

TO: the application method (e.g., spray application.) and substrate type (e.g., metal);

A person whose substantial interests are affected by the proposed permit amendment 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 Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice. 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.

All petitions filed under these rules shall contain:

- (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; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of when and how the petitioner received notice of the agency decision;
- (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 agency's proposed action;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency'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 agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department'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 Department's final action may be different from the position taken by it in this permit amendment. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

This permit amendment is final and effective on the date filed with the Clerk of the Department unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. or unless a request for an extension of time in which to file a petition is filed within the time specified for filing a petition. Upon timely filing of a petition or a request for an extension of time to file the petition, this permit amendment will not be effective until further Order of the Department.

Any party to the Order (Permit Amendment) has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal under Rule 9.110 of the Florida rules of Appellate Procedure,

with the clerk of the Department of Environmental Protection in the Office of General Counsel, Douglas Building, 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 of Appeal must be filed within 30 days after this Order is filed with the Clerk of the Department.

This letter must be attached to and becomes a part of air permit 1030528-003-AF. If you have any questions, please contact the Project Engineer, Richard Spaulding, PE, at (813) 470-5728, or by email at richard.spaulding@dep.state.fl.us

Executed in Hillsborough County, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



Kelley M. Boatwright  
District Air Program Administrator  
Southwest District

KMB/NEK/ras/admin

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Permit Amendment was sent by electronic mail before the close of business on the date indicated below to the person(s) listed:

Mr. Philip Gonzalez, Plant Manager, Instrument Transformers Inc., [Philip.Gonzalez@ge.com](mailto:Philip.Gonzalez@ge.com)

Ms. Cherril Simmons, Instrument Transformers, Inc., [Cherril.Simmons@ge.com](mailto:Cherril.Simmons@ge.com)

Mr. Francisco J. "Paco" Amram, P.E., Environmental Consulting & Technology, Inc, [pamram@ectinc.com](mailto:pamram@ectinc.com)

Mr. Gary Robbins, Environmental Program Coordinator - Pinellas Co. Air Quality Division,  
[grobbs@pinellascounty.org](mailto:grobbs@pinellascounty.org))

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
(Clerk)

8/16/2013  
(Date)