Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

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Lt. Governor

Herschel T. Vinyard Jr.
Secretary

DRAFT PERMIT

PERMITTEE

Pop's Painting, Inc.
3805 Drane Field Road
Lakeland, FL 33811

Authorized Representative:
Mr. Mark Woods, President

Air Permit No. 1050226-011-AC
Permit Expires: 07/01/2015
Pop's Painting, Inc.
Minor Air Construction Permit
Project Name: Construction Permit Modification

This is the final air construction permit to install two additional spray paint booths to Emission Unit 003 - Surface Coating. One additional shot blast machine and one additional blast room, each with a dust collector, will be installed as part of Emission Unit 005 – Shot/Grit Blasting Operations. One dust collector will be installed for three of the existing shot-blast machines that currently exhaust indoors as part of Emission Unit 005. A dust collector that currently exhausts back into a blast room will be modified to exhaust outside. The proposed work will be conducted at the Pop's Painting, Inc., facility (Standard Industrial Classification No. 3441). The facility is located in Polk County at 3805 Drane Field Road in Lakeland, Florida. The UTM coordinates are Zone 17, 399.36 km East, and 3097.60 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

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Robert C. Wong Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mark Woods, President
Pop's Painting, Inc.
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Clerk Stamp

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

DRAFT

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility prepares metal parts and equipment for surface coating using steel shot, steel grit or sand blasting. After blasting the parts/equipment can be lined, painted or powder coated. The existing facility consists of the following emissions units.

Facility ID No. 1050226	
ID No.	Emission Unit Description
001	Sand Storage Silo No. 1 (North)
002	Sand Storage Silo No. 2 (West)
003	Surface Coating
004	Sand Storage Silo No. 3 (East)
005	Shot-Blast Machine
007	Sandblasting Operation

Project Description and Affected Emission Units

The applicant proposes to install two paint spray booths (one 21′ X 120′ and one 18′ X 80′). One additional Wheelabrator shot blast machine with a Pangborn dust collector and one additional blast room with a Torit dust collector will also be installed. One Dust Hog dust collector for three of the existing shot-blast machines that currently exhaust indoors will be installed. Currently the exhaust from the existing blast room passes through a Farr dust collector which vents back into the room. This will be modified to route the exhaust from the dust collector outside. Visible emissions testing requirements will be removed from EU Nos. 001, 002 and 004 and a sand throughput limitation will be added. An hours of operation limit will be added to EU No. 005. This project will modify the following emissions units.

Facility ID No. 1050226	
ID No.	Emission Unit Description
001	Sand Storage Silo No. 1 (North)
002	Sand Storage Silo No. 2 (West)
003	Surface Coating
004	Sand Storage Silo No. 3 (East)
005	Shot/Grit Blasting Operations

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Units/Activities

One emergency diesel generator constructed or reconstructed before June 12, 2006. It is rated at 80 kW (107.2 HP). The generator is subject to 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. As of the

effective date of this permit the Federal rule pertaining to existing engines at area sources has not been adopted by the State of Florida. If this generator is modified or reconstructed it will no longer be considered an existing engine and it will become subject to 40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and the owner or operator shall comply will all limitations and requirements of this subpart that apply to this generator.
[Rule 62-210.300(3)(a)35., F.A.C.]

The following items at the facility are categorically exempt emission units per Rule 62-210.300(3)(a)33., F.A.C.:

- 40′ x 12′ walk-in oven powered by natural gas – two (2) 2.5 million Btu heater nozzles.
- 62′ x 8′ conveyor oven powered by natural gas – 4.5 million total Btu rated.
- 12′ x 4′ closet style oven powered by natural gas – 750,000 total Btu rated.

The following items at the facility are generically exempt emission units/activities per Rule 62-210.300(3)(b)1., F.A.C.:

- 20′ x 12′ powder coat paint booth.
- 10′ x 4′ manual powder coat booth.
- 8′ x 4′ manual powder coat booth.
- 6′ x 6′ manual, powder coat booth.
- Two (2) electric ovens.

(*Permitting Note: The permittee shall track the consumption/usage of natural gas and powder coat from the insignificant units. Any VOC/HAP emissions generated from the exempt/insignificant unit/s shall be added to the facility VOC/HAP emissions and shall not exceed the Title V threshold at any time.*)

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants particulate matter under 10 micrometers (PM_{10}), volatile organic compounds (VOC) and Hazardous Air pollutants (HAPs). The emission limitations and restriction on hours of operation in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

Modifies Permit No. 1050226-010-AC.

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;
b. Appendix B. General Conditions;
c. Appendix C. Common Conditions; and
d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit -This permit authorizes modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. Since operations might commence at different times for the activities covered by this construction permit, more than one operation permit application may be required. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

c. copies of the most recent month of records/logs specified in Specific Condition Nos. A.4., B.7., C.5. and D.3.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050, 62-4.220, F.A.C.]

FACILITY-WIDE SPECIFIC CONDITIONS

9. Unconfined Emissions of Particulate Matter - In addition to Condition 9. of Appendix C., the following reasonable precautions shall be followed:

a. If public nuisance problems are created by fugitive dust, overspray and/or odors, the Department may require additional control measures, such as partial or total enclosure of open-air sandblasting or surface coating operations.

b. As an indicator that the reasonable precautions are adequate, visible emissions (VE) at the property line should not exceed 10%. If this value is exceeded, it shall not be considered a violation in and of itself, but may be a violation of the reasonable precautions required to be taken and/or may require additional precautions to be taken.

c. If necessary, the speed of the vehicular traffic on the unpaved road shall be reduced to a level minimizing the production of dust.

d. If necessary, further vehicular traffic dust control requirements may include the periodic application of non-potable water to the unpaved road surface and keep records of such applications.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

A. EU Nos. 001, 002 & 004 – Sand Storage Silos

This section of the permit addresses the following emissions units (EUs).

EU ID Nos.	Emission Unit Description
001, 002 and 004	All three silos receive sand pneumatically by truck. Emissions from the sand storage silos are each controlled by a Trinco Deluxe Model baghouse having a total cloth filtration area of 90 square feet.

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 ("Potential to Emit"), F.A.C.]

A.2. Throughput Limitation – The maximum throughput of all three silos combined is 2,300 tons of sand per any consecutive 12-month period.
[Rules 62-4.070(3) and 62-210.200 ("Potential to Emit"), F.A.C.]

EMISSIONS STANDARDS

A.3. Visible Emissions Indicator - As an indicator that the control devices (i.e. baghouses) are functioning properly, visible emissions from each baghouse should not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but may indicate that additional control methods or procedures are necessary.
[Rule 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

A.4. Sandblasting Material Recordkeeping Requirements - The permittee shall keep records monthly to document compliance with the sand throughput limitations of Specific Condition A.2. The records shall include the following for each calendar month:

a. facility name, facility ID No., emission unit ID No. and description (e.g., Pop's Painting, Inc., 1050226, EU 001 - Sand Storage Silos);

b. month/year;

c. amount of sand received (tons/month); and

d. amount of sand received for the most recent consecutive 12-month period.

The records shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.]

B. EU No. 003 – Surface Coating

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emission Unit Description
003	The indoor surface coating operations are currently performed in a Binks 49′ x 16′ paint spray booth and a SBS 13′ x 60′ paint spray booth. A 21′ X 120′ paint spray booth and an 18′ X 80′ paint spray booth will be fabricated on site. The outdoor (open-air) surface coating is applied to miscellaneous large metal parts utilizing three (3) airless applicator spray units. The spray applicators and spray guns are cleaned once a day with solvents. VOC and HAPs from surface coating material and solvent/thinners are emitted uncontrolled. Fans pull air through filters and ducts in each of the paint spray booths. Particulate matter (PM) emissions are controlled from the booths using panel filters at the inlet ducts of the fans. PM emissions from outdoor surface coating operations are controlled by work practice requirements.

PERFORMANCE RESTRICTIONS

B.1. Hours of Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 ("Potential to Emit"), F.A.C.]

B.2. Solvent Usage - Used solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations.
[Rule 62.4.070(3), F.A.C.]

B.3. Paint Booth Filter Requirements – Paint spray booth filters must be in place during all painting operations inside a paint spray booth.
[Rule 62.4.070(3), F.A.C.]

B.4. Unconfined Emissions of Particulate Matter – the following reasonable precautions shall be followed:

a. All indoor surface coating shall be conducted in one of the paint spray booths. All open-air surface coating shall be conducted in such a manner as to avoid causing overspray material to cross property lines. Open-air surface coating operations shall cease if wind conditions or other circumstances result in overspray causing a public nuisance problem outside the plant property.

b. The fans shall be operated at all times when spray painting is conducted in a paint spray booth.

(Permitting Note: Also see Section 2., Specific Condition No. 9. for additional precautions for unconfined emissions of particulate matter.)

[Rule 62-210.200 ("Potential to Emit"), F.A.C.]

EMISSIONS STANDARDS

B.5. Emissions Limitations - Emissions from surface coating operations shall comply with the following:

Pollutant	**Emission Limit** (tons per any consecutive 12-month period)
Volatile Organic Compounds (VOC)	90.0
Any Individual Hazardous Air Pollutants (HAP)	9.0
Total Hazardous Air Pollutants (HAPs)	23.0

(*Permitting Note: Spray booth emissions are combined with existing open-air surface coating emissions.)*

[Rule 62-210.200 ("Potential to Emit"), F.A.C.]

NOTIFICATION REQUIREMENTS

B.6. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of each of the new paint spray booths (one 21′ X 120′ and one 18′ X 80′), no later than fifteen (15) days after that date(s). Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

B.7. Monthly Recordkeeping - The permittee shall keep records monthly to document compliance with the VOC and HAP limitations of Specific Condition B.4. The records shall include the following for each calendar month:

a. facility name, facility ID No., emission unit ID No. and description (i.e., Pop's Painting, 1050226, EU 003 - Surface Coating);

b. month, year, and method used for records (usage or purchase);

VOC Monthly Records

c. quantity (gallons) and VOC content (lbs/gal) of each VOC-containing material (surface coatings and solvents) used for the month;

d. calculated monthly VOC emissions for each VOC-containing material, in pounds or tons (based upon material VOC content);

e. calculated monthly total VOC emissions, in pounds or tons;

f. cumulative total of the VOC emissions for the most recent consecutive 12-month period, in tons;

HAP Monthly Records

g. quantity (gallons) and HAP content (lbs/gal) of each HAP-containing material (surface coatings and solvents) used for the month;

h. calculated monthly HAP emissions for each individual HAP, in pounds or tons (based upon material HAP content);

i. calculated monthly HAP emissions for total HAPs, in pounds or tons;

j. cumulative total of the HAP emissions for each individual HAP for the most recent consecutive 12-month period, in tons; and

k. cumulative total of the HAP emissions for total HAPs for the most recent consecutive 12-month period, in tons.

Monthly records shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.

[Construction Permit 1050226-010-AC]

B.8. Documentation - Supporting documentation (e.g. Material Safety Data Sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for the records required by this document shall be kept. At the permittee's option, "quantity purchased" may be reported to satisfy the requirement of "quantity used", provided no material is used which is not purchased; these logs may be based on the beginning and ending inventories, deliveries, shipments, etc.
[Rule 62-4.070(3), F.A.C.]

C. EU No. 005 – Shot/Grit Blasting Operations

This section of the document addresses the following emissions unit (EU).

EU ID No.	Emission Unit Description
005	Shot/grit blasting is used to prepare metal parts and equipment for painting. The following pieces of equipment are included in this emission unit: - Wheelabrator shot-blast machine with a Torit dust collector with a design flow rate of 11,000 cfm (in existing building); - three shot-blast machines with a shared Dust Hog dust collector with a design flow rate of 5,500 cfm (in existing building); - blast room with a Farr dust collector with a design flow rate of 39,000 cfm (in existing building); - Wheelabrator shot-blast machine with a Pangborn dust collector with a design flow rate of 17,600 cfm (in future building); and - blast room with a Torit dust collector with a design flow rate of 8,000 cfm (in future building). The blast material is delivered to the facility in 55 gallon drums and 50 lb bags. The drums and bags are stored in the area around the blast machines. The blast material is recycled until it is no longer effective. The remaining material is sent to the landfill.

PERFORMANCE RESTRICTIONS

C.1. Hours of Operation - The hours of operation are limited to 2000 hours per year for each piece of equipment listed above.
[Rules 62-4.070(3) and 62-210.200 ("Potential to Emit"), F.A.C.]

C.2. Unconfined Emissions of Particulate Matter - The shot/grit blasting dust collectors shall be operated at all times when shot/grit blasting operations are taking place.

(Permitting Note: Also see Section 2., Specific Condition No. 9. for additional precautions for unconfined emissions of particulate matter.)

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

EMISSIONS STANDARDS

C.3. Visible Emissions Indicator - As an indicator that each dust collector is functioning properly, visible emissions from each dust collector should not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but may indicate that additional control methods or procedures are necessary.
[Rule 62-4.070(3), F.A.C.]

NOTIFICATION REQUIREMENTS

C.4. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of each of the new shot/grit blasting operations, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070, F.A.C. and 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

C.5. Monthly Recordkeeping - The permittee shall keep records monthly to document compliance with the hours of operation limitations of Specific Condition C.1. The records shall include the following for each calendar month:

a. facility name, facility ID No., emission unit ID No., and description (i.e., Pop's Painting, 1050226, EU 005 - Shot/Grit Blasting Operations);

Record the following for each specific piece of equipment:

b. description of the specific piece of equipment (e.g., blast room with Farr dust collector);

c. month/year;

d. number of hours per month spent conducting shot-blasting activities; and

e. total hours (hours/consecutive 12-month period) spent conducting shot-blasting activities for the most recent consecutive 12-month period.

Monthly records shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.]

D. EU No. 007 – Sandblasting Operations

This section of the document addresses the following emissions unit (EU).

EU ID No.	Emission Unit Description
007	This operation is conducted outside and is utilized for processing large items that cannot be processed in the confined blasting space. The emissions from open-air sandblasting are minimized by applying reasonable precautions and work practice requirements.

PERFORMANCE RESTRICTIONS

D.1. Permitted Capacity - The sand throughput from open-air sandblasting is limited to 2,300 tons per any consecutive 12-month period.
[Rule 62-210.200 ("Potential to Emit"), F.A.C.]

D.2. Unconfined Emissions of Particulate Matter – the following reasonable precautions shall be followed:

a. all open-air sandblasting shall be conducted in such a manner as to avoid causing material to cross property lines; and

b. open-air sandblasting operation shall cease if wind conditions or other circumstances result in fugitive dust causing a public nuisance problem outside the plant property.

(Permitting Note: Also see Section 2., Specific Condition No. 9. for additional precautions for unconfined emissions of particulate matter.)

[Rule 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

D.3. Monthly Recordkeeping - The permittee shall keep records monthly to document compliance with the sand throughput limitations of Specific Condition D.1. The records shall include the following for each calendar month:

a. facility name, facility ID No., emission unit ID No., and description (i.e., Pop's Painting, 1050226, EU 007 - Sandblasting Operations);

b. month/year;

c. amount of sand used in sandblasting operations (tons/month); and

d. total amount of sand used (tons/year) for the most recent consecutive 12-month period.

Monthly records shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.]