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

DRAFT PERMIT

PERMITTEE

Rubber Applications, Inc.
610 North Prairie Industrial Parkway
Mulberry, Florida 33860-6558

Authorized Representative:
Mr. John Polk, Vice President

Air Permit No. 1050364-003-AF
Permit Expires: xx/xx/20xx
Federally Enforceable State Operation Permit (FESOP)
Operation Permit Renewal and Revision

This is the final permit to renew and revise Air Operation Permit No. 1050364-002-AF for the surface coating, rubber lining, and sandblasting operations at the Rubber Applications, Inc. facility (Standard Industrial Classification No. 1799) located in Polk County at 610 North Industrial Park Road in Mulberry, Florida. The UTM coordinates are Zone 17, 401.93 km East, and 3086.75 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.

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

DRAFT

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Kelley M. Boatwright
District Air Program Administrator
Southwest District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including 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.

John Polk, Rubber Applications, Inc., (john@rubberapplications.com)

Lynn Robinson, Southern Environmental Services, Inc., (lrobinson@sesfla.com)

Janet Wagner, Rubber Applications, Inc., (janet@rubberapplications.com)

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

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(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility applies protective rubber lining to pieces of equipment typically used in the phosphate, pulp/paper, power, and other industries. The rubber lining protects the metal from corrosion. Operations at the facility typically consists of the following steps: removal of rubber, metal repairs, sand blasting, cleaning, cementing, rubber lining, curing of the inner surfaces, followed by sandblasting and painting of the outer surfaces.

A natural gas-fired boiler (exempt, as described below) provides steam in the autoclave for curing. Painting is completed with the use of conventional Binks airless paint spray guns. Paint gun nozzles are cleaned with solvents that are directed to closed containers for reuse. Finally, the spent solvents are placed in a 55-gallon satellite drum supplied by a hazardous waste vendor for proper disposal.

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

Facility ID No. 1050364

EU ID No.	Emissions Unit Description
001	Surface Coating, Rubber Lining, and Painting
002	Sand Storage Silo and Sandblasting

Project Description and Affected Emission Units

This project revises the previous FESOP by reclassifying the sand storage silo as an exempt activity and removing it from Emissions Unit No. 002. Sand storage silo visible emissions testing requirements and loading limitations are removed from the permit as a result. A new sand usage limitation of 900 tons per any consecutive 12-month period for the sandblasting operation replaces the previous sand storage silo loading limitation of 260 tons per any consecutive 12-month period.

EU ID No.	Emissions Unit Description
002	Sandblasting

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

Exempt Emission Units/Activities

- Distral natural gas-fired boiler, Model No. D3B150150. This is a 150-HP (approximately 5 MMBtu) boiler, categorically exempt from permitting per Rule 62-210.300(3)(a)33, F.A.C.

  Note: The steam supplied to the autoclave for curing the rubber lining is from this exempted boiler.

- Sand storage silo. The sand storage silo is exempt from permitting per Rule 62-210.300(3)(b)1., F.A.C. (Generic Emissions Unit or Activity Exemption). At 900 tons per year sand loading, the uncontrolled particulate matter emissions from the sand storage silo are significantly less than the exemption threshold of 5.0 ton/yr.

  Note: The sand storage silo delivery system is equipped with a 3' x 2' Trinco Deluxe baghouse with a side vent attached to the displacement vent of the silo.

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 hazardous air pollutants (HAPs) and volatile organic compounds (VOCs). The emission limitations, restriction on hours of operation, restriction on the type or amount of material combusted, stored or processed in this permit will ensure that the facility's single HAPs, total HAPs, and total VOC emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This operation permit renewal and revision modifies and replaces Air Operation Permit No. 1050364-002-AF.

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Resource Management Section. The 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: 813-470-5700

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

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

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. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of this operation permit. To properly apply for an 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.;

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

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

FACILITY-WIDE SPECIFIC CONDITIONS

9. Hours of Operation - The hours of operation at this facility are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.; Air Operation Permit No. 1050364-002-AF]

10. Unconfined Emissions of Particulate Matter - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter (PM). These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, storing, and handling. Reasonable precautions shall include, but not be limited to, the following:

a. Paved parking and trafficked areas shall be maintained and kept free of PM build-up; and

b. Sprinkling with water shall be used as necessary on paved areas, unpaved areas, storage piles, sand stockpiles, and during loading/unloading operations.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Air Operation Permit No. 1050364-002-AF]

11. Fugitive Emissions Opacity Standard - In order to provide reasonable assurance that the precautions and practices taken at the facility are adequate, all sources of unconfined particulate matter visible emissions (VE) at the facility's property line should not exceed ten percent (10%) opacity. Exceedance of this limit shall not be considered a violation in and of itself, but may be a violation of the precautions specified in Specific Condition No. 10 (Emissions of PM).
[Rule 62-4.070(3), F.A.C.; Air Operation Permit No. 1050364-002-AF]

A. EU No. 001 – Surface Coating, Rubber Lining, and Painting

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

EU ID No.	Emissions Unit Description
001	Surface Coating Rubber Lining, and Painting – This emissions unit collectively regulates all coating operations, rubber lining, curing, painting and clean up solvent usage. All generated HAPs and VOCs are emitted fugitively. These operations do not have a specific process, method of production, or throughput rate. The operations involve the application of industrial performance liners and related work on individual and specific tanks, pipes, vessels, and other equipment.

EMISSIONS STANDARDS

A.1. Volatile Organic Compound Limitation – Total VOC emissions from this facility shall not exceed 16.0 tons per any 12-consecutive month period.
[Rule 62-210.200 (Definition "Potential to Emit"), F.A.C.; Air Operation Permit No. 1050364-002-AF]

A.2. Hazardous Air Pollutant Limitation – Any individual HAP emission from this facility shall not exceed 9.72 tons per any 12-consecutive month period and total HAP emissions from this facility shall not exceed 16.0 tons per any 12-consective month period.
[Rule 62-210.200 (Definition of Potential to Emit), F.A.C.; Air Operation Permit No. 1050364-002-AF]

WORK PRACTICES

A.3. Operation Practice - The following procedure shall be utilized to minimize pollutant emissions:

a. Maintain tightly fitting cover, lids, etc. on all containers of OS/VOCs when they are not being handled, tapped, etc.

b. Prevent excessive air turbulence across exposed OS/VOCs.

c. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, bath, etc. of OS/VOCs so that it can be covered when not in use.

d. All fittings, valve lines, etc. shall be properly maintained.

e. All OS/VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

[Rules 62-4.070(3) and 62-296.320(1), F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.4. Recordkeeping Requirement: A monthly log shall be kept for this emission unit to document compliance with the limitations of Specific Condition Nos. A.1. and A.2. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. Purchases" may be considered to be equivalent to "usage" at the permittee's option provided that no materials are used which are not purchased. The monthly logs shall include at least the following information:

a. Facility ID No. (1050364), Emission Unit ID No. (E.U. 001) and Description;

b. Date;

c. Name of each paint, coating, and solvent used in conjunction with the surface coating, cementing, and general solvent cleanup for this facility, and usage (gallons or pounds);

d. Emission factor(s) for VOC, each individual HAP, and total HAPs for each item in A.4.c, used to calculate emissions;

e. Monthly total VOC emissions (tons);

f. Monthly emissions (tons) for each individual HAP and for total HAPs; and

g. Cumulative totals for VOC, each individual HAP, and total HAPs emissions (tons) for the most recent consecutive 12-month period.

IMPORTANT NOTE: *The Individual HAP emissions limit in Specific Condition No. A.2. is very close to the Title V threshold of 10 tons/year. Please be aware that if the Title V thresholds is exceeded, the facility will become a Title V and will be required to obtain a Title V permit.*

Supporting documentation ("As Supplied" sheets, "As Applied" sheets, Material Safety Data Sheets (MSDS), EPA data sheets, purchase orders, etc.) shall be kept for each material used which includes sufficient information to determine HAP and VOC emissions and compliance. The logs shall be made available to the Department upon request. All monthly records shall be completed by the end of the following month.

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

B. EU No. 002 - Sandblasting

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

EU ID No.	Emissions Unit Description
002	Sandblasting – This emissions unit involves the use of silica sand from a sand storage silo placed into a pressurized pot for blasting operations with an air-powered #6 3/8" sandblaster nozzle. Sandblasting operations are performed on the inner and outer surfaces of fabricated metal at the facility prior to cleaning and painting activities. Particulate matter emits fugitively from the sandblasting operation.

PERFORMANCE RESTRICTIONS

B.1. Sand Usage Limitation - The total quantity of sand used for sandblasting shall not exceed 900.0 tons per any consecutive 12-month period.

[Rule 62-210.200 (definition of Potential to Emit), F.A.C.; Permit Application dated May 1, 2013]

WORK PRACTICES

B.2. Sandblasting Area Reasonable Precautions - Operation of the sandblasting area has been determined by the Department to be regulated in accordance with Rule 62-296.320(4)(c), F.A.C. Therefore, the reasonable precautions that shall be implemented to control unconfined emissions of particulate matter are as follows:

a. At all times, only sand blasting material with a dust suppressant shall be used, in quantities consistent with the supplier's recommendation; and

b. At all times, the permittee shall cease operation if the visible emissions at the property line exceed ten percent (10%) as addressed in Specific Condition No. 11.

[Rule 62-4.070(3), F.A.C.; Air Operation Permit No. 1050364-002-AF]

RECORDKEEPING AND REPORTING REQUIREMENTS

B.3. Recordkeeping Requirement - A monthly log shall be kept for this emission unit to document compliance with the limitations of Specific Condition No. B.1. The logs may be based on the Sand Silo's beginning and ending inventories, deliveries, shipments, etc. "Purchases" may be considered to be equivalent to "usage" at the permittee's option provided that no materials are used which are not purchased. The monthly logs shall include at least the following information:

a. Facility ID No. (1050364), Emission Unit ID No. (E.U. 002) and Description;

b. Date;

c. Monthly total amount of sand loaded into silo (tons); and

d. Cumulative total amount loaded into silo (tons) for the most recent consecutive 12-month period.

All monthly records shall be completed by the end of the following month.

[Rule 62-4.070(3), F.A.C.; Permit Application date May 1, 2013]