TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

Facility ID No. 1050364

PROJECT

Project No. 1050364-003-AF
Application for Federally Enforceable State Operation Permit
Project Name: Operation Permit Renewal and Revision

COUNTY

Polk County, Florida

PERMITTING AUTHORITY

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

July 31, 2013

Prepared by Nwankaku Onwunli

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. Facility Description:

This existing 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 consist 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.

II. Project Description:

A. Applicant:

Mr. John Polk, Vice President
Rubber Applications, Inc.
610 North Prairie Industrial Parkway
Mulberry, Florida 33860

B. Professional Engineer:

Mr. Lynn Robinson, P.E.
Southern Environmental Services, Inc.
1204 North Wheeler Street
Plant City, Florida 33563

C. Project Location:

610 North Prairie Industrial Parkway
Mulberry, Florida 33860

D. Project Summary:

This project will increase the sand usage limitation from 260 tons/yr to 900 tons/yr, remove the sand silo as a regulated emissions unit per Rule 62-210.300(3)(b)1, F.A.C., and remove the requirement for visible emissions testing per guidance memorandum DARM-PER-33 (March 1, 2000) as further described in the permit.

E. Application Information:

Application Received on: May 1, 2013
Additional Information Requested on: May 30, 2013
Additional Information Received on: July 30, 2013
Application Complete on: July 30, 2013

III. Applicable State and Federal Regulations

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	facility operations 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	facility operations are a source of VOC and may be a source of odors
Rule 62-296.401-418, 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)	N	Polk County is not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	this is a new source, therefore not subject to the PM RACT rule
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

Subject to:	Y/N	Comments
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	testing is not required.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tons/yr)
PM/PM10	002-Sandblasting	36.9[1]
	Sand Silo (Uncontrolled)	0.3[2]
	Total	**37.2**
VOC	001- Surface coating, rubber lining and painting	16.0
Total HAP	001- Surface coating, rubber lining and painting	16.0
Individual HAP (H169 Toluene)	001- Surface coating, rubber lining and painting	9.72

1. *Sand Blasting emissions were calculated based on a 900 tpy sand usage rate and using emissions factors from Stappa/Alapco permit handbook, Table 3-2.*
2. *Sand silo uncontrolled were calculated based on a 900 tpy sand loading rate and using the AP-42 emissions factor for cement contained in Table 11.12-2.*

V. 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.

VI. 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).