FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Specialty Maintenance and Construction, Inc.
Division of MetalTek International
4015 Drane Field Road
Lakeland, Florida 33811

Authorized Representative:
Mr. Kevin Hissem, Vice President

Air Permit No. 1050445-002-AC
Permit Expires: August 1, 2014
Specialty Maintenance and Construction Inc. – Plant 1
Minor Air Construction Permit
Permitting of an Existing Facility and Expansion

This is the final after-the-fact air construction permit is for an existing metal fabrication facility, which authorizes the permittee to operate its existing facility and expand the current operations by installing a new spray booth and expand the size of the existing spray booth and the abrasive blasting enclosure. The proposed work will be conducted at the existing Specialty Maintenance and Construction Inc. – Plant 1, which is a fabrication structural metal facility categorized under Standard Industrial Classification No. 3441. The facility is located in Polk County at 4015 Drane Field Road in Lakeland, Florida. The UTM coordinates are Zone 17, 399.0 kilometers (km) East, and 3097.5 km North.

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

_____ _____

Kelley M. Boatwright 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.

Kevin Hissem, Vice President, SMCI, khissem@smci-inc.com

Jack Lilley, Corporate Technical Director, MetalTek, jack.lilley@metaltek.com

Charles Leiter, EHS Director, SMCI, cleiter@smci-inc.com

Frank J. Burbach, P.E., ENVIRON, fburbach@environcorp.com

David Seitz, David Seitz, dseitz@environcorp.com

Rhonda Hughes, SWD Air, (rhonda.hughes@dep.state.fl.us)

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.

_____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

MetalTek International acquired Specialty Maintenance and Construction, Inc. (SMCI) on December 1, 2012. SMCI is an existing metal fabrication facility, which is located in Polk County at 1405 Drane Field Road in Lakeland, Florida. The existing facility has been in operation since 1977 and consists of the following operations: welding and support for fabrication; abrasive blasting; paint facilities; and machining and metal cutting equipment. Emission units identified at this facility include: a Surface Coating Operation (EU 001), which consist of two spray booths (Nos. 1 and 2) and a Nuclear Embed Area; and an Abrasive Blasting Operation (EU 002).

{Permitting Note: This facility is regulated under NESHAP Subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, of 40 Code of Federal Regulations (CFR) 63, which has not yet been adopted by the state of Florida Department of Environmental Protection rules. The welding operation is exempt from permitting in accordance with Rule 62-210.300(3)(a), F.A.C.}

Project Description and Proposed Emission Units

This is an after-the-fact permit for an existing operation and proposed expansion of a metal fabrication facility. The permittee is requesting to install/expand and operate the following processes and equipment:

1. Spray Booth No. 1 is an existing 20-foot wide, 44-feet in length and 16-feet in height non-pressurized cross draft booth with double bi-fold filtered doors. As part of this project the existing spray booth will be expanded to approximately 64-feet in length.
2. Spray Booth No. 2 will be a new Global Finishing Solutions (or equivalent) galvanized spray booth. The spray booth will be approximately 20-feet wide, 44-feet in length and 16-feet in height non-pressurized cross draft booth with double bi-fold filtered doors equipped with bridge style exhaust filters.
3. Nuclear Embed Area is an existing manual roll coat painting area that utilizes, if required, a conveyor belt to transport the stainless steel mounting plates.
4. The existing abrasive blasting enclosure is 35-feet wide, 28-feet in length and 19-feet in height. The applicant is proposing to expand the existing enclosure to approximately 42-feet in length. In conjunction with the expansion of the abrasive blasting enclosure, the applicant is proposing to install a PNEUMAFIL, ParaFlo Pro (or equivalent) horizontal cartridge dust collector to control the emissions of particulate matter (PM). The general design specifications for the dust collector are:
    a. Flow rate of approximately 35,000 acfm;
    b. 75 hp blower;
    c. Automatic cartridge pulse-clean control system;
    d. 99.8% control for particles > 0.5 microns;
    e. 97.5% or greater for a pressure differential of two-inches of water column, and
    f. Achieve an outlet concentration of 0.001 to 0.004 grains/dry standard cubic feet.

To control emissions of PM, the spray booth exhausts are equipped with filters and the abrasive blasting enclosure will be equipped with a dust collection system. Hazardous air pollutants (HAP), Volatile organic compounds (VOC) and/or organic solvent emissions are controlled by material usage limitations, work practice requirements and dispersion of emissions. Recordkeeping and reporting are used to document compliance with emission limitations.

This project will consist of the following emissions units.

Facility ID No. 1050445	
EU No.	**Emission Unit Description**
001	Surface Coating Operations
002	Abrasive Blasting Operations

{Permitting Note: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.}

FACILITY REGULATORY CLASSIFICATION

- The facility not a major source of HAP.
- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility is a synthetic non-Title V source for the pollutant HAP. The HAP emissions limitation and restriction on amount of material processed in this permit will ensure that the facility's HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

Project 1050445-001-AC was submitted on 12/11/2012 and withdrawn on 12/20/2012.

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: 813-632-7600

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 and Enforcement Section - Attention: AIR. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance and Enforcement Section – Attention: AIR
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

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. Application for Non-Title V Air Operation Permit - This permit authorizes construction or 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 units. 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. 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 Florida Department of Environmental Protection 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. a copy of the initial compliance test reports required by Specific Condition B.4., if not previously submitted; and

d. copies of the most recent month of records/logs specified in Specific Condition Nos. A.8. and B.12.

The application shall be submitted to the Permitting Authority.
[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), 62-210.370(3) and 62-210.900, F.A.C.]

FACILITY-WIDE SPECIFIC CONDITIONS

9. Unconfined Particulate Matter (PM). No person shall cause, let, permit, suffer or allow the emissions of unconfined PM from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined PM at this facility include:

a. paving and maintenance of roads, parking areas, and yards;

b. application of water or non-hazardous chemicals to control emissions from such activities as demolition of buildings, grading roads, construction and land clearing;

c. application of water or non-hazardous chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities;

d. removal of PM from roads and other paved areas to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne;

e. use of hood, fans, filters, and similar equipment to contain, capture and/or vent PM;

f. confine abrasive blasting, where possible; and,

g. enclosures or covers on conveyor systems.

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

10. Fugitive VOC/Organic Solvents (OS) - The permittee shall not store, pump, handle, process, load, unload, or use in any process or installation, VOC/OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

a. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials.

b. All VOC/OS from equipment clean-up shall be directed into containers that prevent evaporation into the atmosphere.

c. Tightly cover or close all VOC and/or solvent containers when they are not in use.

d. Prevent excessive air turbulence across exposed VOCs.

a. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1), F.A.C.]

{Permitting Note - This condition implements Item 6 in Section 4, Appendix C (Common Conditions).}

A. EU 001 - Surface Coating Operations

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

EU No.	Emission Unit Description
001	Surface Coating Operations

This emission unit will consists of two drive-in spray booths, an existing Spray Booth (No. 1) and a new Spray Booth (No. 2), and an existing Nuclear Embed Area. Both spray booths are non-pressurized, cross draft booths with filtered doors. Coating application equipment includes high-volume, low pressure, conventional pressure pot air spray, and manual roller coating. The Nuclear Embed Area prefabricates structural and stainless steel mounting plates that are embedded in poured concrete structures at construction sites. These embed plates are fabricated by a stud welding process and painted, if required on a dedicated assembly line. Embed plates are painted on the side (top) and edges by roller application.

Emissions of PM are controlled in the spray booths by a double array of dry filter media located prior to each exhaust stack. VOC emissions from the Nuclear Embed Area are emitted into a paint enclosure located in an open-sided lean-to-shed attached to the east side of the south shop building.

Spray Booth No. 1 has a single exhaust stack that is 28-feet in height and four-feet in diameter. Exhaust gases exit the stack with a volumetric flow rate at approximately 30,000 actual cubic feet per minute (acfm). Spray Booth No. 2 has a single exhaust stack that is 31-feet in height and four-feet in diameter. Exhaust gases exit the stack with a volumetric flow rate at approximately 32,000 acfm.

{Permitting Note: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required.}

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation - This emissions unit may operate continuously (8,760 hours/year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.2. Circumvention of Emission Control Equipment – The spray booth filters shall be in service and operating properly during all period of operating the spray booths.

EMISSIONS STANDARDS

A.3. VOC Emissions – The emissions of VOC shall not exceed 24 tons per any consecutive 12-month period.
[Permit Application dated 2/7/2013; Rule 62-210.200 (PTE), F.A.C.]

A.4. Individual HAP Emissions – The emissions of any individual HAP shall not exceed 9.9 tons per any consecutive 12-month period.
[Permit Application dated 2/7/2013; Rule 62-210.200 (PTE), F.A.C.]

A.5. Total HAPs Emissions – The emissions of Total HAPs shall not exceed 24.9 tons per any consecutive 12-month period.
[Permit Application dated 2/7/2013; Rule 62-210.200 (PTE), F.A.C.]

NOTIFICATION REQUIREMENTS

A.6. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of EU No. 001, no later than 15 days after that date. Commencing operation means setting into operation of any part of an emissions unit for any purpose.
[Rules 62-4.070 and 62-210.200 (Definition of Commence Operation), F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.7. Monthly Log - The permittee shall keep monthly logs to document compliance with VOC and HAP limitations of Specific Condition A.3. – A.5. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. At the option of the permittee, "purchases" may be used instead of "usage" in determining amount of coating used and the VOC/HAP emissions, provided that no material is used that was not purchased. At a minimum, the logs shall contain the following:

a. Facility name, facility ID No., emission unit ID No., and description (i.e., SMCI, 1050445, EU 001, Surface Coating Operation).

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

1. VOC Monthly Records

a. The quantity (gallons) and VOC content (pounds/gallon) of each VOC-containing material (surface coatings and solvents) used for the month.

b. The calculated monthly total VOC emissions, in tons.

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

2. HAP Monthly Records

a. The quantity (gallons) and HAP content (pounds/gallon) of each HAP-containing material (surface coatings and solvents) used for the month.

b. The calculated monthly HAP emissions for each individual HAP, in tons.

c. The calculated monthly HAP emissions for total HAPs, in tons.

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

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

{Important Permitting Note: The individual HAP and Total HAPs emissions limits of Specific Condition Nos. A.4. and A.5. are very close to the Title V thresholds of 10 tons/year and 25 tons/year. Please be aware that if either of the Title V thresholds are exceeded, the facility will become a Title V facility and will be required to obtain a Title V permit.}

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. Supporting documentation (Material Safety Data Sheet (MSDS) sheets, purchase orders, emission factors, etc.) shall be kept for each VOC and HAP containing material.
[Rule 62-4.070(3), F.A.C.]

B. EU No. 002 – Abrasive Blasting Operations

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
002	Abrasive Blasting Operations

The abrasive blasting operation is enclosed and is used to prepare metal components (primarily ferrous metals) for painting and assembly. Blast media includes, but is not limited to, silica and non-silica sand, glass beads and other materials that contain or have the potential to emit metal fabrication HAP particulate matter (PM).

Emissions of PM will be controlled by a 75 horse power (hp) PNEUMAFIL, ParaFlo Pro (or equivalent) cartridge dust collection system. The exhaust stack is 30 feet in height and 3.5 feet in diameter. Exhaust gases exit the stack with a volumetric flow rate of approximately 35,000 acfm.

{Permitting note: This emissions unit is regulated under NESHAP - 40 CFR 63, Subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, which has not been adopted by the state of Florida Department of Environmental Protection rules.}

PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity - The blast material throughput shall not exceed 1,800 tons per any consecutive 12-month period.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.2. Hours of Operation – This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C.]

EMISSION STANDARDS

B.3. Visible Emissions Limitation – To ensure the dust collector is properly maintained and operated, visible emissions (VE) from the exhaust of the abrasive blasting enclosure shall not exceed 5% opacity.
[Rules 62-4.070(3) and 62-296.320(4)(b)1., F.A.C.]

COMPLIANCE TESTING REQUIREMENTS

B.4. Initial Compliance Tests - The emission unit shall be tested for visible emissions to demonstrate initial compliance. The initial compliance test must be conducted within 90 days after initial operation of the unit.
[Rules 62-4.070(3) and 62-297.310(7)(a)1., F.A.C.]

B.5. VE Compliance Tests After Initial Testing - During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested for VE to demonstrate compliance with the limitation of Specific Condition No. B.3.
[Rule 62-297.310, F.A.C.]

B.6. Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

B.7. Compliance Test Methods: Required tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.
[Rule 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

B.8. Operation Rate During Testing – Testing of emission to show compliance shall be conducted under normal operating conditions. The actual blasting rate (in tons/hour) for the test period shall be included in the test report for each test. Failure to submit the actual blasting rate for the test period and a copy of the daily log for the test day in the test report may invalidate the test and fail to provide reasonable assurance of compliance.
[Rules 62-4.070(3) and 62-297.310(2), F.A.C.]

NOTIFICATION REQUIREMENTS

B.9. Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

{*Permitting Note - The notification should also include the relevant emission unit ID No., test method to be used, and pollutant to be tested.*}

B.10. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of EU No. 002, no later than 15 days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070 and 62-210.200 (Definition of Commence Operation), F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

B.11. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

B.12. Monthly Log - The permittee shall keep monthly logs to document compliance with the throughput limitation in Specific Condition B.1. At the option of the permittee, "purchases" may be used instead of "usage" in determining sand throughput, provided that no material is used that was not purchased. The logs shall include the following for each calendar month:

a. Facility name, facility ID No., EU No., and description (i.e., SMCI, 1050445, EU 002, Abrasive Blasting Operation).
b. The monthly amount of the material used in abrasive blasting operation, in tons.

c. A cumulative total amount of material used 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. [Rule 62-4.070(3), F.A.C.]