FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Southeastern Construction and Maintenance, Inc.
1150 Pebbledale Road
Mulberry, FL 33860

Authorized Representative:
Mr. Steven Howell, Sr. Vice President

Air Permit No. 1050451-001-AC
Permit Expires: 02/01/2015
Minor Air Construction Permit
Project: After-the-fact Construction Permit

This is the final after-the-fact air construction permit for a steel fabrication and industrial construction and maintenance facility. The work is conducted at Southeastern Construction and Maintenance, Inc. (Standard Industrial Classification No. 3441). The facility is located in Polk County at 1150 Pebbledale Road in Mulberry, Florida. The UTM coordinates are Zone 17, 405.64 km East, and 3079.35 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

Kelley M. Boatwright 06/12/2014
Kelley M. Boatwright Effective Date
Permitting and Waste Cleanup 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.

Steven Howell, Sr. Vice President
Southeastern Construction and Maintenance, Inc.
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Dale C. Konas, P.E.
EnviroTrac Ltd., 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.

Rhonda Hughes 6/12/2014
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Project Description and Proposed Emission Units

This existing facility designs, fabricates, paints, assembles/constructs, repairs and maintains equipment, components, and structures made from carbon steel according to client contract specifications. This project will create the following emission units (EUs).

Facility ID No. 1050451

EU ID No.	Emissions Unit Description
001	Sand Blasting Operations
002	Shot Blasting Operations
003	Surface Coating Operations

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

Exempt Emission Sources/Activities

- Two 25 ton capacity sand storage silos. Emissions from each sand storage silo are vented through a 4" elbow located at the top of each silo. Sand is decanted from the bottom of the silos into conveyable sand pots. There is a compressed air supply tank which is electrically powered. The sandblasting operation (EU 001) permit limit of 854 tons of sand per any consecutive 12-month period directly limits the throughput of the sand silos.

  [Rule 62-210.300(3)(b)1, F.A.C. *(Generic Emissions Unit or Activity Exemption)*]

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 less than 10 microns (PM_{10}), volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The emission limitations, restriction on the type or amount of material or processed in this permit will ensure that the facility's PM_{10}, VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit is the initial air construction permit for this facility.

ADMINISTRATIVE REQUIREMENTS

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

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
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. Application for Non-Title V Air Operation Permit - This permit authorizes the after-the-fact construction 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. 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.3., B.4., and C.3.

The application shall be submitted to the Permitting Authority.

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

FACILITY-WIDE SPECIFIC CONDITIONS

9. Restricted 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.]

10. Volatile Organic Compound Emissions and/or Organic Solvent Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (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. tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use;

c. immediately confine and clean up VOC and/or solvent spills, and make sure wastes are placed in closed containers for reuse, recycling or proper disposal; and

d. used cleanup solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations.

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

11. Unconfined Emissions of Particulate Matter - No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter 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 include the following:

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

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

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

d. removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne; and

e. landscaping or planting of vegetation.

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

A. EU No. 001 Sandblasting Operations

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

EU ID No.	Emissions Unit Description
001	Sandblasting Operations – The surfaces of raw steel and fabricated parts are prepared for surface coating using washed and sieved natural silica sand. The exterior sand blasting area is approximately 2,900 ft^2 in area and contains two 25 ton sand storage silos. Sand is decanted from the bottom of the silos into conveyable sand pots. Using compressed air from a portable compressor (electrically powered), the sand propellant is extracted from the pots and is conveyed through two high pressure lines and nozzles.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity – The sand throughput is limited to 854 tons per any consecutive 12-month period. [Rule 62-210.200 ("Potential to Emit"), F.A.C.; as requested in construction permit application received 4/17/2014]

A.2. Unconfined Emissions of Particulate Matter –Reasonable precautions shall be taken to control emissions of unconfined particulate matter resulting from sandblasting operations *(also see Specific Condition No. 11)*. Reasonable precautions for this emissions unit shall include the following:

a. install and maintain a wind direction and velocity measuring device in the vicinity of the sandblasting operations that will alert the operator when unfavorable wind conditions are occurring;

b. cease operations if a wind speed of 15 miles per hour is observed for 5 minutes; and

c. apply water if necessary to control airborne particulate matter not directly associated with sandblasting operations.

In order to provide reasonable assurance that the precautions and practices taken are adequate, visible emissions at the property boundary should not exceed 5 percent opacity. Exceedance of this limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary.

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

RECORDKEEPING

A.3. Monthly Log - The permittee shall keep monthly logs to document compliance with the throughput limitations of Specific Condition No. A.1. The logs shall include the following for each calendar month:

a. facility name, facility ID No., emission unit No., and description (i.e., Southeastern Construction and Maintenance, Inc., 1050451, EU No. 001, Sandblasting Operations);

b. month/year;

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

d. total amount of sand used (tons/ consecutive 12-month period) 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 be made available to the Department upon request.

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

B. EU No. 002 Shot Blasting Operations

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

EU ID No.	Emissions Unit Description
002	Shot Blasting Operations – The surfaces of raw steel and fabricated parts are prepared for surface coating using metal shot. The pieces to be prepared are conveyed into the metal shot blasting area on the northeast end of a 21,000 ft^2 roofed open air structure. The conveyor moves the part through strips of plastic sheeting upon entry and exit of the Pangborn shot blast machine. The surfaces are shot using Metaltec Steel Abrasive Co. low and high carbon steel shot. The shot is reused until abrasive efficiency of the shot no longer allows for viable abrasion. Emissions from shot blasting activities are controlled by a Donaldson Torit Downflo Cartridge System Dust Collector which also provides negative pressure to the area between the plastic sheeting where the shot blasting is being conducted. The air is discharged through an additional HEPA filter located adjacent to the unit approximately one foot off the floor. The dust filtered by the cartridges falls into a collection drum at the bottom of the unit. The collected dust is sent to a scrap metal recycling facility for processing.

PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity – The steel shot throughput is limited to 97 tons per any consecutive 12-month period.

(Permitting Note: The steel shot throughput includes the amount that is reused.)

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; as requested in construction permit application received 4/17/2014]

B.2. Visible Emissions Indicator - To ensure the dust collector is properly maintained and operated, visible emissions (VE) from the abrasive blasting enclosure should not exceed 5% opacity. Exceedance of this limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary.
[Rules 62-4.070(3) and 62-210.650, F.A.C.]

B.3. Unconfined Emissions of Particulate Matter - Reasonable precautions shall be taken to control emissions of unconfined particulate matter resulting from shot blasting operations *(also see Specific Condition No. 11.)*. Reasonable precautions for this emissions unit shall include inspecting the enclosure around the Pangborn unit monthly and repairing it if necessary.
[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

RECORDKEEPING

B.4. Monthly Log - The permittee shall keep a monthly log to document compliance with Specific Condition Nos. B.1. and B.3. The logs shall include the following for each calendar month:

a. facility name, facility ID No., emission unit No., and description (i.e., Southeastern Construction and Maintenance, Inc., 1050451, EU No. 002, Shot Blasting Operations);

b. amount of steel shot used in shotblasting operations (tons/month);

c. total amount of steel shot used (tons/year) for the most recent consecutive 12-month period; and

d. date of enclosure inspection with initials of operator performing the inspection.

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 be made available to the Department upon request.

(Permitting Note: The amount of steel shot used (see subparagraph B.4.b., above), includes the amount that is reused.)

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

C. EU No. 003 Surface Coating Operations

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

EU ID No.	Emissions Unit Description
003	Surface Coating Operations Outdoor Surface Coating Area - Fabricated parts are placed on steel I-beam racks and are open air sprayed by hand. The spray area is approximately 29,000 ft^2. Emissions are fugitive in nature. Covered Surface Coating Area – Fabricated parts are placed on steel I-beam racks and are sprayed by hand within the confines of a 21,000 ft^2 roofed open air structure (shared with the shot blasting area). Emissions are fugitive in nature.

PERFORMANCE RESTRICTIONS

C.1. Unconfined Emissions of Particulate Matter –Reasonable precautions shall be taken to control emissions of unconfined particulate matter resulting from surface coating operations *(also see Specific Condition No. 11.)*. Reasonable precautions for this emissions unit shall include curtail painting operations during unfavorable wind conditions.

In order to provide reasonable assurance that the precautions and practices taken are adequate, visible emissions at the property boundary should not exceed 5 percent opacity. Exceedance of this limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary.

(Permitting Note: Outdoor sand blasting and outdoor surface coating operations occur in the same area. The wind measuring device specified in Specific Condition No. A.2. will provide wind conditions for both of these operations.)

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

EMISSIONS STANDARDS

C.2. Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emission Limitations – Emissions of VOC, individual HAPs and total HAPs from surface coating and cleanup solvent operations shall not exceed the following:

Pollutant	Emission Limit (tons per any consecutive 12-month period)
VOC	43.0
Any individual HAP	8.0
Total HAPs	24.0

[Rule 62-210.200, F.A.C. ("Potential to Emit"); as requested in construction permit application received 4/17/2014]

RECORDKEEPING

C.3. VOC and HAP Recordkeeping - The permittee shall keep monthly logs to document compliance with the VOC and HAP limitations of Specific Condition No. C.2. 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 VOC/HAP emissions, provided that no materials are used which are not purchased. The monthly logs shall include, but not be limited to, the following information:

a. facility name, facility ID No., emission unit ID No., and description (i.e., Southeastern Construction and Maintenance, Inc., 1050451, EU No. 003, Surface Coating Operations);

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

c. percentage (%) by weight of VOC and each individual HAP for each surface coating and solvent material;

d. monthly total quantity, in gallons, of each surface coating and solvent material used (solvent total is total minus amount collected for recycle or disposal);

e. monthly total of VOC emissions (tons/month) based on c. and d. above;

f. most recent consecutive 12 -month period cumulative total VOC emissions (tons/consecutive 12 - month period) from surface coating and solvent material based on e. above;

g. monthly total of individual and total HAP emissions (tons/month) based on c. and d. above; and

h. most recent consecutive 12-month period cumulative total of individual and total HAP emissions (tons/consecutive 12-month period) from surface coating and solvent materials based on i. above.

The monthly logs 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 (MSD sheets, purchase orders, emission factors, etc.) shall be kept for each VOC and HAP containing material.
[Rule 62-4.070(3), F.A.C.]