



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

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LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Allen Industries, Inc.
11351 49th Street North
Clearwater, Florida 33762

Air Permit No. 1030186-008-AO
Permit Expires: 3/24/2019
Minor Air Operation Permit
Operation Permit Renewal

Authorized Representative:
Mr. Ray Ryals, Vice President – Manufacturing

This is the final permit to renew Air Operation Permit No. 1030186-007-AO for a surface coating and fabrication plant for sign materials (Standard Industrial Classification No. 3993) located in Pinellas County at 11351 49th Street North in Clearwater, Florida. The UTM coordinates are Zone 17, 332.72 km East, and 3084.54 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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this final permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or

modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this final permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida


Kelley M. Boatwright
District Air Program Administrator
Southwest District

03/24/2014
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.

Mr. Ray Ryals, Vice President – Manufacturing, Allen Industries, Inc. (ray.ryals@allenindustries.com)

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

Mr. Sherrill Culliver, Environmental Program Coordinator – Pinellas County Air Quality Division (sculliver@co.pinellas.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)

3/24/2014
(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility is a surface coating and fabrication plant for sign materials. The existing facility consists of the following emissions unit (EU).

Facility ID No. 1030186	
EU ID No.	Emissions Unit Description
004	Surface Coating Operations

***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 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 pollutant(s) Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). The emission limitations in this permit will ensure that the facility's VOC and HAPs emissions will be below the threshold for a Title V source.

(Federal NESHAP Applicability Note - This facility could be subject to Federal NESHAP 40 CFR 63 Subpart HHHHHH (National Emissions Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources), if the coatings used at the facility contain the targeted HAPs of Chromium (Cr), nickel (Ni), cadmium(Cd), or lead(Pb) at a concentration >0.1%, or Manganese (Mn) at a concentration > 1.0%, or use MeCl as a chemical stripper. Based upon supplemental information submitted as part of the application for this permit, the permittee has determined that they do not use any coatings containing the targeted HAPs, and are therefore currently not subject to this Federal NESHAP.)

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1030186-007-AO.

**SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS
(FINAL)**

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 - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida 33756
Telephone: 727-464-4422

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.]

**SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS
(FINAL)**

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 with a copy to the Pinellas County Air Quality Division (Compliance 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.; and
 - c. copies of the most recent month of records/logs specified in Specific Condition Nos. A.7. and A.8.
- [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. General Pollutant Emission Limiting Standards: Objectionable Odor Prohibited - The permittee shall not cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "Objectionable Odor" is defined as any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rules 62-210.200 (Definition of Objectionable Odor), and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 004 – Surface Coating Operations

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

EU ID No.	Emissions Unit Description
004	<p><u>Surface Coating Operations</u> – Three (3) Indoor Paint Spray Booths (Booths Nos. 1, 2, and 5); and an Outdoor Painting Area.</p> <p>Of the three (3) <u>indoor paint spray booths</u>, Booths Nos. 1 and 5 are used for metal parts and are located on the North side of the building. Booth No. 2 is used to handle plastic parts and is located on the South side of the building. All three booths are from Autek Spray Booths, Inc.</p> <p>These booths are used interchangeably to paint metal sign parts, to apply masking material with zero VOC emissions, and to apply paint to the plastic faces of commercial signs. The painting of the metal sign parts is subject to the restrictions of the VOC RACT (3.5 pounds VOC per gallon of coating, less water and exempt solvents). Equipment clean up is performed in a modified sink, which drains solvents into a sealed 5-gallon can. Solvents are poured, not sprayed. Vapors are exhausted from the booth through a filter-equipped ventilation system.</p> <p>The outdoor painting area is used for painting both plastic faces of commercial signs and metal sign structural parts. The painting of the metal sign parts is subject to the VOC RACT (3.5 pounds per gallon of coating, less water and exempt solvents). Lacquer thinner is used for surface preparation. Paints are applied with disposable brushes.</p>

PERFORMANCE RESTRICTIONS

- A.1. Restricted Operation - The hours of operation for this emissions unit are continuous (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200(Definition of Potential to Emit), F.A.C.; Construction Permit No. 1030186-006-AC]
- A.2. Spray Booth Overspray Filters - The permittee shall not circumvent the paint spray booth air pollution control equipment (booth fiber filters on the ventilation systems to control paint overspray) or allow the emission of air pollutants without this equipment operating properly. In order to provide reasonable assurance the overspray control systems are adequately controlling emissions of uncontrolled particulate matter from the spray booths, visible emissions from the paint spray booth exhausts should not exceed 5% opacity. Exceedance of the 5% limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices (filter maintenance or replacement) may be necessary.
[Rules 62-4.070(3), and 62-210.650, F.A.C.; Construction Permit No. 1030186-006-AC]

EMISSIONS STANDARDS

- A.3. VOC and HAP Emission Limitations – In order to establish the facility as a non-Title V minor source of VOC and HAP emissions, the following maximum allowable VOC and HAP emission limitations shall apply to the surface coating operations of EU No. 004:

Pollutant(s)	Emission Limitations (maximum tons/consecutive 12 month period)
Total Volatile Organic Compounds (VOC)	48.0

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 004 – Surface Coating Operations

Any Individual Hazardous Air Pollutant (HAP)	9.0
Total Hazardous Air Pollutants (HAPs)	20.0

[Rule 62-210.200(Definition of Potential to Permit), F.A.C., Construction Permit No. 1030186-006-AC]

(Title V Applicability Note: Based on the above limitation, total facility HAP emissions will not emit the Title V major source threshold of 25 tons per year or more of any combination of HAPs. Any increase in individual HAP emissions, which results in emissions of 10 tons per year or more of any one HAP will require an application for a Title V operation permit.)

A.4. VOC Reasonably Available Control Technology (RACT) Coating Limitations for Metal Surface Coating - In accordance with Rule 62-296.513, F.A.C. (VOC RACT - Surface Coating of Miscellaneous Metal Parts and Products), when surface coating/painting metal parts or products the permittee is limited to the use of coatings/paints with a volatile organic compound (VOC) content not to exceed 3.5 pounds VOC per gallon of coating, less water and exempt solvents. Emissions from solvent washings shall be included in the above limitation unless the wash solvent is directed into containers that prevent vapor loss to the atmosphere.

[Rules 62-296.500(4), 62-296.513(2)(a)2 and 62-296.513(2)(c), F.A.C.]

A.5. General Pollutant Emission Limiting Standards – Fugitive Volatile Organic Compound (VOC) or Organic Solvents (OS) Emissions - The permittee shall not store, pump, handle, process, load, unload, or use in any process or installation, OS, or VOCs without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The permittee shall comply with the following:

- 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 washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.
- c. Tightly cover or close all VOC containers when they are not in use.
- d. Prevent excessive air turbulence across exposed VOCs.
- e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.
- f. Solvents from paint gun pot cleaning shall be considered to have negligible emissions only if they are directed by pouring into closed containers.
- g. Clean-up solvents are not required with the use of disposable brushes.

[Rule 62-296.320(1), FAC; Construction Permit No. 1030186-006-AC]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.6. Coating VOC Content Determination - Compliance with Specific Condition Nos. A.3. and A.4. shall be determined based the VOC content of each coating being applied using EPA Method 24 or 24A contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. Certification under EPA 450/3-84-019, if properly completed for each affected coating, may be submitted in lieu of the EPA Method 24 or 24A tests. New coatings or the same coatings supplied by a different manufacturer shall be tested for VOC content using EPA Method 24, 24A, or the above mentioned certification test method prior to use. For use of coatings different from those included in previous permit applications (i.e., new

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 004 – Surface Coating Operations

coatings or coatings supplied by a different manufacturer), submit the new coating(s) test results to the Permitting and Compliance Authorities within 30 days of initial use. The permittee shall maintain records of VOC content of all coatings used in a form suitable for inspection and make them available to the Permitting Authority or Compliance Authority upon request.

[Rule 62-296.513(4) and Chapter 62-297, F.A.C.; 40 CFR 60 Appendix A; Construction Permit No. 1030186-006-AC]

- A.7. Surface Coating VOC Recordkeeping Requirements** - In order to document continuing compliance with the volatile organic compound (VOC) emission limitations of Specific Condition Nos. A.3 and A.4., the permittee shall maintain, at a minimum, the following records for surface coating operations:
- a. Daily RACT Records for Metal Surface Coating Operations – In accordance with Rule 62-296.500(2)(b) (VOC RACT Recordkeeping Requirements), F.A.C., the permittee shall maintain daily logs which shall include but not be limited to the following information:
 1. the applicable rule (i.e., Rule 62-296.513(2)(a)2. and 62-296.513(3), F.A.C.);
 2. facility name and Facility ID (i.e., Allen Industries, Inc., Facility ID 1030186);
 3. the substrate type being coated (i.e., metal);
 4. the emission unit number and description of specific location of application (i.e., EU No. 004, Spray Paint Booth No. 1, 2, or 5; or outdoor painting area);
 5. date (month, day, year);
 6. on a daily basis, what "As Applied" coating (by identification number) was used, indicating the amount of each used in gallons or pounds;
 7. on a daily basis, all other VOC and solvents used for surface preparation, clean-up, and wash-up, indicating the amount of each used in gallon or pounds;
 8. on a daily basis, calculate the amount of emissions from the wash solvents (equipment clean-up) that are not directed into containers that prevent evaporation into the atmosphere for disposal (pounds); and
 9. the VOC content as applied (pounds VOC per gallon of coating as applied) for each type of coating utilized.
 - b. Monthly VOC Records for All Surface Coating Operations – In order to show compliance with the VOC emission limitation of Specific Condition No. A.3., the permittee shall maintain monthly records for all VOC containing materials associated with the surface coating operations. The records shall contain, at a minimum, the following for the month:
 1. General Record Identification:
 - i. facility name and Facility ID (i.e., Allen Industries, Inc., Facility ID 1030186);
 - ii. the emission unit (i.e., EU No. 004); and
 - iii. month and year of the record.
 2. For each coating:
 - i. name/description of coating;
 - ii. VOC content of coating (percent by weight if usage recorded in pounds or lbs/gallon coating, excluding water, as applied, if usage recorded in gallons); and

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 004 – Surface Coating Operations

- iii. the quantity of coating used/month (pounds or gallons).
3. For each VOC containing solvent used for surface cleaning or equipment clean-up used:
 - i. name/description of solvent;
 - ii. VOC content of solvent (percent by weight if usage recorded in pounds or lbs/gallon if usage recorded in gallons); and
 - iii. the quantity of solvent used/month (pounds or gallons).
4. The calculated (based upon coating/solvent VOC content and usage) total VOC emissions for:
 - i. each coating and solvent (pounds/month); and
 - ii. the entire surface coating operation (pounds/month); and
 - iii. cumulative VOC emissions for the most recent consecutive 12-month period (tons/12 consecutive month period).

[Rules 62-4.070(3), 62-296.500, and 62-296.513, F.A.C.; Pinellas County Code 58-90; Construction Permit No. 1030186-006-AC]

A.8. HAP Recordkeeping Requirements - In order to document compliance with the hazardous air pollutant (HAP) limitations of Specific Condition No. A.3., the permittee shall maintain monthly records for all HAP containing materials* associated with the surface coating operations. (**This includes, but is not limited to, paint, inks, coating, thinner, solvents and other material used in the surface coating operations which contain HAPs.*)

- a. The records shall contain, at a minimum, the following for the month:
 1. General Record Identification:
 - i. facility name and Facility ID (i.e., Allen Industries, Inc., 1030186);
 - ii. the emission unit (i.e., EU No. 004); and
 - iii. month and year of the record.
 2. For each HAP containing coating or solvent used:
 - i. name/description of coating or solvent;
 - ii. HAP content of coating (as applied) or solvent (percent by weight if usage recorded in pounds or lbs/gallon if usage recorded in gallons) for each individual HAP contained in the coating or solvent;
 - iii. the quantity of coating or solvent used/month (pounds or gallons).
 3. The calculated (based upon coating/solvent HAP content and usage) HAP emissions for each individual HAP from:
 - i. each coating and solvent (pounds/month) and
 - ii. the entire surface coating operation (pounds/month).
 4. A calculation of the following:

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 004 – Surface Coating Operations

- iii. cumulative HAP emissions for each individual HAP and total HAPs for the most recent consecutive 12-month period (tons/12 consecutive month period).

[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90/94; Construction Permit No. 1030186-006-AC]

A.9. VOC and HAP Record Documentation and Maintenance Requirements – The following requirements apply to the VOC and HAP records required in Specific Condition Nos. A.7. and A.8. above.

- a. The records shall include paint, inks, coating, thinner, solvents and other material used in the surface coating operations which contain VOCs or HAPs.)
- b. Supporting documentation (e.g., MSDS sheets, “As Supplied” sheets, “As Applied” sheets, purchase orders, inventory records, production records, etc.) for the records required above, which shall include sufficient information to determine VOC and HAP emissions, shall also be kept. At the permittee’s option, “quantity purchased” may be reported to satisfy the requirement of “quantity used”, provided no materials are used which are not purchased. The records shall specify the method used for emission determination (i.e., material purchased or used).
- c. Documentation of solvents consumed, such as during spray paint gun/hose cleanup, may use a mass balance method to determine usage (amount used minus amount collected for disposal or recycle).
- d. Daily Records shall be completed within five (5) calendar days. Monthly records shall be completed within 15 days of the end of the month.
- e. The records required in this permit shall be maintained at the facility for a minimum of three (3) years (except where otherwise specified) and made available to the Permitting Authority or Compliance Authority upon request.

[Rules 62-4.070(3) and Chapter 62-296, F.A.C.; Pinellas County Code 58-90; Construction Permit No. 1030186-006-AC]