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

JONATHAN P. STEVERSON
SECRETARY

FINAL PERMIT

PERMITTEE

AgriFleet Leasing Corporation
100 Thornhill Road
Auburndale, FL 33823

Air Permit No. 1050351-006-AO
Permit Expires: 02/09/2020
Minor Air Operation Permit
Project: Operation Permit Renewal

Authorized Representative:
Mr. Darren Swander, Vice President of Operations

This is the final permit to renew Air Operation Permit No. 1050351-005-AO for a sandblasting and surface coating operation (Standard Industrial Classification No. 7519). The facility is located in Polk County at 100 Thornhill Road in Auburndale, Florida. The UTM coordinates are Zone 17, 419.9 km East, and 3103.3 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

for

Kelley M. Boatwright
Permitting & Waste Cleanup
Program Administrator
Southwest District

02/09/2015
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.

Darren M. Swander, AgriFleet Leasing Corporation (darren@agrifleet.com)

Merry Vardeh, AgriFleet Leasing Corporation (mbvardeh@agrifleet.com)

Steven Tafuni, FDEP (Steven.Tafuni@dep.state.fl.us)

Danielle Henry, FDEP (Danielle.D.Henry@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.

Rhonda Hughes
(Clerk)

02/09/2015
(Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is an existing sandblasting and surface coating facility. The existing facility consists of the following emissions units (EUs).

Facility ID No. 1050351

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

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 volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1050351-005-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 and Solid Waste Permitting Program. The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air_Permitting@dep.state.fl.us

All documents related to applications for permits shall be submitted to the above e-mail address and/or 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, phone number and e-mail address 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
E-mail: SWD_Air@dep.state.fl.us

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above e-mail address and/or 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 compliance test reports required by Specific Condition No. A.6., if not previously submitted;

   d. copies of the most recent month of records/logs specified in Specific Condition Nos. A.11., A.12., A.13. and B.4.

   [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. Unconfined Emissions of Particulate Matter – In addition to Condition 9. of Appendix C., the following reasonable precautions should be followed:

   a. All sandblasting equipment operations shall be conducted in the three-sided enclosed building with containment screening;

   b. All surface coating shall be conducted in the designated paint booth;

   c. The blower shall be operated at all times when the spray painting is conducted in the paint booth;

   d. If necessary, the speed of the vehicular traffic on the unpaved road will be regulated slower to a level minimizing the production of dust;

   e. If necessary, further vehicular traffic dust control requirements may include the periodic application of non-potable water to the unpaved road surface and keep records of such applications.

   [Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C; Construction Permit 1050351-003-AC]

10. Recordkeeping– Daily logs shall be completed within 5 business days. Monthly records shall be completed by the end of the following month. Supporting documentation (Material Safety Data Sheets, purchase orders, emission factors, etc.) shall be kept for each surface coating material, which includes sufficient information to

determine HAP and VOC emissions. All records required by this permit 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.]

A. EU No. 001 – Sand Storage Silo and Sandblasting

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

EU ID No.	Emissions Unit Description
001	*Sand Storage Silo and Sandblasting – The storage silo receives sandblasting material pneumatically by truck at a maximum rate of 32.0 tons per hour. Emissions from the sand storage silo are controlled by a Trinco "Deluxe" Model fabric filter (baghouse). The sand storage silo has a storage capacity of 32 tons. Emissions from the sandblasting operation are controlled by three-sided building with containment screening.*

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity – Sand Throughput – The sandblasting operation is limited to a maximum sand usage of 864 tons per any consecutive 12-month period.
[Construction Permit 1050351-003-AC]

A.2. Permitted Capacity – Silo Loading Rate – The maximum allowable loading rate permitted for the sand storage silo shall not exceed 32.0 tons/hour (see recordkeeping requirements in Specific Condition A.12.)
[Construction Permit 1050351-003-AC]

A.3. Hours of Operation – The sandblasting operation is limited to the maximum of 2,080 hours per any consecutive 12-month period.
[Construction Permit 1050351-003-AC]

EMISSIONS STANDARDS

A.4. Circumvention – No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable control device operating properly. In order to determine that the control device (baghouse) is operating properly, visible emissions shall not exceed 5%
[Rule 62-4.070(3) and 62-210.650, F.A.C.; Construction Permit 1050351-003-AC]

A.5. Visible Emissions Indicator – As an indicator the three-sided enclosed building is adequate, there shall be no visible emissions (5% opacity) emitted from the building. If visible emissions are emitted from the building, it will not be a violation in and of itself, but an indicator that additional controls and/or measures may be required.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050351-003-AC]

COMPLIANCE TESTING REQUIREMENTS

A.6. Visible Emissions Testing – In order to document compliance with Specific Condition No. A.4., the permittee shall test for visible emissions from the sand storage silo's baghouse annually during each federal fiscal year (October 1 – September 30).
[Rule 62-297.310(7)(a), F.A.C.]

A.7. 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.]

A.8. Compliance Test Method – Required compliance tests shall be performed in accordance with the following reference method.

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

The above method is described in Appendix A of 40 CFR 60 and is 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 and 62-297.100, F.A.C.; Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

A.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.
(*Permitting Note - The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.10. 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.]

A.11. Sand Throughput Recordkeeping – In order to demonstrate compliance with Specific Condition No. A.1., the permittee shall calculate the tons of sand received for the sandblasting operation monthly, and a consecutive 12-month total (in tons/year).
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050351-003-AC]

A.12. Silo Loading Rate Recordkeeping – The permittee shall record the following for the sand storage silo loading:

a. The amount of material transferred (in tons);

b. The start time of the material transfer;

c. The end time of the material transfer;

d. Calculate the material transfer rate (in tons/hour) using the above three items and record the transfer rate for compliance with the limit specified in Specific Condition No. A.2.

The above requirements of recording the silo loading rate are mandatory during the visible emissions testing only. However, if the most recent compliance test was conducted at less than the maximum permitted capacity (i.e., at less than 90% of 32.0 tons/hour which is 28.8 tons/hour), the silo loading rate recordkeeping is mandatory for each silo loading until a new test is conducted at 90-100% of the

permitted capacity. These testing requirements are in addition to Condition 1. requirements of Appendix D.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050351-003-AC]

A.13. Hours of Operation Recordkeeping – In order to demonstrate compliance with Specific Condition No. A.3., the permittee shall record the hours of operation weekly and monthly, and a consecutive 12-month total (most recent 12 months) in hours shall be maintained for compliance with the annual limit.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050351-003-AC]

B. EU No. 002 – Surface Coating

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

EU ID No.	Emissions Unit Description
002	*Surface Coating – Surface coatings are applied to sandblasted equipment. Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) from surface coating materials are emitted through a paint booth blower. The blower operates at approximately 35,000 cfm. Particulate matter emissions from the paint booth are controlled by filters placed in a filter panel at the front of the blower.*

PERFORMANCE RESTRICTIONS

B.1. Hours of Operation – The hours of operation are not limited (i.e., 8,760 hours per year).
[Rule 62-210.200 (PTE), F.A.C.; Construction Permit 1050351-003-AC]

B.2. Surface Coating – Surface coatings shall be applied at the paint booth through use of a spray unit.
{Permitting Note: The spray unit is currently a Graco brand, Bulldog airless pump with Silver Plus spray guns, and may be replaced by a similar unit with no notice to the Department.}
[Construction Permit 1050351-003-AC]

EMISSIONS STANDARDS

B.3. Emissions Limit – Emissions from this emissions unit shall comply with the following:

Pollutant	**Emission Limit** (tons per any consecutive 12-month period)
VOCs	15.0
Any Individual HAP	9.5
Total HAPs	15.0

{Permitting Notes:
-The above limitations will ensure that the emissions of this facility will not exceed the Title V permitting thresholds.
-This booth includes a blower to pull air through filters and ducts. Overspray emission of particulate matter in the paint booth is contained by filters at the inlet duct of the blower.}
[Rule 62-4.070(3) and 62-210.200 – Definition of "HAP", F.A.C.; Construction Permit 1050351-003-AC]

B.4. Monthly Log – The permittee shall keep monthly logs for the facility to document compliance with the VOC and HAP limitations of Specific Condition No. B.3. 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. Once implemented, the chosen option shall not change without prior written approval of the Department.
Note, if any month results in single HAP emissions being within 10% of its associated allowable emission limit for the prior consecutive 12-month period, the monthly log required below shall be then kept daily. The daily logs shall include a cumulative total to demonstrate compliance with individual HAP limitation listed in Specific Condition No. B.3.

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., AgriFleet Leasing Corporation, 1050351, EU 002, Surface Coating);

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

c. Record the monthly total quantity, in gallons, of each surface coating, thinner, solvent and other VOC/HAP containing material used, with the usage of each different material kept separate;

d. Calculate and record the most recent consecutive 12-month period cumulative material usage rate (in gallons per consecutive 12-month period) for each material;

e. For each material/product used that contains VOCs or HAPs, record the percentage (%) by weight of VOC along with the percentage (%) by weight of HAP;

f. Calculate and record the monthly total quantity for cumulative VOC emissions, in tons/month;

g. Calculate and record the most recent consecutive 12-month period cumulative VOC emissions, in tons/year;

h. Calculate and record the monthly total quantity for individual HAP emissions, in tons/month;

i. Calculate and record the most recent consecutive 12-month period individual HAP emissions, in tons/year;

j. Calculate and record the monthly total quantity for total HAP emissions, in tons/month;

k. Calculate and record the most recent consecutive 12-month period total HAP emissions, in tons/year.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050351-003-AC]