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

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

Authorized Representative:
David Masterson, General Manager

Air Permit No. 1050445-004-AO
Permit Expires: 8/15/2019
Lakeland Plant
Minor Air Operation Permit
Initial Operation Permit

This is the final after-the-fact initial operation permit for an existing metal fabrication facility at the Lakeland Plant (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 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.

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 _____ 8-15-14
Kelley M. Boatwright Effective Date
Permitting & 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 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.

David Masterson, Specialty Maintenance and Construction, Inc. (Dave.Masterson@MetalTek.com)

Charles Leiter, Specialty Maintenance and Construction, Inc. (Charles.Leiter@MetalTek.com)

Frank J. Burbach, P.E., ENVIRON International Corporation (fburbach@environcorp.com)

Danielle D. Henry, SWD Compliance Assurance Air Manager (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 8/15/2014

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

Specialty Maintenance and Construction, Inc. 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: Surface Coating Operations (EU No. 001), which consists of a spray booth (No. 1) and a Nuclear Embed Area; and Abrasive Blasting Operations (EU No. 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 existing facility consists of the following emissions units (EUs).

Facility ID No. 1050445

EU ID No.	Emissions Unit Description
001	Surface Coating Operations
002	Abrasive Blasting 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

- Welding operations at the facility are exempt in accordance with Rule 62-210.300(3)(a)13., F.A.C. (Categorical and Conditional Exemptions – Welding Equipment)
- Metal cutting operations associated with the facility's CNC burning table are exempt in accordance with 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 hazardous air pollutants (HAPs). The emission limitations and restriction on the 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

This permit is the initial air operation permit for this facility. Also, reference Construction Permit No. 1050445-002-AC.

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. 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. B.9., if not previously submitted; and

d. copies of the most recent month of records/logs specified in Specific Condition Nos. A.6.and B.10.

[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 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.

e. 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 No. 001 – Surface Coating Operations

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

EU ID No.	Emissions Unit Description
001	Surface Coating Operations - This emission unit consists of an existing drive-in spray booth, Spray Booth No. 1, and an existing Nuclear Embed Area. Spray Booth No. 1 is a non-pressurized, cross draft booth with double bi-fold filtered doors. The booth is approximately 20 feet in width, 44 feet in length and 16 feet in height, which is exhausted by a 7.5 hp fan through a double array of dry filter media. Coating application equipment includes high-volume, low pressure, conventional pressure pot air spray, airless spray, and manual roller coating. The Nuclear Embed Area is a manual roll coat painting area that utilizes, if required, a conveyor belt to transport the carbon or stainless steel plates. 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 booth by a double array of dry filter media located prior to the 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). *{Permitting Note: The 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).
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050445-002-AC]

A.2. Circumvention of Emission Control Equipment – The spray booth filters shall be in service and operating properly during all periods of operating the spray booth.
[Rule 62-210.650, F.A.C.; Construction Permit No. 1050445-002-AC]

EMISSIONS STANDARDS

A.3. Volatile Organic Compound (VOC) Emissions – The emissions of VOC shall not exceed 24.0 tons per any consecutive 12-month period.
[Rule 62-210.200 (PTE), F.A.C.; Construction Permit No. 1050445-002-AC]

A.4. Individual HAP Emissions – The emissions of any individual HAP shall not exceed 9.9 tons per any consecutive 12-month period.
[Rule 62-210.200 (PTE), F.A.C.; Construction Permit No. 1050445-002-AC]

A.5. Total HAPs Emissions – The emissions of Total HAPs shall not exceed 24.0 tons per any consecutive 12-month period.
[Rule 62-210.200 (PTE), F.A.C; Construction Permit No. 1050445-002-AC]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.6. Monthly Log - The permittee shall keep monthly logs to document compliance with the VOC and HAP limitations of Specific Condition Nos. A.3. through 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 No. 001, Surface Coating Operations).

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.; Construction Permit No. 1050445-002-AC]

B. EU No. 002 – Abrasive Blasting Operations

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

EU ID No.	Emissions 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. The enclosure is approximately 35 feet in width, 42 feet in length and 19 feet in height. 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 are controlled by a 75 horse power (hp) PNEUMAFIL, ParaFlo Pro 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.; Construction Permit No. 1050445-002-AC]

B.2. Hours of Operation – This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050445-002-AC]

EMISSION STANDARDS

B.3. Visible Emissions (VE) 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.; Construction Permit No. 1050445-002-AC]

COMPLIANCE TESTING REQUIREMENTS

B.4. VE Compliance Tests - 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.; Construction Permit No. 1050445-002-AC]

B.5. 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.6. 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.7. Operation Rate During Testing – Testing of emissions 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.; Construction Permit No. 1050445-002-AC]

NOTIFICATION REQUIREMENTS

B.8. 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.*}

RECORDKEEPING AND REPORTING REQUIREMENTS

B.9. 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.10. Monthly Log - The permittee shall keep monthly logs to document compliance with the throughput limitation in Specific Condition No. 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 No. 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.; Construction Permit No. 1050445-002-AC]