TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

The Crom Corporation
250 SW 36th Terrace
Gainesville, Florida 32607

The Crom Job Servicing Division/ Crom Equipment Rental
Facility ID No. 0010124

PROJECT

Project No. 0010124-003-AF
Application for Minor Source Air Operation Permit
FESOP Renewal

COUNTY

Alachua, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590

March 16, 2011

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

The Crom Job Servicing Division/ Crom Equipment Rental, which manufactures large prestressed concrete tanks designed and built for water and wastewater usage and construction of small fiberglass components for the tanks (i.e. hatch covers, vent covers, ladders and etc.). (Standard Industrial Classification No. 1542). The facility is located in Alachua County at 6801 SW Archer Road, Gainesville, Florida. The UTM coordinates are Zone 17, 363.20 km East, and 3275.4 km North.

This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

Renewal of the Federally Enforceable State Operating Permit. The facility has requested a facility-wide Styrene emissions cap of less than 10 tons per year and an emissions cap of less than 25 tons per year of Hazardous Air Pollutants (HAPs). This cap will be based on a production throughput limit of 160,000 pounds per year of gelcoats and resins. This facility manufactures large prestressed concrete tanks designed and built for water and wastewater usage and construction of small fiberglass components for the tanks (i.e. hatch covers, vent covers, ladders and etc.).

The Emissions Units are as follows:

Emission Unit No.	Description
001	Equipment Painting
002	Sandblasting
003	Fiberglass Shop

Processing Schedule

2/9/2011 Received the application for a minor source air pollution operating permit renewal.
2/22/2011 Clarification of hours of operation and revised application pages received via email

2. APPLICATION REVIEW

Discussion of Emissions

Permitted Capacity. The maximum operating rate is listed in the t**able(s) below** and shall not be exceeded without prior Department approval.

Emission Unit	Description	Throughput	
003	Fiberglass Shop	160,000 lbs/year Gelcoat and Resin	**Note (1)**

Note (1) Emissions cap requested by applicant to become a synthetic non-Title V Source.

The maximum emissions rates are listed in the t**able(s) below** and shall not be exceeded without prior Department approval.

POLLUTANT	EMISSION RATE Tons per year	
Each Individual HAP	8.45	**NOTES (1) and (2)**
Total HAP Emissions	24.9	**NOTES (1) and (2)**
VOC Emissions	44.22	**NOTES (1) and (2)**

NOTE (1) Basis: Material usage rate; Material density; Constituent Factor (% by weight):
Each Individual HAP = [(0.714 x %styrene) – 0.18] x 2,000 = lb/ton HAP
Each Individual HAP = [(0.169 x %styrene)] x 2,000 = lb/ton HAP (Styrene content of less than 33%) ***This clarification is added per Applicant's request dated 2/9/2011.***
Total HAP Emissions = [(0.714 x %styrene) – 0.18] x 2,000 = lb/ton HAP

NOTE (2) Emissions cap requested by applicant to become a synthetic Non-Title V Source. [Permit Application received February 21, 2006]

Compliance with permitted capacity and maximum emissions rates shall be determined by recording and maintaining the following data:

Quantity	
• Gallons of Material Used (Gelcoat and Resin)	
Emissions Factors	
• Density of Material (Pounds per Gallon)	• Constituent Factor (Percent by Weight Emitted)
Emissions	
• Total Cumulative Emissions in Tons (Determined from 12- Month Rolling Average VOC and HAP Emissions)	

NOTE: Emissions Factors and Emissions Calculation Methods shall be consistent with those used in the permit application and/or modification requests.

State Requirements

This emissions unit is subject to the requirements of Rule 62-296.320, F.A.C.

Federal Requirements

The Crom Corporation ***may be subject to Area Source MACT 40 CFR Part 63 HHHHHH -National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing, upon adoption by reference into the Florida Administrative Code Rule.***

3. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit Leslie maybin is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Northeast District Office, Florida Department of Environmental Protection (Department) 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590.