Florida Department of
Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Angelia Jackson
DATE: September 29, 2011
SUBJECT: Evaluation Summary for Northwest Florida Holdings, Inc., Allanton Facility; 0050071-007-AO, Bay County

We recommend issuing a permit to Northwest Florida Holdings, Inc., to operate their Allanton Facility. This is a renewal of Permit 0050071-006-AO, effective May 10, 2006. Existing facility diesel engines used to drive air compressors became subject to 40 CFR 63 Subpart ZZZZ and/or 40 CFR 60 Subpart IIII due to rule adoption in June 2011. These new requirements are incorporated into this renewal permit.

Process Description.
This facility is a shipbuilding facility that consists of ship construction areas, warehouses and an office building. Areas of the facility are used for blasting, surface coating, equipment storage and pre-fabrication operations.

The blasting and prime casting of most steel plates for new ship construction and repair work is conducted in an enclosed automated system. The automated blasting and painting system utilizes two propane or natural gas-fired burners, one to dry and preheat the steel plates prior to abrasive blasting and a second to cure paint after automated prime coating. These two burners have been determined to be exempt from permitting by Rule 62-210.300(3)(a)35., F.A.C. as they use propane or natural gas. Paints, primers and thinners are stored on site. In addition to the storage of paints, primers and thinners, there are several above ground storage tanks for storage of cleaning solvent, diesel, oil and gasoline.

Pollution Control Equipment.
Emissions collected from the enclosed automated blasting are controlled by a jet pulse dust collector (baghouse). Paint emissions are controlled by the automated system's side draft and down draft paint booth, 16,000 cfm of ventilation, 260 square feet of 2-inch thick exhaust filters and an over spray tray. Emissions from the remaining open-air blasting and painting are controlled by maintaining good work practices. Emissions from automated blasting, are controlled by a jet pulse dust collector (baghouse). Paint emissions are controlled by the automated system's side draft and down draft paint booth.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	N/A	N/A	N/A	<100
SO2	N/A	N/A	*0.46	N/A	<100
VOC	N/A	N/A	63.4	N/A	<100
NOx	N/A	N/A	*33.5	N/A	<100
CO	N/A	N/A	*7.22	N/A	<100
HAP (Total)	N/A	N/A	24.5	N/A	<25
HAP (Indv)	N/A	N/A	9.85	N/A	<10
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	

VE	62-296.320(4)(b)1	N/A	N/A	Not more than 20% opacity

**Emissions reported in latest AOR report associated with EU 002 – Compression Ignition Engines.*

Applicable Rules & Regulations. This source is regulated in accordance with Rule 62-296.320(2) and (4)(b)1., F.A.C. Objectionable Odors are not allowed off plant property and Visible Emissions (VE) are not to equal or exceed 20 percent opacity. Permittee requested maximum allowable limits on VOC and HAP to stay below the major source (Title V) threshold limit. Diesel engines EU 004 and EU 005 are subject to applicable portions of 40 CFR 63 ZZZZ and/or 40 CFR 60 Subpart IIII.

Compliance Monitoring.
VOC, HAP and PM emissions are monitored by material usage records on a monthly and rolling 12-moth total basis. The particulate emissions from the automated blasting system's baghouse are verified to be less than 20 percent with a VE test, if deemed necessary by the Special Compliance Tests rule (62-297.310, F.A.C.).

Compliance History.
2011 – 2007 Compliance inspections noted the facility to be "In-Compliance."

2006 – MNC Dust from vehicular traffic and general yard area. No water truck. Open containers of liquid paint found in dumpster. 6/27/2006 – CCDL/CWOE. Facility agreed to retrain personnel.

Fee Summary.
This is an AO 2C ($750 fee) minor source with no stack test. The facility has three separate emission units all with no stack testing required, each emission unit is $750, making the total amount required for this facility $2,250. The original construction permit fee was $4,500 for an AC1C facility (source less than 100TPY).

AMJ/c