KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
352/377-5822 ▪ FAX/377-7158

639-12-02
October 17,2012

Via Fedex & Email

Mr. Rick Antes
Eastern Shipbuilding Group, Inc
13300 Allanton Road
Panama City, FL 32404

SUBJECT: Eastern Shipbuilding Group, Inc. (Facility ID 0050074)
Panama City, Bay County, Florida
Application for Air Construction Permit: Request to Increase Emissions

Dear Mr. Antes:

Please find enclosed two copies of the air construction permit application which requests to increase emissions at the Nelson Street Facility and two copies of a cover letter to Mr. Rick Bradburn.

Please review and verify that the information on the enclosed applications is correct. Once you have reviewed the information, please sign the owner/authorized representative statement on page (3).

After the signature pages have been signed, please attach a $2000.00 check made payable to the "Florida Department of Environmental Protection." Send the check, original cover letter to Mr. Bradburn, and a copy to the address provided below.

Mr. Rick Bradburn
Florida Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, FL 32502-5740
Tel: (850) 595-8096

The remaining application and cover letter are for company files.

If you have any questions or concerns, please feel free to contact me at (352) 377-5822 or vsgro@kooglerassociates.com.

Best regards,

Veronica N. Sgro

Veronica N. Sgro, P.E.
KOOGLER AND ASSOCIATES, Inc.

Ene.

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Mr. Rick Bradburn
Florida Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, FL 32502-5740

SUBJECT: Eastern Shipbuilding Group, Inc. (Facility ill 0050074)
Panama City, Bay County, Florida
Application for Air Construction Pennit
Request to Increase Emissions

Dear Mr. Bradburn:

Please find enclosed a copy of the subject air construction application and the $2000 process fee. The project requests to increase facility wide emissions.

If you have any questions, please call me at (352) 377-5822 or vsgro@kooglerassociates.com.

Best regards,

Veronica N. Sgro, P.E.
KOOGLER AND ASSOCIATES, INC.

Ene,

Cc: Mr. Rick Antes - Eastern Shipbuilding Group, Inc. (FEDEX and EMAIL)
FDEP Northwest District Office (EMAIL: nwdair@dep.state.fl.us)

Department of
Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - NON-TITLE V SOURCE

See Instructions for Form No. 62-210.900(3)

I. APPLICATION INFORMATION

Identification of Facility

1. **Facility** Owner/Company Name: Eastern Shipbuilding Group	
2. Site Name: Panama City Yard (Nelson Street Facility)	
3. Facility Identification Number: 0050074 [ ] Unknown	
4. **Facility** Location: Street Address or Other Locator: 2200 Nelson Street City: Panama City County: Bay Zip Code: 32401	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Application Contact

1. Name and Title of Application Contact: Veronica N. Sgro, P.E. - Senior Engineer
2. Application Contact Mailing Address: Organization/Firm: Koogler and Associates, Inc. Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609
3. Application Contact Telephone Numbers: Telephone: (352) 377-5822 Fax: (352) 377-7158

Application Processing Information IDEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[ ] Initial non-Title V air operation permit for one or more existing, but previously unpermitted, emissions units.

[ ] Initial non-Title V air operation permit for one or more newly constructed or modified emissions units.

Current construction permit number: _

[ ] Non-Title V air operation permit revision to address one or more newly constructed or modified emissions units.

Current construction permit number:" _

Operation permit number to be revised: ___

[ ] Initial non-Title V air operation permit under Rule 62-21O.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s):

_____

[J Non-Title V air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit number to be revised: _

Reason for revision:_ _

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[X] Air construction permit to construct or modify one or more emissions units.

[J Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

Owner!Authorized Representative

1. Name and Title of Owner/Authorized Representative: Rick Antes - EHS Manager
2. Owner/Authorized Representative Mailing Address: Organization/Firm: Eastern Shipbuilding Group, Inc. Street Address: 13300 Allanton Road City: Panama City State: FL Zip Code: 32404
3. Owner/Authorized Representative Telephone Numbers: Telephone: (850) 522-7409 x 2312 Fax: (850) 871-4350
4. Owner/Authorized Representative Statement: *1, the undersigned, am the owner or authorized representative* of the facility addressed in this application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.* Signature Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Veronica N. Sgro, P.E. Registration Number: 69227
2. Professional Engineer Mailing Address: Organization/Firm: Koogler and Associates, Inc. Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609
3. Professional Engineer Telephone Numbers: Telephone: (352) 377-5822 Fax: (352) 377-7158

4. Professional Engineer Statement:

1, the undersigned, hereby certify, except as particularly noted herein, that:*

*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, **will** comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted **with** this application.*

***If** the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions **unit** described in this application have been ~~**designed or**~~ examined by me or individuals under my direct supervision and found to be in conformity **with** sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

***If** the purpose of this application is to obtain an **initial** air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], if so), I further certify that, with the exception of any changes detailed as part of **this** application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and **with** all provisions contained in such permit.*

VERONICA M. SEE

Signature

10/17/2012

Date

(seal)

* Attach any exception to certification statement.

Scope of Application

Emissions UnitID	Description of Emissions Unit	Permit Type	Processing Fee
001	**Painting** Activities	ACID	$2000
002	Activities associated with Outdoor Abrasive **Blasting**		
003	Internal Combustion **Engine**		

Application Processing Fee

Check one: [X] Attached - Amount: $2000 [J Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

The application requests:

1. To increase the facility wide potential emissions as follows:
    a. VOC < 99 TPY
    b. NOX < 99 TPY
    c. Individual HAPS < 10 TPY
    d. Total HAPS < 25 TPY
2. To remove the operation rate for painting activities presented in Permit No. 0050074-004-AO, Specific Condition A.l.
3. Update Fugitive Emissions Control Plan.

2. Projected or Actual Date of Commencement of Construction: Upon Approval

3. Projected Date of Completion of Construction:

Application Comment

Since the application requests to increase the facility-wide emissions limits, a single permit-type code and fee is applied for this application.

NOX emissions have the greatest proposed change in emissions [Proposed Emissions (99 TPY) - Current Emissions (49.8 TPY) = Change in Emissions (49.2 TPy)]. Based on Based on Rule 62-4.050(4)(a)(2), F.A.C., the processing fee associated with this application is $2000 (construction permit for an emission unit having potential emissions of 25 or more tons per year, but less than 50 tons per year, of any single pollutant).

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 16 East (lem): 630.4 North (lem): 3335.1			
2. Facility LatitudelLongitude: Latitude (DD/MM/SS): 30 / 08/ 30 Longitude (DD/MM/SS): 85 /37 / 57			
3. Governmental Facility Code: O	4. Facility Status Code: A	5. Facility Major Group SIC Code: 37	6. Facility SIC(s): 37
7. Facility Comment (limit to 500 characters):			

Facility Contact

1. Name and Title of Facility Contact: Rick Antes - EHS Manager
2. Facility Contact Mailing Address: OrganizationiFirm: Eastern Shipbuilding Group, Inc. Street Address: 13300 Allanton Road City: Panama City State: FL Zip Code: 32404
3. Facility Contact Telephone Numbers: Telephone: (850) 522-7409 x 2312 Fax: (850) 871-4350

Facility Regulatory Classifications

Check all that apply:

1. [ ] Small Business Stationary Source?	[ ] Unknown
2. [X] Synthetic Non-Title V Source?	
3. [X] Synthetic Minor Source of Pollutants Other than HAPs?	
4. [X] Synthetic Minor Source of HAPs?	
5. [ ] One or More Emissions Units Subject to NSPS?	
6. [X] One or More Emission Units Subject to NESHAP Recordkeeping or Reporting?	
7. Facility Regulatory Classifications Comment (limit to 200 characters): Application synthetically limits facility-wide emissions for VOC, NOx, and HAPS. Internal Combustion Engine (EU 003) subject to 40 CFR Subpart ZZZZ.	

Rule Applicability Analysis

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		Ib/hour	tons/year		
VOC	SM		< 99.0	ESCTIII	
NOX	SM		<99.0		
HAPs	SM		< 10/25		

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1.	Area Map Showing Facility Location: [ ] Attached, Document ID: [ ] Not Applicable [X] Waiver Requested
2.	Facility Plot Plan: [ ] Attached, Document ID: [ ] Not Applicable [X] Waiver Requested
3.	Process Flow Diagram(s): [ ] Attached, Document ill: [ ] Not Applicable [X] Waiver Requested
4.	Precautions to Prevent Emissions of Unconfined Particulate Matter: [X] Attached, Document ill: Attach. 1 [ ] Not Applicable [ ] Waiver Requested
5.	Supplemental Information for Construction Permit Application: [ ] Attached, Document ill: [X] Not Applicable
6.	Supplemental Requirements Comment: Precautions to Prevent Emissions of Unconfined Particulate Matter: See Permit No. 0050074-004-AO, Facility-Wide Condition No.6 and Updated Fugitive Emissions Control Plan (Attachment 1).

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through G as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION

Emissions Unit Description and Status

I. Type of Emissions Unit Addressed in This Section: (Check one) [ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one defmable emission point (stack or vent). [ ] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. [X] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.		
2. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Painting Activities		
3. Emissions Unit Identification Number: ill: 001		[ ] No ill [ ] ill Unknown
4. Emissions Unit Status Code: A	5. Initial Startup Date:	6. Emissions Unit Major Group SIC Code: 37
7. Emissions Unit Comment: (Limit to 500 Characters) This application requests to increase facility-wide VOC, HAP, and NOX emissions (Reference Permit No. 0050074-004-AO, Facility-Wide Condition 7) as well as remove the painting activities operation rate from the permit (Reference: Permit No. 0050074-004-AO, Specific Condition A.2).		

Emissions Unit Control Equipment

1. Control EquipmentlMethod Description (limit to 200 characters per device or method): None.
2. Control Device or Method Code(s): None.

Emissions Unit Details

1. Package Unit: Manufacturer:	Model Number:	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information: Dwell Temperature:		of
Dwell Time:		seconds
Incinerator Afterburner Temperature:		of

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	165,000 gal/yr fuel oil (facility wide)	
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:	hours/day	days/week
	weeks/year	8760 hours/year

6. Operating Capacity/Schedule Comment (limit to 200 characters):

Maximum Process:

1. Based on Permit No. 0050074-004-AO, Facility-wide Condition 8, there is a **facility-wide** limit on fuel oil usage.
2. Request to remove operation rate addressed in Permit No. 0570074-004-AO, Specific Condition A.I.

Maximum Operating Schedule: Based on Permit No. 0570074-004-AO, Specific Condition A.2.

B. EMISSION POINT (STACKlVENT) INFORMATION

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?	2. Emission Point Type Code: 4	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): N/A		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A		
5. Discharge Type Code: F	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: 77°F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):		
14. Emission Point Comment (limit to 200 characters): None.		

C. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment! of!

1. Segment Description (ProcesslFuel Type) (limit to 500 characters): Petroleum and Solvent **Evaporation** → Surface Coating **Operations** → Large **Ships** → Other Not Classified		
2. Source Classification Code (SCC): 4-02-023-99	3. SCC Units: Tons Solvent in **Coating**	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor: *N/A*
7. Maximum % Sulfur: *N/A*	8. Maximum % Ash: *N/A*	9. Million Btu per SCC Unit: *N/A*
10. Segment Comment (limit to 200 characters):		

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: VOC	12. Pollutant Regulatory Code: EL	
3. Primary Control Device Code:	4. Secondary Control Device Code:	5. Total Percent Efficiency of Control:
6. Potential Emissions: lb/hour < 99.0 tons/year		7. Synthetically Limited? [X]
8. Emission Factor: Reference:		9. Emissions Method Code: 0
10. Calculation of Emissions (limit to 600 characters):		
11. Pollutant Potential Emissions Comment (limit to 200 characters): Synthetically limited to escape Title V.		

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCTV	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <99.0 TPY	4. Equivalent Allowable Emissions: lb/hour < 99.0 tons/year
5. Method of Compliance (limit to 60 characters): Record keeping.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Method of Compliance: Record keeping requirements based on Permit No. 0050074-004-AO, Specific Condition A.4.	

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: HAPS	2. Pollutant Regulatory Code: EL	
3. Primary Control Device Code:	4. Secondary Control Device Code:	5. Total Percent Efficiency of Control:
6. Potential Emissions: lb/hour < 10 / 25 tons/year		? Synthetically Limited? [X]
8. Emission Factor: Reference:		9. Emissions Method Code:
10. Calculation of Emissions (limit to 600 characters): Individual HAPS < 10 TPY; Total HAPS < 25 TPY.		
11. Pollutant Potential Emissions Comment (limit to 200 characters): Synthetically limited to escape Title V.		

Allowable Emissions Allowable Emissions! of!

1. Basis for Allowable Emissions Code: ESCTV	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: < 10/25 TPY	4. Equivalent Allowable Emissions: lb/hour < 10 / 25 tons/year
5. Method of Compliance (limit to 60 characters): Record keeping.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Allowable Emissions: < 10 TPY for individual HAPS; < 25 TPY for total HAPS. Method of Compliance: Record keeping requirements based on Permit No. 0050074-004-AO, Specific Condition A.4.	

E. VISIBLE EMISSIONS INFORMATION
(Only Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation! of!

1. Visible Emissions Subtype: VE20	12. Basis for Allowable Opacity: rX] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: 20% Exceptional Conditions: 20% Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): Allowable Opacity based on Permit No. 00S0074-004-AO, Facility-Wide Condition 3 and Rule 62-296.320(4)(b)1., F.A.C. General VE requirement - no compliance testing required based on Department Guidance Memorandum DARM-PER-33.	

F. CONTINUOUS MONITOR INFORMATION
(Only Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A of N/A

1. Parameter Code:	2. Pollutant(s):
3. eMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

G. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Process Flow Diagram [J Attached, Document ill:	[ ] Not Applicable	[X] Waiver Requested	
2. Fuel Analysis or Specification [ ] Attached, Document ID:	[X] Not Applicable	[ ] Waiver Requested	
3. Detailed Description of Control Equipment [ ] Attached, Document ID:	[X] Not Applicable	[ ] Waiver Requested	
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:	X] Not Applicable	[ ] Waiver Requested	
5. Compliance Test Report [ ] Attached, Document ID: [J Previously submitted, Date: ___ [X] Not Applicable			
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:	[X] Not Applicable	[J Waiver Requested	
7. Operation and Maintenance Plan [ ] Attached, Document ID:	[X] Not Applicable	[ ] Waiver Requested	
8. Supplemental Information for Construction Permit Application [ ] Attached, Document ill:	[X] Not Applicable		
9. Other Information Required by Rule or Statute [J Attached, Document ill:	[X] Not Applicable		
10. Supplemental Requirements Comment: None.			

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through G as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[X] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in This Section (limit to 60 characters):
Activities associated with Outdoor Abrasive Blasting

3. Emissions Unit Identification Number:
ill: 002

[ ] No ill
[ ] ill Unknown

4. Emissions Unit Status Code: A	5. Initial Startup Date:	6. Emissions Unit Major Group SIC Code: 37

7. Emissions Unit Comment: (Limit to 500 Characters)

This application requests to increase facility-wide VOC, HAP, and NOX emissions (Reference Permit No. 0050074-004-AO, Facility-Wide Condition 7).

EU 002: Activities associated with Outdoor Abrasives Blasting

Emissions Unit Control Equipment

1. Control Equipment/Method Description (limit to 200 characters per device or method): None.
2. Control Device or Method Code(s): None.

Emissions Unit Details

1. Package Unit: Manufacturer:	Model Number:	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information: Dwell Temperature:		of
Dwell Time:		seconds
Incinerator Afterburner Temperature:		of

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate: 165,000 gall12-month rolling period; 16,000 tons of blasting abrasive/12-month period		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule: hours/day		days/week
weeks/year	See Comment hours/year	

6. Operating Capacity/Schedule Comment (limit to 200 characters):
Maximum Process Rate:

1. Based on Permit No. 0050074-004-AO, Facility-wide Condition **8,** there is a facility-wide limit on fuel oil usage.
2. Annual blasting abrasive based on Permit No. 0050074-004-AO, Specific Condition B.1.

Maximum Operating Schedule: Based on Permit No. 0050074-004-AO, Specific Condition **B.2,** the hours of emission shall be from 6AM to 8PM. However, on no more than five days per year, these hours of operation for outdoor abrasive blasting may be exceeded by the permittee provided that such activity does not commence prior to 6AM or extend past 10PM, and further provided that notice is given to DEP in writing within 24 hours of any day on which the above specified hours of operation are exceeded.

B. EMISSION POINT (STACKIVENT) INFORMATION

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?	2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): No VE required.		
4. ill Numbers or Descriptions of Emission Units with this Emission Point in Common: *Nt*A		
5. Discharge Type Code: F	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: 77°F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfin	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):		
14. Emission Point Comment (limit to 200 characters): None.		

C. SEGMENT (pROCESSIFUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (ProcesslFuel Type) (limit to 500 characters): Industrial Processes → Fabricated Metal Products → Abrasive Blasting of Metal Parts → General		
2. Source Classification Code (SCC): 3-09-002-01	/3. SCC Units: Tons Abrasive Consumed	
4. Maximum Hourly Rate:	5. Maximum Annual Rate: 16,000	6. Estimated Annual Activity Factor: *N/A*
7. Maximum % Sulfur: *N/A*	8. Maximum % Ash: *N/A*	9. Million Btu per SCC Unit: *Nlla*
10. Segment Comment (limit to 200 characters): Maximum Annual Rate: Based on Permit No. 0050074-004-AO, Specific Condition B.t.		

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: NOX	12. Pollutant Regulatory Code: EL	
3. Primary Control Device Code:	4. Secondary Control Device Code:	5. Total Percent Efficiency of Control:
6. Potential Emissions: lblhour < 99.0 tons/year		7. Synthetically Limited? [X]
8. Emission Factor: Reference:		9. Emissions Method Code: 0
10. Calculation of Emissions (limit to 600 characters):		
11. Pollutant Potential Emissions Comment (limit to 200 characters): Synthetically limited to escape Title V.		

Allowable Emissions Allowable Emissions! of!

1. Basis for Allowable Emissions Code: ESCTV	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: < 99.0 TPY	4. Equivalent Allowable Emissions: lb/hour <99.0 tons/year
5. Method of Compliance (limit to 60 characters): Record keeping.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Method of Compliance: Record keeping requirements based on Permit No. 0050074-004-AO, Specific Condition B.3.	

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: VOC	2. Pollutant Regulatory Code: EL	
3. Primary Control Device Code:	4. Secondary Control Device Code:	5. Total Percent Efficiency of Control:
6. Potential Emissions: Iblhour < 99.0 tons/year		7. Synthetically Limited? [X]
8. Emission Factor: Reference:		9. Emissions Method Code: 0
10. Calculation of Emissions (limit to 600 characters):		
II. Pollutant Potential Emissions Comment (limit to 200 characters): Synthetically limited to escape Title V.		

Allowable Emissions Allowable Emissions! of!

1. Basis for Allowable Emissions Code: ESCTV	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <99.0 TPY	4. Equivalent Allowable Emissions: Ib/hour < 99.0 tons/year
5. Method of Compliance (limit to 60 characters): Record keeping.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Method of Compliance: Record keeping requirements based on Permit No. 0050074-004-AO, Specific Condition B.3.	

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: HAPS	12. Pollutant Regulatory Code: EL	
3. Primary Control Device Code:	4. Secondary Control Device Code:	5. Total Percent Efficiency of Control:
6. Potential Emissions: lb/hour < 10 / 25 tons/year		7. Synthetically Limited? [X]
8. Emission Factor: Reference:		9. Emissions Method Code: 0
10. Calculation of Emissions (limit to 600 characters): Individual HAPS < 10 TPY; Total HAPS < 25 TPY.		
11. Pollutant Potential Emissions Comment (limit to 200 characters): Synthetically limited to escape Title V.		

Allowable Emissions Allowable Emissions! of!

1. Basis for Allowable Emissions Code: ESCTV	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: < 10/25 TPY	4. Equivalent Allowable Emissions: lb/hour < 10/25 tons/year
5. Method of Compliance (limit to 60 characters): Record keeping.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Allowable Emissions: < 10 TPY for individual HAPS; < 25 TPY for total HAPS. Method of Compliance: Record keeping requirements based on Permit No. 0050074-004-AO, Specific Condition B.3.	

E. VISffiLE EMISSIONS INFORMATION
(Only Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation! of!

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: 20% Exceptional Conditions: 20% Maximum Period of Excess Opacity Allowed: minlhour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): Allowable Opacity based on Permit No. 0050074-004-AO, Facility-Wide Condition 3 and Rule 62-296.320(4)(b)1., F.A.C. General VE requirement - no compliance testing required based on Department Guidance Memorandum DARM-PER-33.	

F. CONTINUOUS MONITOR INFORMATION
(Only Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A ofN/A

1. Parameter Code:	2. Pollutant(s):
3. eMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

G. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Process Flow Diagram	[ ] Attached, Document ID:	[ ] Not Applicable	[X] Waiver Requested
2. Fuel Analysis or Specification	[ ] Attached, Document ID:	[X] Not Applicable	[ ] Waiver Requested
3. Detailed Description of Control Equipment	[ ] Attached, Document ID:	[X] Not Applicable	[ ] Waiver Requested
4. Description of Stack Sampling Facilities	[ ] Attached, Document ID:	[X] Not Applicable	[ ] Waiver Requested
5. Compliance Test Report	[ ] Attached, Document ID: [ ] Previously submitted, Date: ___ [X] Not Applicable		
6. Procedures for Startup and Shutdown	[ ] Attached, Document ID:	[X] Not Applicable	[ ] Waiver Requested
7. Operation and Maintenance Plan	[ ] Attached, Document ID:	[X] Not Applicable	[ ] Waiver Requested
8. Supplemental Information for Construction Permit Application	[ ] Attached, Document ID:	[X] Not Applicable	
9. Other Information Required by Rule or Statute	[ ] Attached, Document ill:	[X] Not Applicable	
10. Supplemental Requirements Comment: NOTE: Diesel engine used to drive sandblasting air compressor addressed in EU 003.			

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Infonnation Section (including subsections A through G as required) must be completed for each emissions unit addressed in this Application for Air Pennit. If submitting the application fonn in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Infonnation Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one defmable emission point (stack or vent).

[X] This Emissions Unit Infonnation Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Infonnation Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in This Section (limit to 60 characters):
Internal Combustion Engine (290 UP CI RICE)

3. Emissions Unit Identification Number:
ID: 003

[ ] No ill
[ ] ill Unknown

4. Emissions Unit Status Code:	5. Initial Startup Date:	6. Emissions Unit Major Group SIC Code:
A		37

7. Emissions Unit Comment: (Limit to 500 Characters)
This application requests to increase facility-wide VOC, HAP, and NOX emissions (Reference Permit No. 0050074-004-AO, Facility-Wide Condition 7).

This section of the air permit application addresses the diesel engine used to drive sandblasting air compressor mentioned in EU 002.

Emissions Unit Control Equipment

1. Control Equipment/Method Description (limit to 200 characters per device or method): None.
2. Control Device or Method Code(s): None.

Emissions Unit Details

1. Package Unit: Manufacturer:	Model Number:	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information: Dwell Temperature:		of
Dwell Time:		seconds
Incinerator Afterburner Temperature:		of

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtuIhr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate: 165,000 gal/12-month rolling period		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	8760 hours/year

6. Operating Capacity/Schedule Comment (limit to 200 characters):
Maximum Process Rate: Based on Permit No. 0050074-004-AO, Facility-Wide Condition 8.

Maximum Operating Schedule: Based on Permit No. 0050074-004-AO, Specific Condition C.2.

B. EMISSION POINT (STACKIVENT) INFORMATION

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code: 1
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): No VE required		
4. ill Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A		
5. Discharge Type Code:	6. Stack Height: feet	7. Exit Diameter: feet
8. Exit Temperature: of	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet
13. Emission Point UTM Coordinates: Zone:	East (kIn):	North (kIn):
14. Emission Point Comment (limit to 200 characters): None.		

C. SEGMENT (pROCESSIFUEL) INFORMATION

Segment Description and Rate: Segment! of!

1. Segment Description (ProcesslFuel Type) (limit to 500 characters): Internal Combustion Engine → Industrial → Distillate Oil (Diesel) → Reciprocating		
2. Source Classification Code (SCC): 2-02-001-02	3. SCC Units: Thousand Gallons Burned (TGB)	
4. Maximum Hourly Rate:	5. Maximum Annual Rate: 165	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 0.3	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: 140
10. Segment Comment (limit to 200 characters): Maximum Annual Rate and Maximum % Sulfur: Based on Permit No. 0050074-004-AO, Facility-Wide Condition 8. Million BTU per SCC Unit: Based on AP-42, Appendix A.		

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted:	2. Pollutant Regulatory Code:	
3. Primary Control Device Code:	4. Secondary Control Device Code:	5. Total Percent Efficiency of Control:
6. Potential Emissions: Iblhour tons/year		7. Synthetically Limited? [ ]
8. Emission Factor: Reference:		9. Emissions Method Code:
10. Calculation of Emissions (limit to 600 characters):		
11. Pollutant Potential Emissions Comment (limit to 200 characters):		

Allowable Emissions Allowable Emissions of __ __-

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lblhour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

E. VISIBLE EMISSIONS INFORMATION
(Only Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation! of!

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: 20% Exceptional Conditions: 20% Maximum Period of Excess Opacity Allowed: minlhour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): Allowable Opacity based on Permit No. 0050074-004-AO, **Facility-Wide** Condition 3 and Rule 62-296.320(4)(b)1., F.A.C. General VE requirement - no compliance testing required based on Department Guidance Memorandum **DARM-PER-33.**	

F. CONTINUOUS MONITOR INFORMATION
(Only Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A *ofN/A*

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

G. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

Supplemental Reguirements

1. Process Flow Diagram [ ] Attached, Document ID: [ ] Not Applicable [X] Waiver Requested	
2. Fuel Analysis or Specification [X] Attached, Document ID: See Comment [ ] Not Applicable [ ] Waiver Requested	
3. Detailed Description of Control Equipment [ ] Attached, Document ID: [X] Not Applicable [ ] Waiver Requested	
4. Description of Stack Sampling Facilities [ ] Attached, Document ID: [X] Not Applicable [ ] Waiver Requested	
5. Compliance Test Report [ ] Attached, Document ID: [ ] Previously submitted, Date: [X] Not Applicable	
6. Procedures for Startup and Shutdown [ ] Attached, Document ID: [X] Not Applicable [ ] Waiver Requested	
7. Operation and Maintenance Plan [ ] Attached, Document ID: [X] Not Applicable [ ] Waiver Requested	
8. Supplemental Infonnation for Construction Permit Application [ ] Attached, Document ID: [X] Not Applicable	
9. Other Infonnation Required by Rule or Statute [ ] Attached, Document ID: [X] Not Applicable	
10. Supplemental Requirements Comment: Fuel Analysis or **Specification:** See permit application, Emission Unit Section 3, Part C, Segment 1.	

Eastern Shipbuilding Group, Inc. (Facility 10 0050074)
2220 Nelson Street, Panama City, Florida
Attachment 1: Fugitive Emissions Control Plan
Revision Date: October 11, 2012

Fugitive Particulate Matter Emissions from Open-Air Abrasive Blasting

The Eastern Shipbuilding Group (ESG) conducts two types of abrasive blasting at the Nelson Street Facility: spot blasting (following fabrication) and the blasting of marine vessels prior to repair and/or repainting.

Reasonable precautions included for the control of fugitive particulate matter resulting from abrasive blasting include:

1. Use of overlapping screens to prevent any gaps in screened areas;
2. Operator training;
3. Downward projection of blasting material to the extent possible;
4. No new steel plate blasting;
5. No reuse of used or spent blasting material;
6. Use of coal slag/black beauty as the abrasive medium.

These reasonable precautions are consistent with the reasonable precautions required of other shipyards operating under Title V permits elsewhere in the State of Florida.

In addition, upon DEP request, ESG will conduct periodic visual inspections of each sand blasting or painting activity, and will maintain records of such inspections.

The blast media purchased is a special material that emits practically no dust when used. The blast media is stored in a bulk dispensing hopper, and when required, the blast media is dispensed into a portable container. This portable container is used to transport the blasting media to the work site. At the site, the blasting media is poured into the blasting equipment reservoir. Before the blasting begins, climate conditions are considered and if there is a chance that particles may be transported off the property, screens constructed from a polymer filter fabric are erected around the construction blast area. These screens typically are either wrapped around the object to be blasted/painted or 20 to 30 feet high screens are erected surround the object to minimize off-site emissions. After the blasting is complete, the painting begins.

A licensed testing laboratory is contracted to take samples of the expended blast media from repair projects (the blasting of painted surfaces) and test for contamination. If the results indicate contaminants above the acceptable limits, the media is gathered and placed into the contaminated waste dumpster for off-site disposal at an appropriately permitted disposal facility.

Fugitive VOC Emissions from Paint Containers

The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any process or installation, volatile organic compounds (VDe) or organic solvents (OS) without applying known and existing vapor emission control devices or systems. All containers that are used for temporary and permanent storage of VOCs or OS shall be covered where feasible to prevent vaporization of VOCs when not in use. All equipment, pipes, hoses, lids, fittings, etc., shall be operated in such a manner so as to minimize leaks and/or fugitive emissions and spills of volatile materials.

When the paints and solvents are received, they are stored in dedicated storage areas in the paint warehouse. When a project requires painting, the project manager submits a requisition for the painting supplies required for the project. Following submission of the requisition, the information from the requisition is input to the record keeping logs to track usage and emissions as required by the facility air permit. The paint is selected and mixed at the paint warehouse, transported to the construction site, and poured into the spray paint reservoir. This reservoir is covered to minimize fugitive emissions.

A plastic film is placed on the ground below the work to be painted extending outward approximately 20 feet in all directions. This film is placed in order to catch any drops or spills. Spilled paint will dry on the plastic and thus not spill onto the surrounding ground. Curtains/screens are put into place whenever painting occurs. If the area is small enough, the area being painted is covered. If a unit is being painted, the unit exterior is covered. Once erected, the screens remain in place until the blasting/painting operations are completed.

After completing the painting process, all painting expendables, clean-up rags, and the plastic film are gathered and placed into a dumpster dedicated to holding contaminated waste for pick-up. A licensed contaminated waste hauler is under contract with ESG to regularly pick-up the contaminated waste, transport and dispose of it an appropriately permitted disposal facility.

The ESG personnel are instructed to recognize that paints and associated VOC containing compounds must be covered when not in use. It is noted that open-containers of paint at the site of a painting activity and in the process of being applied is not a contradiction of permit conditions to reasonable precautions to assure compliance to the State rule.

Fugitive Particulate Matter Emissions from Vehicular Traffic

Another activity that can contribute to fugitive particulate matter emissions at the Nelson Street facility is vehicle traffic. ESG has a water truck which is used for wetting unpaved roadways and unpaved travels areas within the facility. The company commits to utilizing the water truck to adequately wet unpaved roadways and travel areas as necessary to minimize fugitive particulate matter emissions. This precaution is likewise consistent with reasonable precautions prescribed for other facilities by FDEP.