



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**
Northwest District
160 W. Government Street
Pensacola, Florida 32502-5794

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March 13, 2015

Sent by Electronic Mail – Received Receipt Requested
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PERMITTEE

Southern Erectors, Inc.
6540 West Nine Mile Road
Pensacola, Florida 32526

Air Permit No. 0330293-002-AC
Permit Expires: March 13, 2016

Authorized Representative:
Michael Hatsfelt, Secretary

Southern Erectors, Inc.
Minor Source Air Construction Permit
After-the-Fact Construction Permit

This is an after-the-fact final air construction permit for an existing mechanical fabrication facility which contains sandblasting and painting activities. The work is conducted at the Southern Erectors, Inc., site, which is an Industrial and Commercial Machinery facility (Standard Industrial Classification No. 3564). The facility is located in Escambia County at 6540 West Nine Mile Road in Pensacola, Florida. The UTM coordinates are Zone 16, 462.5 km East, and 3378.2 km North. As noted in the Final Determination provided with this final permit no changes were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of 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 construction 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C., and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

AIR CONSTRUCTION PERMIT

Upon issuance of this final permit, 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 (Mail Station #35, 3900 Commonwealth Boulevard, 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 30 days after this order is filed with the clerk of the Department.

Executed in Pensacola, Florida

/S/

Emile D. Hamilton
District Director
Northwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) 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 March 13, 2015 to the persons listed below.

Michael Hatsfelt, Secretary, Southern Erectors, Inc., mhatsfelt@SEI-group.com
Matt Hartigan, Southern Erectors, Inc., mhartigan@SEI-group.com
Debra J. Hitchcock, P.E., Ascendant Solutions, LLC, dhitchcock@ascendantllc.net

FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

/S/

Clerk

March 13, 2015
Date

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

This is an after-the-fact air construction permit, for an existing Industrial and Commercial Machinery facility.

Southern Erectors, Inc., (SEI) is a design build mechanical contractor providing fabrication and erection functions and services for air pollution control and process air systems for a number of industries such as Power Generation, Pulp and Paper, and Petrochemical.

The facility has an existing sandblasting operation to remove surface rust from raw steel. The operation includes a media silo, sandblasting building and wet scrubber. Abrasive media is pumped from the delivery truck into the silo located adjacent to the sandblasting building. An electric-powered air compressor is used to provide air for the sandblasting operation. Particulate Matter (PM) emissions from the silo loading activity are ducted into the building. Sandblasting occurs inside the building. Abrasive blasting is done using a #7 nozzle at 80 psi. The building's doors are closed and the bay door has a heavy canvas cloth that covers the opening.

An exhaust fan inside the building is turned on prior to sandblasting and silo loading activities. The fan pulls the sandblast air from inside the building into ductwork that is connected to an external wet scrubber. The scrubber consists of an enclosure with water spray nozzles and a fabric curtain that the cleaned air passes through. The water comes from a well located at the facility.

Painting of the raw steel is conducted outside with air assisted spray guns in an area east of the sandblast building. The facility requested limits of 150 gallons per month of coatings and 53 gallons per month of Methyl Ethyl Ketone* (MEK). The facility uses Carboline coatings or equivalent products. Volatile organic compound (VOC) emissions from the painting activities are uncontrolled.

*NOTE: EPA amended the list of hazardous air pollutants (HAP) contained in section 112 of the Clean Air Act on December 19, 2005 by removing the compound methyl ethyl ketone, CAS No. 78-93-3.

The facility also conducts welding and plasma arc cutting activities that are exempt from permitting.

This project will add the following emissions units.

Facility ID No. 0330293	
ID No.	Emission Unit Description
001	Abrasive Blasting Operations (with Control Systems)
002	Surface Coating/Painting Activities

FACILITY REGULATORY CLASSIFICATION

- 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 (CAA).
- 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(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northwest District Permitting Program, Florida Department of Environmental Protection (Department). The District's mailing address is 160 W. Government Street, Suite 308, Pensacola, Florida 32502-5740. All documents related to applications for permits to operate an emissions unit shall be submitted to the District Office at the above address.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the District Office at the above address or nwdair@dep.state.fl.us.
3. Appendices: The Appendices in Section 4 are attached as part of this permit:
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, 62-296 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. Asbestos: This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]
6. 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.]
7. Modifications: The permittee shall notify the Permitting and Compliance Authority upon commencement of construction. Notification may be submitted by electronic mail to nwdair@dep.state.fl.us and copied to the permitting authority at epost_nwdwasteair@dep.state.fl.us. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Abrasive Blasting Operations (with Control Systems)

This section of the permit addresses the following emissions unit.

ID No.	Emissions Unit Description
001	Abrasive Blasting Operations (with Control Systems)

The facility has an existing sandblasting operation to remove surface rust from raw steel. The sandblasting uses an average of 140 tons per year of abrasives. The sandblasting operation includes a media silo, sandblasting building and wet scrubber. Abrasive media is pumped from the delivery truck into the silo located adjacent to the sandblasting building. Particulate Matter emissions from the silo loading activity are ducted into the building. Sandblasting is done inside the building. The building's personnel door is closed and the bay door has a heavy canvas cloth that covers the opening during sandblasting and silo loading operations. An electric powered air compressor supplies air to a #7 nozzle at 80 psi.

An exhaust fan rated at 25,800 cubic feet per minute (cfm) at 0 inches of water pulls the sandblast air from inside the building into ductwork that is connected to an external wet scrubber. The scrubber consists of an enclosure with water spray nozzles and a fabric curtain that the cleaned air passes through. The scrubber has nine (9) spray nozzles that have a combined water flow rate of 18 gal/min. The fabric curtain has a total surface area of 90 ft². The water comes from a well located at the facility.

EQUIPMENT

1. Equipment: The permittee is authorized to operate sandblasting equipment, and control equipment represented in the application received January 30, 20015. [Application No. 0330293-002-AC]

PERFORMANCE RESTRICTIONS

2. Permitted Capacity:

{Permitting Note: There are no emissions unit specific limitations so this permit does not impose any maximum allowable operating limits on the operation or production capacity of this emissions unit.}

3. Restricted Operation: The hours of operation are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

4. Visible Emissions: Visible emissions shall not exceed 20% opacity. [Application No. 0330293-002-AC and Rule 62-296. 320(4)(b)1, F.A.C.]

TESTING REQUIREMENTS

5. Initial Compliance Tests: The emissions unit shall be tested to demonstrate compliance with the emissions standards for Visible Emissions (VE). VE tests shall be conducted within 60 days of the issuance of this permit. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-4.070(3) and 62-297.310(8), F.A.C.]
6. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Notification may be sent via e-mail to nwdair@dep.state.fl.us. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(9), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Abrasive Blasting Operations (with Control Systems)

7. Test Methods: Required tests shall be performed in accordance with the following reference methods.

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

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rules 62-204.800 and 62-297.401, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

8. Sandblasting Activity Operation and Maintenance. The wet scrubber shall be properly operated during all abrasive blasting and silo loading activities. The building and the wet scrubber shall be maintained in a manner sufficient to control emissions. Permittee shall operate and maintain all equipment in accordance with the manufacturer's recommendations and shall adhere to the following reasonable precautions at a minimum:
- The wet scrubber water supply shall be turned on prior to beginning sandblasting or silo loading and shall remain in operation while sandblasting or silo loading are being done. The water nozzles shall be inspected for proper operation. Plugged or broken nozzles shall be repaired before beginning sandblasting or silo loading.
 - The sandblasting building personnel door shall be closed and the loading bay canvas cover shall be brought down to minimize the loading bay opening prior to beginning sandblasting or silo loading. The loading bay opening along the bottom of the canvas cover may be adjusted to allow proper exhaust air flow but not allow fugitive emissions to escape the sandblasting building.
 - The sandblasting building exhaust fan shall be turned on prior to beginning sandblasting or silo loading and shall remain in operation while sandblasting or silo loading are being done.
 - The sandblasting building, the exhaust ducting, the wet scrubber enclosure and the fabric curtain shall be inspected once a day upon beginning sandblasting and upon beginning silo loading for leaks in the building walls, exhaust ducting and scrubber enclosure walls, and, rips or tears in the fabric curtain. Sandblasting and silo loading operations will cease if leaks, rips or tears are detected.
 - The sandblast building walls (including the loading bay canvas cover), exhaust ducting, wet scrubber enclosure and fabric curtain shall be repaired or replaced if holes, rips or tears are observed to allow fugitive emissions.
 - To ensure proper exhaust air flow the fabric curtain shall have accumulated sandblast media dust removed at least twice a year or more frequently as needed. Sandblast media dust collected in the fabric curtain shall be collected and disposed of properly.

[Rule 62-4.070(3), F.A.C., Application No. 0330293-002-AC]

RECORDS AND REPORTS

9. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(10), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. Surface Coating/Painting Activities

This section of the permit addresses the following emissions unit.

ID No.	Emissions Unit Description
002	Surface Coating/Painting Activities

Surface coating of the raw steel is conducted outside with air assisted spray guns in an area east of the sandblast building. The facility requested a limit of 150 gallons per month of surface coatings and 53 gallons per month of Methyl Ethyl Ketone* (MEK), used as a solvent. The facility uses Carboline or equivalent products for surface coatings. VOC emissions from the painting activities are uncontrolled.

*NOTE: EPA amended the list of hazardous air pollutants (HAP) contained in section 112 of the Clean Air Act on December 19, 2005 by removing the compound methyl ethyl ketone, CAS No. 78-93-3.

EQUIPMENT

1. Surface Coating/Painting Activities: The permittee is authorized to operate the surface coating and painting activities as described in the application submitted January 30, 2015. [Application No. 0330293-002-AC]

PERFORMANCE RESTRICTIONS

2. Permitted Capacity: Coatings usage shall not exceed 150 gallons per month. MEK usage shall not exceed 53 gallons per month. [Rule 62-210.200(PTE), F.A.C., and Permittee Request in Application No. 0330293-002-AC]
3. Restricted Operation: The hours of operation are not limited (8760 hours per year), as long as the VOC and HAP emissions limits are not exceeded. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

No emissions unit specific standards.

RECORDS AND REPORTS

4. Monthly Material Usage Record keeping. Monthly materials usage shall be tracked by use logs for gallons of materials used of surface coatings and solvents:
 - a. Monthly summaries, shall be kept and maintained for Department inspection for at least five years from date of usage.
 - b. Monthly summaries shall be certified and signed by a responsible company representative. [Rule 62-4.070(3) and Application No. 0330293-002-AC]