Title V Air Operation Permit Renewal
Permit No. 0570286-031-AV

APPLICANT

The applicant for this project is Tampa Ship, LLC. The applicant's responsible official and mailing address are: Johnie Robertson, Manager of Environmental Affairs, Tampa Ship, LLC, 1130 McClosky Blvd., Tampa, Florida 33605.

FACILITY DESCRIPTION

The applicant operates a shipbuilding and ship repair facility which is located in Hillsborough County at 1130 McClosky Blvd., Tampa, Florida.

The primary activities currently at this facility are the blasting and coating of marine parts and vessels (interior and exterior sections) in the process of building new ships, as well as maintaining and repairing existing ships. Metal parts and modules can also be fabricated for new or existing ships which may be expanded though use of expansion modules. Interior and exterior blasting is performed using abrasive grit (coal slag or steel shot/slag) from blasting nozzles with tarps surround the blasting area to control emissions. Hydroblasting is also used on the exterior and interior of the ships. Coating is performed using spray nozzles, rollers, and brushes with tarps and barriers used to help control overspray. Stationary electric compressors and portable diesel compressors, owned by Tampa Ship or outside contractors, are brought on-site and used to provide pressure for blasting and painting.

The facility is comprised of four dry docks (graving docks), five wet berths, an erection facility that partially covers Graving Dock #4, and a panel line building where parts of modules are fabricated. Other miscellaneous buildings for new and used coating storage, maintenance shops, etc. are also present at the site. The main abrasive material used for ship blasting is coal slag, which is stored on-site in storage silos. The silos are pneumatically loaded, typically at a rate up to 15 tons per hour. The blasting equipment includes blasting pots and a maximum of 16 external blasting nozzles. Both external and internal blasting of ships occurs at the facility. Compressed air for propelling the abrasive grit is provided by diesel compressors, each with a maximum air flow rate of 1,750 cubic feet per minute. Steel shot/slag is also an approved blasting media and hydroblasting is also used on the exterior and interior of the ships.

Particulate matter emissions from the storage silo loading and the transfer of product to the blasting pots are minimized by venting the displaced air through a fabric filter. Dust suppressant(s) may also be utilized to help minimize particulate matter emissions and limit the emissions to 5% opacity or less, pursuant to Rule 1-3.52, Rules of the EPC. Compressor emissions are controlled by the use of diesel fuel only and a limitation on the amount of diesel fuel used in any 12 month period. Particulate matter emissions from blasting are minimized with a limit on the amount of abrasive grit used in any 12 month period, the use of tarps/barriers that surround the blasting area, and best management practices. When blasting an internal section of a ship, the displaced air is passed through a filter device or a tarp enclosure that covers the exhaust points from the internal blasting prior to exhausting to the atmosphere. After blasting, the surfaces are sprayed with a series of marine coatings which may contain one or more volatile organic compounds (VOCs) and/or hazardous air pollutants (HAPs). VOC and HAP emissions are controlled through VOC content restrictions and limits on usage in any 12-month period.

The blasting/coating booth (EU 102) is enclosed within a larger exterior building (referred to as the Surface Preparation Building) to help protect it from the elements. Miscellaneous metal parts are fabricated and prepared (steel shot blasted and coated) prior to being installed on a ship. Both blasting and coating can be performed in the same booth, however, parts that are not able to be coated in the blasting/coating booth may be coated in the small/miscellaneous parts blasting/coating area adjacent to the Surface Preparation Building. The small/miscellaneous parts blasting/coating area is completely enclosed with stationary tarps on all sides and the

top to control overspray and PM emissions. The small/miscellaneous parts blasting/coating area may be expanded and partitioned with tarps to accommodate multiple color paint spraying, as long as the complete enclosure is maintained and there is an impervious surface underneath the coating area to protect contaminants from entering the soil. The expansion will not exceed the square footage of the current small/miscellaneous parts blasting/coating area. This area will remain active, but it will only be used to process those parts that cannot be accommodated in the Surface Preparation Building in order to minimize emissions to the extent practicable.

PM emissions from blasting and coating inside the blasting/coating booth are controlled by separate control devices. Sliding doors are utilized to cover the inlet coating exhaust filter chambers during blasting operations and, conversely, moved to cover the baffled exhaust plenums to the blasting baghouse during coating operations. Exterior doors of the booth should be closed as much as practical during any blasting or coating operation. The blasting/coating booth is 30' wide by 25' high by 60' long. The Blasting/Coating Booth (EU 102) and the small/miscellaneous parts blasting/coating area are primarily used for coating small parts, although they can also accommodate larger parts.

The blasting media for the booth is steel shot that is recycled after blasting. Two (2) blasting nozzles are utilized to remove paint, rust, etc. from the metal pieces in preparation for coating. The used blast material is collected, sized and reclaimed through a reclaim hopper, bucket elevator, air wash separator and 200 yd^3 storage hopper. Beneath the hopper is a blasting pot where the shot is pressurized for blasting with electric compressors. The bucket elevator, air wash separator, and storage hopper are located outside of the booth, but within the Surface Preparation Building housing the booth. Particulate Matter emissions from the blasting process and the recycling of the steel shot are vented through a 38,000 acfm Donaldson/Torit Model ADFT 4-64 cartridge baghouse with a pulse jet cleaning mechanism located outside of the exterior building. Particulate Matter emissions from the blasting/steel shot recycling operation exhaust through a single emission point following the Donaldson/Torit baghouse.

The coating operation is controlled by two (2) 37,500 acfm exhaust fans that are used to vent VOC emissions from the building. Each fan is connected to an exhaust plenum that is covered with filters at the wall inlets to collect overspray. Each fan has its own exhaust point above the booth and exterior building that pulls the air from different sides of the booth. VOC emissions from the coatings are controlled through the use of low solvent coatings, application practices, and limitations on the usage of coatings.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities, which are described in Appendix I.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit No. 0570286-025-AV issued August 23, 2006
Application for a Title V Air Operation Permit Renewal received January 7, 2011

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the emission units, since the Operation and Maintenance Plan for Particulate Control for EU 102 is more stringent than and fulfills the requirements of CAM.

PROJECT REVIEW

The renewal permit updated several portions of the permit summarized as follows:

1) The permit was reformatted using latest version of the preferred Title V permit format. Appendix TV-5 was replaced with new Appendix TV, and Appendices RR and TR were added to document reporting and testing requirements. The Tampa Ship Shipyard BMP was also updated to correct outdated language.
2) The annual operating report due date was changed to April 1st in accordance with state rule changes since the last Title V renewal.
3) The Title V renewal application due date was changed to 225 days prior to expiration in accordance with state rule changes since the last Title V renewal.
4) The Process Description was updated to more accurately reflect the current facility operations. Also, the PM PTE was revised in the REVISED DRAFT permit to account for 25.4 tons per year of PM PTE from paint overspray and a reduction of PM emissions due to the utilization of 95% shade factor tarps (90% control efficiency) for blasting and painting activities. The revised facility-wide PM PTE of 92.4 tons per year has been included in the REVISED DRAFT permit renewal. As a result, the minimum observation period for the annual visible emission tests on the grit blasting operations (nozzles) has been changed from 60 minutes to 30 minutes since the potential-to-emit for the emission unit is less than 100 tons per year of particulate matter.
5) The opacity standard for the grit silos and blasting pots was corrected to 5% opacity pursuant to Rule 1-3.52, Rules of the EPC.
6) Outdated language with respect to requiring the upgrade of the tarps to 95% shade factor was removed from the permit, as the facility currently uses 95% shade factor tarps.
7) A compliance plan, Appendix CP-1, is being included with the permit to address certain outstanding compliance issues with regard to the abrasive silos and new blasting and coating booths located in the panel line building.

COMMENTS

The Intent to Issue, Notice of Intent, and DRAFT Title V Permit Renewal were issued on April 7, 2011. Comments were received from the applicant on May 5, 2011 regarding the DRAFT permit. The comments and responses are listed below.

A. Letter from Johnie Robertson dated April 29, 2011 and received on May 5, 2011:

Comment No. 1: *FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter 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 particulate matter at this facility include:*

I) Recycling or disposing of all solid waste in a permitted Class I or II landfill or other facility approved by the Environmental Protection Commission of Hillsborough County. Receipt of disposal shall be maintained on site for a period of two years and made available to inspectors upon request. [Rule 62-701, FAC]

Tampa Ship requests that EPC remove draft permit requirement FW.5.I. Tampa Ship will continue to properly dispose of solid waste, however, this solid waste requirement does not fall under the scope of a Title V Air Operation Permit. Instead the solid waste disposal requirement, which references Rule 62-701, F.A.C., should be separate from air operating permit requirements under the State Waste Management Division.

Response: EPC staff recognizes that while Facility-wide Condition FW5.I) applies to solid waste regulations, the accumulation of excessive spent abrasive material on-site can result in unconfined PM emissions due to wind, vehicular traffic, etc., if not managed properly. However, this condition is being removed from the permit, as the Shipyard Best Management Practices (BMP's) addresses the handling and storage of spent abrasive material, and EPC expects that Tampa Ship will strive to meet the BMP's and all solid waste regulations at all times.

FROM:

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter 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 particulate matter at this facility include:

I) Recycling or disposing of all solid waste in a permitted Class I or II landfill or other facility approved by the Environmental Protection Commission of Hillsborough County. Receipt of disposal shall be maintained on site for a period of two years and made available to inspectors upon request. [Rule 62-701, F.A.C.]

[Rule 62-296.320(4)(c), F.A.C., Rule 62-296.712, F.A.C., Rule 1-3.52, Rules of the EPC, and Permit No. 0570286-028-AV]

TO:

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter 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 particulate matter at this facility include:

A) Using only coal slag or steel shot/slag for abrasive blasting material unless prior approval is received from the Environmental Protection Commission of Hillsborough County to use another material. Hydroblasting is also an approved method for ship blasting.

B) Using no spent abrasive material, except for steel shot used within a closed blasting system. Steel shot can be reused within an open system, but only if all foreign material has been removed from the spent steel shot prior to reuse.

C) Using wet grit blasting techniques if desired. In the event that wet grit blasting is used, the permittee may be required to obtain authorization in accordance with Rule 62-4.240, F.A.C., prior to commencing wet blasting. No tarps are required when hydroblasting ship surfaces as long as all of blasted material is contained and prevented from being released as fugitive dust.

D) Using barriers or tarps with at least 95% shade factor at all times when blasting any vessel or part thereof above the top of the dock line. Blasting that occurs below the top of the dock line must also utilize tarps or barriers, but only a minimum of 80% shade factor is required. The tarps or barriers shall surround and extend above the blasting surface, with complete enclosure at all times to contain the dust and limit the opacity to below 20% and to minimize the dust from entering the waters of Tampa Bay. When wet blasting, the extent of the enclosure may be less.

E) Conducting all blasting from the top of the ship down and blasting with the nozzle directed downward in order to control airborne emissions except when blasting beneath the vessel or on a small part which makes it physically impractical.

F) Requiring that all blasting operators be trained on procedures which minimize airborne emissions of blasting materials. Records of training (when it was offered and who attended) shall be maintained and be made available for inspectors of the Environmental Protection Commission of Hillsborough County upon request.

G) Using only manual sweeping and vacuum systems to clean-up spent blasting materials. The permittee shall clean-up spent blasting materials and other waste prior to submerging the dry dock. No blowers are permitted.

H) Grit silos and blasting pots shall be equipped with particulate filters to ensure emissions do not exceed 5% opacity. Dust suppressants may be used on the abrasive material in conjunction with particulate filters in order to further reduce particulate matter emissions from the silos and blasting pots.

I) Enclosing, covering or filtering drains or openings in the dry dock during blasting.

[Rule 62-296.320(4)(c), F.A.C., Rule 62-296.712, F.A.C., Rule 1-3.52, Rules of the EPC, and Permit No. 0570286-028-AV]

Comment No. 2: *Appendix CP-l Compliance Plan*
Action. The Title V Responsible Official shall certify in writing to the EPC that all abrasive storage silos and blasting pots brought on-site and used in blasting operations are equipped with fabric filters that limit the opacity of emissions from the silos and blasting pots to 5% *or less pursuant to Rule* 1-3.52, *Rules of the EPC. Visible emissions tests shall be conducted in accordance with EPA Method* 9 *at the point of highest opacity from a comprehensive scan of all abrasive silos on-site and submitted with the certification statement.*
Compliance Date. Within 30 days o/issuance o/the FINAL Title V Permit No. 0570286-031-AV.

Tampa Ship requests that EPC modify the compliance date deadline in the first Action Item listed in the facility's draft compliance plan in Appendix CP-l. Tampa Ship would like to request that the timeframe for the RO's certification that all silos and blasting pots on-site are limited to an opacity of 5% or less by conducting a Method 9 be extended to 60 days past the issuance of the Final Title V permit. Tampa Ship is in the process of completing one ship prior to beginning construction of a new ship, and as such, blasting activities - and the associated grit silo loading - may not occur on a frequent and regular basis as the facility is between projects. The additional 30 days will provide Tampa Ship the time necessary to ensure that ship building activities occur that will require grit silo loading, and that the testing and evaluation during the silo loading can be coordinated.

Response: In order to assist Tampa Ship, EPC staff does not have a problem in extending the test timeframe from 30 days to 60 days from the issuance of the FINAL Title V Permit No. 0570286-031-AV, to demonstrate compliance with the 5% opacity standard, since these activities do not occur on a regular basis at the facility.

FROM: *Action. The Title V Responsible Official shall certify in writing to the EPC that all abrasive storage silos and blasting pots brought on-site and used in blasting operations are equipped with fabric filters that limit the opacity of emissions from the silos and blasting pots to 5% or less pursuant to Rule 1-3.52, Rules of the EPC. Visible emissions tests shall be conducted in accordance with EPA Method 9 at the point of highest opacity from a comprehensive scan of all abrasive silos on-site and submitted with the certification statement.*

Compliance Date. Within 30 days of issuance of the FINAL Title V Permit No. 0570286-031-AV.

TO: *Action. The Title V Responsible Official shall certify in writing to the EPC that all abrasive storage silos and blasting pots brought on-site and used in blasting operations are equipped with fabric filters that limit the opacity of emissions from the silos and blasting pots to 5% or less pursuant to Rule 1-3.52, Rules of the EPC. Visible emissions tests shall be conducted in accordance with EPA Method 9 at the point of highest opacity from a comprehensive scan of all abrasive silos on-site and submitted with the certification statement.*

*Compliance Date. Within **60** days of issuance of the FINAL Title V Permit No. 0570286-031-AV.*

Comment No. 3: *B.12. During each federal fiscal year (October* 1 *- September 30), unless otherwise specified by rule, order, or permit, the permittee shall have a formal compliance test conducted to demonstrate compliance with Specific Condition B.6. The tests shall include testing at the point of highest observed opacity for external blasting, internal blasting, silo loading, and diesel compressor operations. If a required testing point is not operated during the fiscal year, a test is not required for that affected source; however, a formal VE test would be required at the next instance of that source's operation. Two copies of any visible emissions compliance testing shall be submitted to the Air Management Division of the EPC within* 45 *days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A .C. [Rules 62-4.070(3) and 62-297.310(7)(a)4., F.A.C.]*

As presented in the Title V Renewal application, Tampa Ship requests EPC's consideration to align the compliance testing requirement with the operation, and only require formal compliance testing for internal blasting once per permit term. The Tampa facility does not conduct internal blasting on a regular basis, as this practice is likely only needed prior to re-painting a tank for ship maintenance and repair, and it is likely no internal blasting will be conducted within a calendar year (as was the case for the fiscal year 2010). While the existing condition allows Tampa Ship to skip annual testing when internal blasting is not conducted, it requires the testing the very next time internal blasting is performed. With this activity performed so infrequently, it is essentially requiring a formal compliance test each time Tampa Ship conducts internal blasting. This is an onerous requirement for such an infrequent and minor operation. Furthermore, because internal blasting is required infrequently, it is difficult to anticipate and schedule formal compliance tests. If EPC determines that this requirement can not be modified, Tampa Ship requests that EPC provide regulatory or compliance risk justification for their determination.

Response: Pursuant to Rule 62-297.310(7)(a)4., F.A.C., during each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for visible emissions, if there is an applicable standard. Since the internal blasting activity has an applicable standard (20% opacity) pursuant to Rule 62-296.320(4)(b)1., F.A.C., the annual testing requirement can not be removed. However, EPC agrees to remove the requirement to test at the next instance internal blasting is performed, so long as a formal test is performed at some point during the federal fiscal year that internal blasting takes place. Please be advised that Tampa Ship will be limited to 110% of the test rate from the previous compliance test if testing is not conducted at 90-100% of capacity pursuant to Rule 62-297.310(2), F.A.C.

FROM: B.12. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the permittee shall have a formal compliance test conducted to demonstrate compliance with Specific Condition B.6. The tests shall include testing at the point of highest observed opacity for external blasting, internal blasting, silo loading, and diesel compressor operations. If a required testing point is not operated during the fiscal year, a test is not required for that affected source; however, a formal VE test would be required at the next instance of that source's operation. Two copies of any visible emissions compliance testing shall be submitted to the Air Management Division of the EPC within 45 days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-4.070(3) and 62-297.310(7)(a)4., F.A.C.]

TO: B.12. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the permittee shall have a formal compliance test conducted to demonstrate compliance with Specific Condition B.6. The tests shall include testing at the point of highest observed opacity for external blasting, internal blasting, silo loading, and diesel compressor operations. If a required testing point is not operated during the **federal** fiscal year, a test is not required for that affected source; however, **Tampa Ship shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County in writing if one**

or more of the testing points did not operate during the previous federal fiscal year. Two copies of any visible emissions compliance testing shall be submitted to the Air Management Division of the EPC within 45 days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-4.070(3), **62-4.160(8)**, and 62-297.310(7)(a)4., F.A.C.]

Comment No. 4: C33. *The permittee shall test the visible emissions annually from the baghouse exhaust and the building housing the blasting/coating booth between October 1 and September 30 (once per federal fiscal year) with a target date of March 8th of each year. Particulate matter testing shall be conducted prior to permit renewal. [Rules 62-4.070(3), 62-297.310(7)(a)4., FA.C. and Air Construction Permit No. 0570286-026-AC]*

As presented in the Title V Renewal application, Tampa Ship requests that annual visible emissions testing no longer be required. Tampa Ship has complied with Specific Condition *C.33.* and performed PM testing prior to the renewal application. The results of this most recent PM test, conducted on December 10, 2010, were 0.001 gr/dscf, significantly less than the 0.01 gr/dscf limit included in Specific Condition *C.31.* Considering this most recent test, as well as the original test results of 0.0080 gr/dscf, Tampa Ship has demonstrated that the baghouse consistently meets the emissions limit. As well, continuous compliance is verified through daily visible emission inspection, annual formal visible emissions tests, as well as differential pressure monitoring (in accordance with Specific Condition *C.38.).* With the many redundancies of checks, monitoring, and recordkeeping, combined with the consistently low PM emissions results, Tampa Ship requests that PM testing in accordance with Method 5 no longer be required. Tampa Ship believes the additional cost and burden of future PM tests will not provide additional compliance verification. If EPC determines that this requirement cannot be modified, Tampa Ship requests that EPC provide regulatory or compliance risk justification for their determination.

Response: Pursuant to Rule 62-297.310(7)(a)4., F.A.C., during each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for visible emissions, if there is an applicable standard. Since the blasting/coating booth has an applicable opacity standard of 5% pursuant to Rule 62-296.712(2), F.A.C., the annual visible emissions testing requirement can not be removed. In addition, the blasting/coating booth is subject to a 0.01 gr/dscf standard, which is more stringent than the RACT Standard of 0.03 gr/dscf. Since the 0.01 gr/dscf limit was accepted to avoid Prevention of Significant Deterioration (PSD) review pursuant to Rule 62-212.400, F.A.C., and the owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit pursuant to 62-297.310(7)(a)3., F.A.C., the particulate matter testing requirement can not be removed from the permit.

In addition to the above written comments, verbal comments were received from Michael Ballenger, P.E. of Trinity Consultants on the DRAFT permit renewal on April 14, 2011. Many of the comments were administrative in nature. One comment was related to the minimum duration of the visible emissions testing of the abrasive blasting operations. The minimum test duration was 60 minutes in the DRAFT permit renewal since the Potential to Emit (PTE) for the blasting operations was calculated to be greater than 100 tons per year. However, the PTE for the blasting operations has been revised to reflect a 90% control efficiency due to the utilization of 95% shade factor tarps, bringing the PM PTE to less than 100 tons per year for the blasting operations. Therefore, the minimum visible emissions test duration for the grit blasting operations has been revised to 30 minutes in the REVISED DRAFT permit renewal. In addition, Specific Condition B.10. is being revised to promote consistency in visible emissions testing at shipbuilding and ship repair facilities throughout Hillsborough County.

FROM: B.10. Compliance with Specific Condition B.6. shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. Specific observations shall be conducted during the dry blasting of the exterior hull, deck, and superstructure of a marine vessel. All EPA Method 9 compliance testing observation periods shall be at least thirty (30) minutes in duration for the grit silos, blasting pots, and diesel compressors, and at least sixty (60) minutes for the grit blasting operations, unless specifically stated

otherwise in another condition within Subsection B of this permit. The observation point for each blasting operation test shall be at the point of maximum opacity leaving the dry dock enclosure, tarp enclosure, or wind screens … whichever is applicable. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.
[Rules 62-4.070(3), 62-296.320(4)(b)4., and 62-297.310(4)(a), F.A.C.]

TO: B.10. Compliance with Specific Condition B.6. shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. Specific observations shall be conducted **during the dry blasting of the exterior of a marine vessel**. All EPA Method 9 compliance testing observation periods shall be at least thirty (30) minutes in duration for the grit silos, blasting pots, **grit blasting operations,** and diesel compressors, unless specifically stated otherwise in another condition within Subsection B of this permit. **The observation point for the blasting operation test shall be at the point of maximum opacity leaving the dry dock enclosure, tarp enclosure, or wind screens, whichever is applicable.** The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-4.070(3), 62-296.320(4)(b)4., and 62-297.310(4)(a)2., F.A.C.]

FROM: B.5. In order to limit the potential to emit, the maximum allowable PM emissions from the referenced sources shall not exceed the following during any twelve (12) consecutive month period:

Source	PM Emissions (tons/12 months)
Grit Blasting Operations (including diesel compressor emissions)	143.9

[Rules 62-212.300(1)(d), F.A.C., Air Construction Permit Nos. 0570286-017, 0570286-019, 0570286-020-AC, and 0570286-026-AC]

TO: B.5. In order to limit the potential to emit, the maximum allowable PM emissions from the referenced sources shall not exceed the following during any twelve (12) consecutive month period:

Source	PM Emissions (tons/12 months)
Grit Blasting Operations (including diesel compressor emissions)	53.2

[Rule 62-210.200(PTE), F.A.C., Rule 62-4.070(3), F.A.C., and Air Construction Permit No. 0570286-026-AC]

FROM: FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. Emissions calculations shall be done in accordance with the following emissions factors and control efficiencies:

C) Ship Exterior/Interior Abrasive Grit Blasting Operations	0.01 lbs PM/lb abrasive (coal slag) with 70% control efficiency for tarps and partial enclosure

TO: FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. Emissions calculations shall be done in accordance with the following emissions factors and control efficiencies:

C) Ship Exterior/Interior Abrasive Grit Blasting Operations	0.01 lbs PM/lb abrasive (coal slag) with **90**% control efficiency for **95% shade factor** tarps and partial enclosure

FROM: FW10. The maximum allowable VOC emissions from this facility shall not exceed 487 tons for any twelve (12) consecutive month period. The maximum allowable PM emissions from this facility shall not exceed 220 tons for any twelve (12) consecutive month period. [Rules 62-212.300, 62-4.070(3) and 62-296.320, F.A.C.]

TO: FW10. The maximum allowable VOC emissions from this facility shall not exceed 487 tons for any twelve (12) consecutive month period. The maximum allowable PM emissions from this facility shall not exceed **92.4** tons for any twelve (12) consecutive month period. [Rules 62-212.300, 62-4.070(3) and 62-296.320, F.A.C.]

FROM: C.30. The maximum facility-wide allowable particulate matter emissions from all blasting operations shall not exceed 143.9 tons (including interior/exterior ship abrasive grit blasting, abrasive grit silo and pot loading, metal parts abrasive grit blasting in the small/miscellaneous parts blasting/coating area, metal parts steel shot blasting in the blasting/coating booth, and diesel compressor emissions) for any 12-consecutive month period. [Rule 62-4.070(3), F.A.C. and Air Construction Permit No. 0570286-026-AC]

TO: C.30. The maximum facility-wide allowable particulate matter emissions from all blasting operations shall not exceed **67.0** tons (including interior/exterior ship abrasive grit blasting, abrasive grit silo and pot loading, metal parts abrasive grit blasting in the small/miscellaneous parts blasting/coating area, metal parts steel shot blasting in the blasting/coating booth, and diesel compressor emissions) for any 12-consecutive month period. [Rule 62-4.070(3), F.A.C. and Air Construction Permit No. 0570286-026-AC]

Finally, a permit determination request was submitted by Tampa Ship on June 15, 2011 regarding the expansion of the small/miscellaneous parts blasting/coating area adjacent to the Surface Preparation Building. Tampa Ship proposed in the letter to add additional tarps to the small/miscellaneous parts blasting/coating area to be able to create partitions and paint multiple colors while protecting other parts from paint overspray. Based on conversations with Tampa Ship and the facility's consultant, Michael Ballenger, P.E., the expanded coating area will be equipped with an impervious floor to protect contaminants from entering the groundwater. In the request, Tampa Ship did not propose an increase in actual or potential coating usage with this structural change. Tampa Ship will continue to use only a single painter with a single spray gun in the small/miscellaneous parts coating area even after the proposed change. As well, with the multiple colors used in the requested paint scheme, it is likely that the time spent actively coating will decrease during this project, as the painter will frequently need to stop painting, clean the spray gun, and switch colors before continuing the coating of other parts. Therefore, this proposed change is being considered exempt from air permitting since the expansion of the tarped area will not change the quality, nature, or quantity of air emissions from the facility and does not meet the definition of "modification" as defined in Rule 62-210.200(199), F.A.C. The process description is being updated in the REVISED DRAFT permit renewal to reflect the proposed change.

CONCLUSION

This project renews Title V air operation permit No. 0570286-028-AV, which was issued on January 22, 2008. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.