Title V Air Operation Permit Revision
Permit No. 0570442-016-AV

APPLICANT

The applicant for this project is Gulf Marine Repair/Hendry Corporations. The applicant's responsible official and mailing address are: C.R. Watts, Vice President, Gulf Marine Repair/Hendry Corporations, 1800 Grant Street, Tampa, Florida 33605.

FACILITY DESCRIPTION

The applicant operates a ship building and repair facility, which is located in Hillsborough County at 1800 Grant Street, Tampa, Florida.

Both Gulf Marine Repair (GMR) and Hendry Corporation conduct ship building and repair operations, which include blasting and painting of ships and miscellaneous metal parts. Both are located next to each other at the Port of Tampa. GMR and Hendry Corporation operate at Berths 247, 248, 249, 250, 251, 252 and 253.

The activities at Gulf Marine Repair (GMR) include the blasting and coating of marine vessels. Both external and internal blasting of ships occurs at the facility. The abrasive material used for blasting is coal slag, steel shot, and metallic slag (as recognized individually by the permitting authority). The blasting equipment includes five blasting pots with a capacity of 40 tons and up to eight diesel compressors. A maximum of 16 blasting nozzles with ½-inch diameters and maximum delivery pressures of 100 psig may be used at any given time. GMR is also authorized to operate at the property formerly identified as TECO's Hooker's Point Power Plant. The property is located directly south of the main yard and will support up to 3 additional dry docks. This area also includes up to an additional 8 diesel compressors, 4 grit silos, 5 blasting pots and 16 internal and external blasting nozzles. Also included as part of the Title V permit is the similar operation at Hendry Corporation. This facility operates the ship maintenance activities through the use of a single submergible dry dock. This area includes a diesel compressor, 2 grit silos, 2 blasting pots, 8 internal and external blasting nozzles, and a blasting/coating containment area for the blasting and painting of miscellaneous parts.

Particulate emissions from storage silo loading are limited by passing the displaced air through fabric filters (or baghouses). 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 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 other reasonable precautions. 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. Miscellaneous parts are also blasted/coated away from the ships and the permittee utilizes a partially-enclosed blasting/coating booth with permanent walls on all but one side and a baghouse for particulate emissions control. Blasting/coating containment areas with stationary tarps are also present at the main GMR yard and the Hendry yard for control of emissions generated from blasting or coating smaller parts. A permanent coating building is also present for the painting of miscellaneous metal parts. The coating building is located over an impervious surface, and is open on two sides with tarps/curtains for control of overspray from those openings during coating operations.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

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

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit No. 0570442-013-AV issued June 2, 2010

Application for concurrent processing of an air construction permit and a Title V Air Operation Permit Revision received April 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 not 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. The coating operations are subject to 40 CFR 63, Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating). The facility is not subject to 40 CFR 63, Subpart MMMM, for the surface coating of miscellaneous metal parts and products since the facility is already subject to the Subpart II pursuant to 40 CFR 63.3881(c)(12).

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

CAM: The facility does operate units subject to Compliance Assurance Monitoring (CAM).

STATE: The facility does operate units subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology Particulate Matter, F.A.C., since the source falls under Miscellaneous Manufacturing Process Operations (Rule 62-296.712, F.A.C.), and subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology for VOC and NOX Emitting Facilities, F.A.C., since there is an applicable source specific category in this rule: Coating of Miscellaneous Metal Parts and Products (Rule 62-296.513, F.A.C.).

PROJECT REVIEW

The revision permit incorporated the concurrently issued construction permit (Permit No. 0570442-015-AC) and also updated portions of the permit as follows:

1) The Title V permit was reformatted using latest version of the preferred Title V permit format. Appendix TV-6 was replaced with new Appendix TV, and Appendices RR and TR were added to document reporting and testing requirements.

2) Construction Permit No. 0570442-015-AC amended Specific Condition Nos. A.23 and C.23 to remove the requirement that all cleanup solvents used be individually tracked and reported, consistent with other similar source permits. Emissions from overall cleanup solvent usage are still required to be documented.

3) Construction Permit No. 0570442-015-AC amended Specific Condition No. B.9 to remove the requirement that both the exterior hull and deck or superstructure of a marine vessel be tested annually for visible emissions, consistent with other similar source permits. An annual visible emission test is still required on the exterior of a vessel, but the blasting location for testing is no longer specified.

4) The Process Description, Facility-Wide Condition FW6, and Specific Condition No. C.43 of the Title V permit were changed to reflect that other types of slag, specifically metallic slags that have been recognized by the EPC, are also allowed in addition to the previously specified coal slag. Ebony Grit (manufactured by Opta Minerals USA) has been approved by EPC as a metallic slag that can be used as a blasting media at the facility. A visible emission test is required upon its initial use. A 7-day prior notification requirement for use of any new metallic slag has been added to the permit, and a visible emission test upon initial blasting with any new metallic slag is required.

5) The Process Description was updated to reflect that the permanent coating building has been completed since issuance of the last Title V operating permit.

6) The Process Description was updated to remove the reference to specific spray gun models that are used as part of the operations at Hendry Corporation.

7) The Process Description was updated to clarify that both Gulf Marine and Hendry Corporation can operate at Berths 247, 248, 249, 250, 251, 252 and 253.

CONCLUSION

This project revises Title V air operation permit No. 0570442-013-AV, which was issued on June 2, 2010. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.