Title V Air Operation Permit Revision
Permit No. 0570442-017-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 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, and also at the Hooker's Point site.

The activities at GMR/Hendry Corporations include both external and internal blasting of ships at the facility. The facility operates out of multiple berths, including the Hooker's Point site. Diesel compressors are used to provide the pressure for the blasting pots which feed blasting media through a series of nozzles that are used to remove old paint, rust, etc., off of the metal structures of a ship prior to applying new coating. Hydroblasting with water is also performed at the site. The blasting media is stored in silos and dust emissions from the silo loading are controlled with fabric filters. The compressors also provide power for the coating nozzles.

Particulate emissions and overspray from the blasting and coating operations are controlled through the use of tarps/barriers that surround the blasting area. When blasting or coating 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 or coating prior to exhausting to the atmosphere. At GMR, miscellaneous parts are also blasted/coated in an enclosed blasting/coating booth with permanent walls on all sides, except for one side, which has a tarp. PM emissions from this operation are controlled by a baghouse. The blasting/coating containment areas are also present at both GMR and Hendry sites for the blasting and painting of miscellaneous parts, which may be used to process parts that cannot be accommodated in the blasting/coating booth. After blasting, the surfaces are sprayed with a series of marine coatings which contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

The Potential to Emit (PTE) for the facility is 83.4 TPY, 242.4 TPY, and 189.7 TPY, for PM, VOC and HAP emissions, accordingly. GMR/Hendry is a major source for VOC and HAP emissions. The facility is subject to 40 CFR 63, Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating).

In addition, the facility is subject to PM-RACT because the maximum hourly facility-wide PM PTE is greater than 5 lbs/hr and 15 TPY. Although the silo loading is exempt from PM-RACT pursuant to Rule 62-296.700(2)(c), F.A.C., it is subject to the 5% opacity standard of Chapter 1-3.52, Paragraph 2, Rules of the EPC. The diesel compressor is subject to the 20% opacity standard of Rule 62-296.320, F.A.C., because there is no source specific category in Rule 62-296.700, F.A.C. The abrasive blasting of ship interiors and exteriors is not subject to PM-RACT, since it is often not reasonable to enclose and vent PM emissions to a control device. However, the abrasive blasting of miscellaneous metal parts in the blasting/coating booth and blasting containment area prior to attachment to the ship is subject to the 5% opacity standard of Rule 62-296.712(2), F.A.C. Furthermore, the facility is subject to VOC-RACT Rule 62-296.513, F.A.C., for the surface coating operation of ship interiors and miscellaneous parts, excluding the coating of the exterior of an assembled ship.

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

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

Application for a Title V Air Operation Permit Renewal received January 14, 2015
Additional Information Requested: N/A

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

This permit renews Permit No. 0570442-016-AV, and in accordance with this permit, the renewal application due date was October 20, 2014, which is 225 days before the permit expiration date of June 2, 2015. However, the facility failed to submit the renewal application timely, which resulted in the issuance of a warning notice. The facility submitted the renewal application on January 14, 2015 with no changes to the existing Title V operating permit. The warning notice will be closed without enforcement, once the Draft/Proposed is published.

During the application review, EPC staff expressed concerns regarding the generation of HAP emissions associated with the abrasive blasting and coating operations at GMR/Hendry, as well as other shipyards in the area. More specifically, sediment samples collected in the Tampa Bay Ybor Channel by EPC staff, show that the water sediments along the Ybor Channel contain high concentrations of metals (e.g., cadmium, chromium, copper, lead, nickel, silver, and zinc), which are above the Probable Effects Level (PEL) concentrations that were developed by the FDEP, Office of Water Policy. Sediments with concentrations of contaminants that equaled or exceeded the probable effects range are considered to represent a significant and immediate hazard to biological organisms. In order to minimize the generation of air contaminants into the atmosphere, EPC staff consider that the total enclosure marine vessels using tarps/barriers with a 100% shade factor and a baghouse should be the latest available control technology for the ship blasting and coating operations pursuant to Rule 62-

296.320(4)(c)f. and g., F.A.C. and Chapter 1-1.07(2), Rules of EPCHC. However, after further discussions with the FDEP, since the shipyards currently implement best management practices and have demonstrated compliance with the opacity standards, it was determined that this matter should be addressed by the FDEP's Water Program.

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.