M E M O R A N D U M

DATE: June 27, 2011

TO: Richard D. Garrity, Ph.D.

FROM: Stephen Hathaway, P.E. THRU: Diana M. Lee, P.E.
Sterlin K. Woodard, P.E.

SUBJECT: FESOP Renewal/Revision
Custom Fabrication, Inc.
Permit No. 0571016-007-AF

Attached is FINAL renewal/revision Permit No. 0571016-007-AF for the operation of an abrasive blasting and a spray coating operation at a miscellaneous metal parts fabrication facility. This permit has been revised to incorporate the "after-the-fact" installation of the cartridge filter on the sand silo.

Metal parts are sand blasted using one blasting nozzle in a designated blasting building. The building has two solid steel sides and the remaining two sides are equipped with screened doors to control particulate matter emissions. Compressed air for the blasting operation is provided by an electric air compressor. Sand for the blasting operation is stored on site in a single pneumatically loaded storage silo. The sand storage silo has a fiberglass cartridge filtration device to control particulate matter emissions from silo loading operations. The opacity limit on the silo loading operation is being corrected in the renewal permit to 5% opacity in accordance with Rule 1-3.52, Rules of the EPC. The visible emissions limit on the abrasive blasting operation is 20% opacity per Rule 62-296.320(4)(b)1., F.A.C.

After blasting, the metal parts are spray coated using two air-assisted spray guns and/or two airless spray guns. The spray coating operation is performed inside a designated partially enclosed paint building. The coated parts are air dried at ambient temperature. The paint overspray is captured by sand on the impermeable shop floor which is disposed periodically. Oversized parts are permitted to be spray coated outside of the paint building provided there is an impervious layer (tarp) on the ground to capture the paint overspray and the overspray is minimized to the extent practicable. VOC emissions from the surface coating operation are regulated by Rule 62-296.513, F.A.C., which limits VOC emissions to 3.5 lbs/gallon, excluding water, delivered to a coating applicator.

VOC and HAP emissions from the spray coating operation are controlled through the use of low

solvent technology and through limits on the material usage. Particulate matter emissions from the abrasive blasting operation are limited by use of screens and barriers around the blasting area and by limits on blast media usage. Particulate matter emissions from the sand silo are limited by the use of a cartridge filter device and limitations on the loading pressure and loading rate.

A review of the compliance testing over the past 5 years revealed that the facility did not perform visible emissions tests during Federal Fiscal Year 2010. In addition, the facility installed a new control device on the sand silo without a permit. Warning Notice 2011-0079A was issued for these alleged violations. However, due to the current economic climate and the fact that this small facility has not had any other non-compliance issues in the past 5 years, the Warning Notice was closed without enforcement (CWOE).

The DRAFT FESOP permit was issued on May 31, 2011 and no written comments were received from the facility on the DRAFT permit.

On June 17, 2011 the EPC received the proof of Public Notice of Intent to Issue Permit, which was published in The Tampa Tribune on June 12, 2011. No comments were received from the public since the Notice of Intent was published.

Based upon our review, we recommend the issuance of the above referenced permit, as drafted.

SRH: 0571016-007-AF

FINAL DETERMINATION

FOR

Custom Fabrication, Inc.

Hillsborough County

Federally Enforceable State Operating Permit (FESOP)

Application Number

0571016-007-AF

Environmental Protection Commission of

Hillsborough County

Tampa, FL

June 27, 2011

The Environmental Protection Commission of Hillsborough County mailed a public notice package on May 31, 2011 that included the Intent to Issue FESOP Permit No. 0571016-007-AF to Custom Fabrication, Inc., located at 2604 Highway 92 East, Plant City, FL 33566. The AF Permit is for the renewal/revision of the sandblasting and surface coating operation at Custom Fabrication's Plant City facility.

The Public Notice of Intent to Issue was published on June 12, 2011 in The Tampa Tribune.

No comments were received from the facility or the public since the Intent was published.

The final action of the Environmental Protection Commission of Hillsborough County is to issue the final AF permit.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mr. Jeff Cook
President
Custom Fabrication, Inc.
2604 Highway 92 East
Plant City, FL 33566

Dear Mr. Cook, Re: Hillsborough County - AP

Enclosed is renewal/revision Permit No. 0571016-007-AF to operate a miscellaneous metal parts blasting and coating operation, issued pursuant to Section 403.087, Florida Statutes. This permit also incorporates the utilization of a cartridge filter device on the sand silo and restricts the opacity of emissions from the silo to 5% per Rule 1-3.52, Rules of the EPC. **Please read the permit thoroughly, as there are changes to the previous permit**.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Dr, Tampa, FL, 33619; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/SRH/srh

cc: Florida Department of Environmental Protection, Southwest District (via e-mail)
Ken Given, P.E. – Air Testing & Consulting, Inc.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

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

_____ _____
Clerk Date

PERMITTEE:
Custom Fabrication, Inc.
2604 Highway 92 East
Plant City, FL 33566

PERMIT/CERTIFICATION
Permit No: 0571016-007-AF
County: Hillsborough
Expiration Date: June 27, 2016
Project: Spray Coating and Abrasive Blasting

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

For the operation of an abrasive blasting and spray coating operation at a miscellaneous metal parts fabrication facility. Metal parts are sand blasted using one blasting nozzle in a designated blasting building. The building has two solid steel sides and the remaining two sides are equipped with screened doors to control particulate matter emissions. Compressed air for the blasting operation is provided by an electric air compressor. Sand for the blasting operation is stored on site in a single pneumatically loaded storage silo. The sand storage silo has a fiberglass cartridge filtration device to control particulate matter emissions from silo loading operations.

After blasting, the metal parts are spray coated using two air-assisted spray guns and/or two airless spray guns. The spray coating operation is performed inside a designated partially enclosed paint building. The coated parts are air dried at ambient temperature. The paint overspray is captured by sand on an impermeable floor, which is disposed periodically. Oversized parts are permitted to be spray coated outside of the paint building provided there is an impervious layer (tarp) on the ground to capture the paint overspray and the overspray is minimized to the extent practicable.

VOC and HAP emissions from the spray coating operation are controlled through the use of low solvent technology and through limits on the material usage. Particulate matter emissions from the abrasive blasting operation are limited by the use of screens and barriers around the blasting area and by limits on blast media usage. Particulate matter emissions from the sand silo are limited by the use of a cartridge filter device and limitations on the loading pressure and loading rate.

Location: 2604 Highway 92 East, Plant City, FL 33566

UTM: 17-392.40 E 3100.10 N NEDS NO: 1016

Point ID: 001 - Spray Coating
002 - Abrasive Blasting
003 - Silo

References Permit No.: 0571016-001-AF
Replaces Permit No.: 0571016-006-AF

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

4. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

5. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

Spray Coating Operation

6. In order to limit the Potential to Emit and establish the facility as a synthetic minor for both criteria and Hazardous Air Pollutants (HAP), the following emission limitations shall apply: [Rules 62-296.320, 62-212.300, 62-4.070(3), F.A.C. and Permit Application received on April 1, 2011]

A) The maximum volatile organic compounds (VOC) emissions from the entire facility shall not exceed 10 tons for any 12 consecutive month period.
B) The HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP, and less than 25 tons in any 12 consecutive month period for any combination of HAPs.

7. The permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator. [Rule 62-296.513(2)(a)2., F.A.C.]

8. All volatile organic compound emissions from solvent washings shall be considered in the emission limitation of Specific Condition No. 7, unless the solvent is directed into containers that prevent evaporation into the atmosphere. [Rule 62-296.513(2)(c), F.A.C.]

9. The following restrictions and limitations shall apply facility wide in order to ensure compliance with Specific Condition Nos. 6 and 7: [Rule 62-4.070(3), F.A.C. and Permit Application received on April 1, 2011]

A)

Material	VOC Emissions per 12 Consecutive Month Period (Tons)	Usage per 12 Consecutive Month Period (gallons)
Coatings	5.0	2,857
Clean-up Solvent	5.0	1,493

SPECIFIC CONDITIONS:

B) Addition of a solvent is permitted to the extent to make the coating(s) usable, but in no case shall the VOC content of the coating(s) as applied exceed the standard as specified in Specific Condition No. 7.
C) The permittee is authorized to perform solvent clean up operations.
D) The permittee shall not perform any cold cleaning operations as described in 40 CFR 63, Subpart T.
E) The spray coating operation shall be performed only in the designated spray coating area.
F) Spray coating in the open yard shall be limited to oversized parts which can not be accommodated in the designated spray room. The open yard spray area shall have an impervious layer to prevent the paint overspray and solvents from entering the soil and contaminating the ground water.
G) The spray coating operation in the open yard shall be curtailed or halted during high wind conditions.
H) In order to ensure compliance with Specific Condition No. 7 the Material Safety and Data Sheets (MSDS) for all coatings shall be kept onsite and shall be made available upon request to any local, state, or federal air pollution agency.

10. Compliance with Specific Condition No. 7 shall be determined using EPA Method 24 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The EPC will accept, instead of the coating analysis methods required under Rules 62-296.500(2)(b)2. and 3., F.A.C., a certification by the coating manufacturer of the composition of the coating if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings". The certifications shall be kept on site for each material and made available upon request to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency. [Rule 62-296.500(2)(b)4, F.A.C.]

11. In order to show compliance with Specific Condition Nos. 6, 7, and 9, the permittee shall maintain daily records of the spray coating operation. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request. Records shall remain onsite for at least three (3) years and shall include, but not limited to, the following: [Rule 62-4.160(14) and 62-296.500(2)(b), F.A.C.]

A) Day, Month, Year
B) Type and amount of coating and clean up solvents used (gallons)
C) VOC and HAP contents of the coatings and solvents, as applied (lbs/gallon)
D) Daily VOC, individual HAP, and total HAP emissions (lbs)
E) Monthly summary of:
   a. Coating usage (gallons)
   b. Solvent usage (gallons)
   c. VOC, individual HAP, and total HAP emissions (lbs or tons)
F) 12 month rolling total of E) above

12. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320, F.A.C.]

A) Maintain tightly fitting covers, lids, etc. on all containers when they are not being handled, tapped, etc.

SPECIFIC CONDITIONS:

B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
C) Immediately attend to all spills/waste as appropriate.

13. The permittee shall, on a regular basis, collect and dispose of the floor spread/covering saturated with overspray paint through a licensed agent. [Rule 62-4.070(3), F.A.C.]

Abrasive Blasting Operation

14. Visible emissions from the sand blasting operation shall not be equal to or greater than 20% opacity. Visible emissions from the sand storage silo loading operation shall not be greater than or equal to 5% opacity. [Rule 62-296.320(4)(b)1., F.A.C. and Rule 1-3.52, Rules of the EPC]

15. In order to ensure compliance with the emission limitations in Specific Condition No. 14, the following shall apply: [Rule 62-4.070(3), F.A.C. and Permit No. 0571016-001-AF]

A) No more than 450 tons of abrasive sand shall be used in any twelve consecutive month period.
B) All dust laden air which is displaced during the silo loading process shall be sent to the cartridge filter before being discharged to the ambient air.
C) The sand silo loading rate shall not exceed 25 tons per hour. The silo delivery pressure shall not exceed 12 psig. The permittee shall post a sign at the silo advising operators of the maximum allowable silo delivery pressure.
D) No more than one blasting nozzle shall be in use at any time.
E) The maximum nozzle pressure: 100 psig.
F) Only electric air compressors shall be used to provide air pressure for the blasting operation.
G) Lateral screens or other barriers shall be used on all sides of the blasting area. The lateral screens or other barriers shall extend above the blasting work height to surround all areas of blasting activities. No unconfined blasting shall be allowed

16. Test the emissions from the sand storage silo loading and the blasting of miscellaneous metal parts for opacity once per Federal Fiscal Year (October 1 – September 30) and submit two copies of test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. Tests on the blasting operation shall include a dry blasting test on a typical part. [Rule 62-297.310(7)(a)4., F.A.C.]

17. Compliance with the emission limitations of Specific Condition No. 14 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. 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. EPA Method 9 observation periods shall be at least thirty minutes in duration for the abrasive blasting operation. The minimum observation period for the silo filling operation shall be equal to the duration to fill at least one truckload of the abrasive material. The opacity observation shall include the period during which the highest opacity emissions can reasonably be expected to occur. The observation point for the blasting operation tests shall be at the point of maximum opacity leaving the blasting enclosure.

18. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity described as one blasting nozzle at 100 psig and a silo loading rate of 25 tons per hour. If it is

impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test rate until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates and actual operating conditions, such as the silo and blasting delivery pressures and silo loading rate, may invalidate the test. Ambient wind speed and wind direction shall be reported with the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

19. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

20. In order to ensure compliance with Specific Condition Nos. 14 and 15, the permittee shall maintain monthly records of the abrasive blasting operation. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request. Records shall remain onsite for at least three (3) years and shall include, but not limited to, the following: [Rule 62-4.160(14) and 62-296.500(2)(b), F.A.C.]

A) Monthly total of the type and amount of abrasive blasting material used.
B) Twelve month rolling total of the amount of abrasive blasting material used.

<u>Facility-wide</u>

21. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not limited to, the following: [Rule 62-296.320, F.A.C. and Enforcement Case No. 02-0509FA1016]

A) Only new sand coated with a dust suppressant shall be used for the abrasive blasting operation unless prior approval to use another material is received from the Environmental Protection Commission of Hillsborough County.
B) No spent abrasive material shall be reused.
C) Except when blasting beneath a part or when it is physically impractical, all blasting shall be conducted from the top of the part down and the blasting nozzle shall be directed downward in order to control airborne emissions.
D) All blasting operators shall be trained on procedures which minimize airborne emissions of blasting material. Records of training (when it was offered and who attended) will be maintained and be made available upon request to the Environmental Protection Commission of Hillsborough County.
E) Only manual sweeping and vacuum systems to clean up spent blasting material shall be used. Blowers are not permitted.
F) All pneumatically loaded sand storage silos shall be equipped with a filtration device. The filter shall be maintained in accordance with the manufacturer's specifications to ensure its performance.
G) A dust suppression system shall be used on the unpaved traffic areas of the facility.

SPECIFIC CONDITIONS:

22. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

23. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes which may result in a modification to this permit pursuant to Rule 62-210.200(169), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to the following and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment.
B) Installation or addition of any equipment which is a source of air pollution.

24. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

25. Submit to the Environmental Protection Commission of Hillsborough County each calendar year, on or before April 1, completed DEP Form 62-210.900(5), “Annual Operating Report for Air Pollutant Emitting Facility”, for the preceding calendar year. [Rule 62.210.370(3), F.A.C.]

26. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director