FINAL DETERMINATION

FOR

Orion Marine Construction, Inc.

Tampa Tyson Avenue Facility

Hillsborough County

Construction Permit

Application Number

0571432-001-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

February 25, 2013

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on January 18, 2013 that included Intent to Issue Air Construction Permit No. 0571432-001-AC to Orion Marine Construction located at 5440 West Tyson Avenue, Tampa, Hillsborough County, FL 33611.

The air construction permit authorizes the facility to construct an abrasive blasting area, which will consist of abrasive blast booths, and a grit storage silo. In addition, the facility will renovate and upgrade an existing enclosed paint booth with new paint filters and blowers. Particulate matter emissions from grit blasting will be controlled by application practices and total enclosure using portable screens/tarp. The silo will be equipped with a fabric sock filter and pneumatically loaded. All spray painting will be done with HVLP and/or airless spray gun system using low VOC coatings and/or water based coatings.

The Public Notice of Intent to Issue was published on February 8, 2013 in the Tampa Bay Times.

No comments have ever received since the Intent was published.

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

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

John Whalen
Vice President of Tampa Operation
Orion Marine Construction, Inc.
PO Box 13427
Tampa, FL 33681

Dear Mr. Whalen:

Re: Hillsborough County - AP

Enclosed is an initial Permit No. 0571432-001-AC for blasting and painting operations that will be conducted on 5440 West Tyson Avenue, Tampa, FL 33611, issued pursuant to Section 403.087, Florida Statutes.

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/KRZ/krz

cc: James Shirk, P.E. - James E. Shirk, P.E.

Will Horn - Uniquhorn T&EC, LLC

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:
Orion Marine Construction, Inc.
PO Box 13427
Tampa, FL 33681

PERMIT/CERTIFICATION
Permit No.: 0571432-001-AC
County: Hillsborough
Expiration Date: February 1, 2015
Project: Blasting and Coating Operations

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:

This initial permit is being issued to Orion Marine Construction for blasting and painting operations that will be conducted on 5440 West Tyson Avenue, Tampa, FL 33611. Orion will construct an abrasive blasting area, which will consist of abrasive blast booths, and also a grit storage silo. In addition, they will conduct painting inside a paint booth building that will be equipped with paint filters and blowers.

The operation at the Tyson Avenue site will be an addition to the activities carried out at the Commerce Street site. The blasting booth will be constructed in a 50'(W) x 100'(L) x 20'(H) totally tarp enclosed containment area on concrete slab with 2' tall concrete wall on 3 sides. The facility will use coal slag or equivalent blast media (i.e., copper slag, garnet, etc.) to conduct their blasting operations. A maximum of 3 nozzles will be used in the blasting booth, which will be powered by an electric air compressor. Also, a grit storage silo will be installed at the site. The silo will be equipped with a fabric sock filter and pneumatically loaded with maximum loading pressure limited to 12 psig. Particulate matter emissions from grit blasting will be controlled by application practices and total enclosure using portable screens/tarp, which are required at all times when blasting occurs.

The facility will also be conducting painting operations inside of a fully enclosed paint booth equipped with filters and the emissions will be vented out through a stack. The existing enclosed 3,642 ft^2 paint booth will be renovated and upgraded with new paint filters and blowers. All spray painting will be done with HVLP and/or airless spray gun system using low VOC (<3.5 lb/gal) coatings and/or water based coatings. Large parts that cannot fit in the paint booth may be painted in the blasting booth.

The painting operation is subject to VOC-RACT, Rule 62-296.513,F.A.C, Surface Coating of Miscellaneous Metal Parts, which limits the VOC content of the coatings to 3.5 lb-VOC/gal. Also, the facility is subject to PM RACT, Rule 62-296.712, F.A.C., with a 5% opacity standard. 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, pursuant to Chapter 1-3.52, Paragraph 2, Rules of the EPC.

Location: 5440 West Tyson Avenue, Tampa

UTM: 17-348.3 E and 3085.5 N

Facility ID: 0571432

Emission Unit Nos.:	001 – Coating Operations 002 – Grit Silo 003 – Abrasive Blasting Operations

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 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(2), F.A.C.]

5. 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.

Coating Operations

6. For any coating applied, the maximum allowable Volatile Organic Compound (VOC) content of the surface coatings shall not exceed 3.5 pounds per gallon of coating, excluding water, delivered to the coating applicator. [Rules 62-4.070(3) and 62-296.513(1)(b), F.A.C., and Construction Permit Application submitted on December 11, 2012]

7. As requested by the permittee, in order to establish the facility as a synthetic minor for both criteria and Hazardous Air Pollutants (HAP), and to exempt the facility from the requirements of 40 CFR 63, Subpart II and Subpart MMMM, the following emission limitations shall apply:
[Rules 62-4.070(3), 62-296.320, 62-212.300, F.A.C., and Construction Permit Application submitted on December 11, 2012]

A) The maximum VOC emissions from the facility shall not exceed 24.7 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.

8. As requested by the permittee, in order to limit the potential to emit, the following material usages and restrictions shall apply:
[Rule 62-4.070(3), F.A.C., and Construction Permit Application submitted on December 11, 2012]

SPECIFIC CONDITIONS:

Material	Maximum Gallons in any 12 Consecutive Months	Maximum VOC Content (lb/gal)
Coatings	10,000	3.5
Cleanup Solvents	2,000	7.2

9. Compliance with the emission limitation of Specific Condition No. 6 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 EPA VOC Data Sheet (Properties of the Coating "As Applied" by the Permittee), designated Appendix A shall be maintained on-site and available for review for each coating. In lieu of the Method 24, a certification by the coating manufacturer of the composition of the coating, if it is supported by actual batch formulation records is acceptable as well. The manufacturer's certification must be consistent with EPA's document number 450/3-84-019, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings," as corrected on August 5, 1986. The minimum sampling 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.

10. The permittee shall not store, handle, process, or use in any process of VOC or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the EPC: [Rules 62-4.070(3) and 62-296.320(1), F.A.C.]

A) Maintain covers, lids, etc. on all containers when they are not being handled, tapped, etc.
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) Attend to all spills/waste as soon as practical but no later than one hour after the event.
D) Using only airless spray applicators, HVLP cup sprayers, rollers, or brushes, unless a request for use of another technology is submitted in writing and approved by the EPC.
E) Using high solids coatings whenever they are available and whenever they meet customer specifications.
F) All miscellaneous metal parts to be coated shall be contained within the paint spray booth or may be painted in the blasting booth if the parts are too large for the paint booth.
G) Replace the paint booth filters when the pressure differential exceeds 0.50”w.g., as recommended by the filter manufacturer.

Grit Blasting Operations

11. Visible emissions from the abrasive grit silo and from the abrasive blasting operations shall not be greater than 5% opacity. [Rule 62-296.712(2)., F.A.C. and Chapter 1-3.52, Paragraph 2, Rules of the EPC]

12. In order to limit the potential to emit, the maximum PM emissions from the grit blasting operations shall not exceed 3.0 tons for any 12 consecutive month period.
[Rule 62-4.070(3), F.A.C. and Construction Permit Application submitted on December 11, 2012]

SPECIFIC CONDITIONS:

13. In order to ensure compliance with the emission limitations in Specific Condition Nos. 10 and 11, the following usages and restrictions shall apply:
[Rule 62-4.070(3), F.A.C. and Construction Permit Application submitted on December 11, 2012]

A) No more than 1,000 tons of abrasive grit shall be used in any 12 month period.
B) All dust laden air which is displaced in the silo loading process shall be filtered before being discharged to the ambient air.
C) No more than 3 blasting nozzles shall be in use at any given time.
D) The maximum loading pressure for the grit blasting storage silo shall not exceed 12 psig.
E) All miscellaneous parts shall be blasted in the blasting containment area (booth).
F) The maximum throughput for the grit storage silo shall be 1,000 tons in any 12 month period.

14. In order to demonstrate compliance with the emission limitations specified in Specific Condition No. 11, the permittee shall conduct initial tests for visible emissions (VE) for the grit blasting and storage silo loading operations, within 60 days upon startup of facility operations, and annually thereafter. The tests shall include testing at the points of highest observed opacity for blasting and silo loading operations. Submit two copies of test data, along with the silo loading pressure and the number of blasting nozzles, to the Air Management Division of the EPC within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297, F.A.C. [Rule 62-4.070(3) and 62-297.310(7)(a)4., F.A.C.]

15. Compliance with the emission limitations of Specific Condition No. 11 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. All EPA Method 9 observation periods shall be at least thirty (30) minutes in duration. 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 62-296.320(4)(b)4. and 62-4.070(3), F.A.C.]

16. 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.]

17. Testing of emissions shall be conducted with the sources operating at capacity. Capacity is defined as 90-100% of rated capacity for blasting and silo loading operations as follows:

A) Blasting Booth – Capacity is defined as the uninterrupted operation of 3 abrasive blasting nozzles simultaneously at a maximum pressure of 100 psig.
B) Grit Silo Loading - Capacity is defined as a maximum loading pressure of 12 psig.

If it is impracticable to test at capacity, then the sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the source 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, operating pressures and actual operating conditions (including the wind speed and wind direction) may invalidate the test.
[Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

18. The following reasonable precautions shall be taken to control the emissions of unconfined particulate matter associated with the abrasive blasting operation.
[Rules 62-4.070(3) and 62-296.320, F.A.C.]

A) The permittee shall use coal slag or equivalent blast media, such as copper slag or garnet, for abrasive blasting materials unless prior approval is received from the EPC to use another material.
B) No spent abrasive material shall be reused.
C) The permittee may use wet grit blasting techniques whenever desirable. In the event that wet blasting is used, the permittee shall be required to obtain the appropriate water pollution permits in accordance with Rule 62-4.240, F.A.C. prior to commencing wet blasting.
D) The blasting containment area (booth) shall be covered on all sides, including the top, with tarps or barriers with at least 95% shade factor to totally enclose the blasting of miscellaneous parts. To minimize the potential impact of the blasting operations to the soil, the blasting containment area shall operate over an impermeable surface, such as concrete or sealed asphalt, and curbing 3 sides by 2 foot by 2 foot concrete to minimize the effect of water run-off from the area.
E) The blasting operator(s) shall blast with the nozzle directed downward in order to control airborne emissions except when blasting beneath the parts which makes it physically impractical.
F) The permittee shall require all blasting operators to be trained on procedures which minimize airborne emissions of blasting materials. Records of training (when it was offered and who attended) will be maintained and be made available for inspectors of the EPC upon request.
G) The permittee shall use only manual sweeping and vacuum systems to clean-up spent blasting materials. No blowers are permitted.
H) The permittee shall use and maintain a filtration device on the exhaust of the grit storage silo.
I) All solid waste shall be recycled or disposed of in a permitted Class I or II landfill or other facility approved by the EPC if it is disposed of in 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.]

19. 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(4)(c), F.A.C, which includes storing all spent abrasive blast material in a covered containment area. 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.

SPECIFIC CONDITIONS:

Recordkeeping Requirements

20. In order to demonstrate compliance with Specific Condition Nos. 6, 7, 8, 12 and 13, the permittee shall maintain a recordkeeping system for the most recent three-year period. The records shall be made available to the EPC upon request. The records shall include, but not limited to, the following:
[Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

Daily

A) The amount and type of coatings (including catalyst and reducer for multi-component coatings) used, in gallons.
B) The VOC/HAP content of the coating as applied.
C) The amount of cleanup solvent used (gallons) and the VOC/HAP content.
D) Loading pressure for the grit storage silo, in psig, during each loading operation.

Monthly/12-Month Rolling Total

E) The amount of coatings and cleanup solvents used each month, including a 12-month rolling total.
F) Total VOC and HAP emissions for each month, including a 12-month rolling total.
G) The type and amount of abrasive blasting material used each month, including a 12-month rolling total.
H) Total PM emissions from all grit blasting and silo loading operations for each month, including a 12-month rolling total.

21. When the 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) and 62-4.070(3), F.A.C.]

22. The permittee shall provide timely notification to the EPC prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(203), F.A.C. 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: [40 CFR 60.15, Rules 62-4.070(3) and 62-210.300, 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.

23. 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.]

SPECIFIC CONDITIONS:

24. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]

25. A minimum of two copies of an operating permit application with applicable compliance test report for incorporating this construction Permit No. 0571432-0001-AC into an operating permit shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of testing or 90 days before the expiration date of this permit, whichever comes first.
[Rules 62-4.070(3) and 62-210.300(2), F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director