TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Pierce Manufacturing, Inc.
2600 American Drive
Appleton, WI 54915

Pierce Manufacturing, Inc., Florida Division

Facility ID No. 0810031

PROJECT

Project No. 0810031-015-AC
Application for Minor Air Construction Permit
Project Name: Add Paint Booth #9

COUNTY

Manatee County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

January 13, 2010

Prepared by Cindy Zhang-Torres

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. <u>Project Description:</u>

A. Applicant:

Mr. James Johnson, President
Pierce Manufacturing, Inc.
2600 American Drive
Appleton, WI 54915

B. Professional Engineer:

Mr. Gerald J. Kissel
Gerald J. Kissel, P.E., P.A.

2982 Buxton Court
Clearwater, FL 33761

C. Project Location:

1512 38th Avenue East
Bradenton, FL 34208

D. Project Summary:

This project is a Minor Air Construction Permit which authorizes the addition of a new paint booth (Booth #9). An existing sand out booth will be relocated and will exhaust into the baghouse currently serving Booths #7 and #8. Allowable emissions from EU 002 (Painting Operations and Glue Booth) will be increased from 92.5 to 142 tons per year for VOC, from 9.5 to 59 tons per year for any individual hazardous air pollutant (HAP) and from 24.5 to 73.5 tons per year for all HAPs combined. The facility will be subject to the requirements of 40 CFR 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

E. Application Information:

Application received on November 29, 2010
Revised application received on December 23, 2010
Additional information received on January 7, 2011
Application deemed complete on January 13, 2011

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.	Y	Not exempt from general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major facility
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Facility could be a source of unconfined particulate matter emissions

Subject to:	Y/N	Comments
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Facility is a source of VOC and odors
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Manatee County is not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	This is a new source not subject to PM RACT rules
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	Y	Facility is subject to 40 CFR Part 63 Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	Facility will become a Title V source once Paint Booth #9 is installed
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Routine testing is not required

III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
VOC	EU 002-Painting Operations and Glue Booth	142	142
	EU 003-Fire Truck Diesel Engine Emissions during Water Pump Testing	2.5	-
	EU 004 – Three Metal Finishing Booths with Common Baghouse	-	-

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
	VOC Total	**144.5**	**142**
Total HAPs	EU 002-Painting Operations and Glue Booth	73.5	73.5
	EU 003-Fire Truck Diesel Engine Emissions during Water Pump Testing	-	-
	EU 004 – Three Metal Finishing Booths with Common Baghouse	-	-
	Total HAP Total	**73.5**	**73.5**
Individual HAP	EU 002-Painting Operations and Glue Booth	59	59
	EU 003-Fire Truck Diesel Engine Emissions during Water Pump Testing	-	-
	EU 004 – Three Metal Finishing Booths with Common Baghouse	-	-
	Individual HAP Total	**59**	**59**
PM	EU 002-Painting Operations and Glue Booth	-	-
	EU 003-Fire Truck Diesel Engine Emissions during Water Pump Testing	2.13	-
	EU 004 – Three Metal Finishing Booths with Common Baghouse	11.3	-
	PM Total	**13.43**	-
SO_x	EU 002-Painting Operations and Glue Booth	-	-
	EU 003-Fire Truck Diesel Engine Emissions during Water Pump Testing	1.99	
	EU 004 – Three Metal Finishing Booths with Common Baghouse	-	-

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
	SO_x Total	**1.99**	-
NO_x	EU 002-Painting Operations and Glue Booth	-	-
	EU 003-Fire Truck Diesel Engine Emissions during Water Pump Testing	30.2	
	EU 004 – Three Metal Finishing Booths with Common Baghouse	-	-
	NO_x Total	**30.2**	-
CO	EU 002-Painting Operations and Glue Booth	-	-
	EU 003-Fire Truck Diesel Engine Emissions during Water Pump Testing	6.5	
	EU 004 – Three Metal Finishing Booths with Common Baghouse	-	-
	CO Total	**6.5**	-

IV. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

V. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).