Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

Surecrete Design Products
15246 Citrus County Drive
Dade City, Florida 33523

Authorized Representative:
Mr. Steve Thomas, President

Air Permit No. 1010496-004-AO
Permit Expires: 12/14/2016
Site Name: Surecrete Design Products
Minor Air Operation Permit
Project Name: Operation Permit Renewal

This is the final air operation permit, which authorizes operation of a facility that manufactures both water based and solvent based paints. The work is conducted at Surecrete Design Products (Standard Industrial Classification No. 2851). The facility is located in Pasco County at 15246 Citrus County Drive, Dade City, Florida. The UTM coordinates are Zone 17, 383.30 km East, and 3139.91 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice,

regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;
(b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of when and how the petitioner received notice of the agency decision;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, 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 must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

Cindy Zhang-Torres, P.E. Effective Date
Air Permitting Manager
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Mr. Steve Thomas, Surecrete Design Products (stevethomas@surecretedesign.com)

Mr. Tom John, P.E., Tom John, P.E., Incorporated (tjengr@msn.com)

Clerk Stamp

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

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility manufactures and distributes products for decorative concrete. Approximately three drums of hazardous waste (used solvents) are generated and removed from the facility by a licensed hauler per year.

The existing facility consists of the following emissions unit.

Facility ID No. 1010496	
ID No.	Emission Unit Description
001	Paint Blending and Manufacturing

NOTE - *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emissions Units/Activities

The following pollutant-emitting activity is exempt from air permitting in accordance with Rule 62-210.300(3)(b)1, F.A.C. (Generic Emissions Unit or Activity Exemption).

- A small vacuum collector located in an interior area is used to recover any dusts generated from the bagging of pigment, cement and sand and recover those materials for re-use. The collector exhaust is discharged back into the work area.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compound (VOC) and hazardous air pollutants (HAPs).

PERMIT HISTORY/AFFECTED PERMITS

This operation permit renewal replaces Operation Permit No. 1010496-003-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;
b. Appendix B. General Conditions;
c. Appendix C. Common Conditions; and
d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority. *(Permitting Note - See also Section 4. Appendix C (Common Conditions), Condition No. 11.c. for additional AOR requirements.)*
[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application - A completed application for renewal of the air operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an air operation permit, the applicant shall submit the following:

a. the appropriate air permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

c. copies of the most recent two months of the required VOC, HAP and production records specified in Specific Condition No. A.6.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. EU No. 001 – Paint Blending and Manufacturing

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Paint Blending and Manufacturing: The emissions unit blends both water-based and solvent-based paints and coatings from raw materials, and packages the finished product into containers. The solvents to be incorporated into the paints or coatings are received in 55-gallon drums, totes, and pails. Specific solvents and nonvolatile paint materials (pigment, resin, additive, defoamer and surfactants) are pumped from the totes or drums into cylindrical open top mixing containers (e.g. totes). The finished product is later transferred for filling into containers (usually one gallon or five gallon). Tank cleaning, when necessary, is performed by adding water to the tanks containing water based paints and a solvent, typically xylene or butylcellosolve (ethylene glycol mono butyl ether), to the solvent based paint tanks. The solvent is mixed in the covered tank to re-dissolve the paint. Subsequently, the solvent/paint may be transferred to a holding tank for addition to a similar batch of paint, or utilized directly as the starting point for the next batch of product. Material such as pigment is added to a mixture of sand and cement and bagged using an air packer. A small vacuum collector located in an interior area is used to recover any dusts generated from the bagging of pigment, cement and sand and recover those materials for re-use. The collector exhaust is discharged back into the work area. This is identified as an exempt activity.

PERFORMANCE RESTRICTIONS

A.1. Operating Hours - The hours of operation are not limited (i.e., permitted for 8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (Definition of Potential to Emit), F.A.C.; Construction Permit 1010496-002-AC]

EMISSIONS STANDARDS

A.2. VOC Emissions Limitation – Total emissions of volatile organic compounds (VOC) shall not exceed 4.9 tons per any consecutive 12-month period.
[Construction Permit 1010496-002-AC]

A.3. HAP Emissions Limitation – Total emissions of hazardous air pollutants (HAP) shall not exceed 4.9 tons per any consecutive 12-month period.
[Construction Permit 1010496-002-AC]

A.4. General Pollutant Emission Limiting Standards: Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions . In addition to complying with the Appendix C, Condition No. 6 (attached), the facility shall comply with the following:

a. Perform mixing operations with vessel lids in place;

b. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials.

c. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.

d. Tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use.

e. Prevent excessive air turbulence across exposed VOCs.

f. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

g. Perform bottom filling of mixing tanks whenever feasible.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit 1010496-002-AC]

A.5. General Pollutant Emissions Limiting Standards: Unconfined Particulate Emissions: In order to provide reasonable assurance that the measures stated in Section, Appendix C, Condition No. 9. and vacuum dust collector in the interior area for bagging of pigment, cement and sand are effective in controlling unconfined emissions of particulate matter, visible emissions from the building openings or vents should not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but an indication that additional controls may be required.
[Rule 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1010496-002-AC]

RECORDKEEPING REQUIREMENTS

A.6. **VOC/HAP Records -** In order to document compliance with the VOC/HAP limitations of Specific Condition Nos. A.2. and A.3., the permittee shall maintain a monthly log based on the tracking of all HAP and/or VOC containing material used in association with manufacturing activities. The logs shall at a minimum, contain the following:

a. The monthly total VOC emissions along with the most recent consecutive 12-month period total of VOC emissions (in Tons), segregated by activity source (e.g. Paint manufacturing, Solvent Cleaning).

b. The monthly total HAP emissions along with the most recent consecutive 12-month period total of HAP emissions (in Tons), segregated by activity source (e.g. Paint manufacturing, Solvent Cleaning).

c. VOC and HAP emissions shall be calculated from the amount of material processed/used based upon the following methods unless otherwise directed by the Department:

1. Paint Manufacturing – Emissions shall be determined by mass composition analysis of raw materials (monthly usage) for VOC/HAP content and assuming 40 lbs. of emission per ton of VOC/HAP processed.

2. Solvent Cleaning – Emissions shall be determined by mass composition analysis of solvents (monthly usage) for VOC/HAP content and assuming 100% emissions for that amount of solvent not recovered or disposed of.

All records shall contain the Facility Name, Facility ID No., Emission Unit No., and Month/Year. Supporting documentation such as VOC/HAP content, MSDS sheets, purchase orders, etc. shall be kept for each material processed which includes sufficient information to determine emissions. Purchases of materials may be used as an acceptable estimate for usage and emissions, provided no materials are used which are not purchased.

If this is not done, for each chemical where the emission rate is not assumed equal to the usage, documentation shall be kept as to how emissions were calculated from usage (i.e. credit for material recovered/recycled, source/process specific emission factors used, operating hours basis, etc.).
[Rule 62-4.070(3), F.A.C.; Construction Permit 1010496-002-AC]

A.7. Records Retention: The records required by this permit shall be completed by the end of the following month. The logs shall be retained on file at this facility for at least three years, and be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1010496-002-AC]