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

DRAFT PERMIT

PERMITTEE

Thomas Sign & Awning Company, Inc.
4590 118th Avenue North
Clearwater, FL 33762

Authorized Representative:
Ms. Priscilla Thomas, President

Air Permit No. 1030154-001-AC
Permit Expires: 07/01/2013
Site Name: Thomas Sign & Awning Company, Inc.
Minor Air Construction Permit
Project Name: Surface Coating Facility Re-permitting

This is the final after-the-fact air construction permit for a surface coating facility. The facility (Standard Industrial Classification No. 3993) is located in Pinellas County at 4590 118th Avenue North in Clearwater, Florida. The UTM coordinates are Zone 17, 333.1 km East, and 3084.9 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

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

Due to 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 (Mail Station #35, 3900 Commonwealth Boulevard, 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida
DRAFT

_____ _____

Robert C. Wong Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, 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.

Ms. Priscilla Thomas
Thomas Sign & Awning Company
pris.thomas@thomassign.com

Mr. Charles Copp
Thomas Sign & Awning Company
charlie.copp@thomassign.com

Mr. Barry Westmark
Environmental Consulting & Technology
bwestmark@ectinc.com

Mr. Gary Robbins
Pinellas County Air Quality Division
grobbins@co.pinellas.fl.us

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.

DRAFT

_____ _____
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Thomas Sign & Awning Company, Inc.

This project is for an after-the-fact air construction permit for a sign manufacturing facility. The facility utilizes two paint spray booths and a brush painting area for the coating of metal and plastic sign parts and metal sign posts.

This project will create the following emissions unit.

Facility ID No. 1030154	
ID No.	Emission Unit Description
001	Surface Coating Operations

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

Exempt Emission Units/Activities

The following emission sources or activities are exempt from air permitting requirements pursuant to Rule 62-210.300(3)(a), F.A.C.:

- Internal combustion engines in vehicles.
- Belt and drum sanders.
- Brazing, soldering or welding equipment.
- Emergency generators (stationary reciprocating internal combustion engines).
- Degreasing units (non-HAP solvents).
- Fire and safety equipment.
- Non-halogenated solvent storage and cleaning.
- Printing operations.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- 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 volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The emissions limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source/PSD major source.

  {Federal NESHAP Applicability Note: This facility could be subject to Federal NESHAP 40 CFR 63 Subpart HHHHHH (National Emissions Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources) if it uses coatings containing the target HAPs of chromium (Cr), nickel (Ni), cadmium (Cd), lead (Pb), or manganese (Mn), or uses methylene chloride (MeCl) as a chemical stripper. Should the permittee become subject to this subpart, it

shall comply with all its applicable provisions. As of the effective date of this permit, this rule has not been adopted by the State of Florida.}

PERMIT HISTORY/AFFECTED PERMITS

This is the after-the-fact air construction permit for this existing facility. The facility was initially permitted in 1989, but was then determined to be exempt in 1995 (*Note: At the current location, operation commenced in 1994*). Following an inspection conducted by the Pinellas County Air Quality Division in September 2011 that indicated the facility no longer met the exemption criteria, the Department issued Notice of Permit Determination in February 2012 requiring the facility to again obtain an air pollution permit.

ADMINISTRATIVE REQUIREMENTS

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 Pinellas County Air Quality Division (PCAQD). The mailing address and phone number of the Local Air Program is:

   Pinellas County Air Quality Division
   300 South Garden Avenue
   Clearwater, Florida 33756
   Telephone: 727-464-4422

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.
   [Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit: This permit authorizes construction or modification of the permitted emissions unit and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit no earlier than 90 days and no later than 120 days after issuance of this permit. To apply for a Non-Title V air operation permit, the applicant shall submit the following:
   a. the appropriate 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.; and
   c. copies of the two most recent months of records/logs specified in Specific Condition Nos. A.5. and A.6.

   The application shall be submitted to the Permitting Authority with a copy to the Pinellas County Air Quality Division (Compliance Authority).

   [Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

FACILITY-WIDE SPECIFIC CONDITIONS

9. Objectionable Odor Prohibited: The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "Objectionable Odor" is defined as any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
   [Rules 62-210.200 (Objectionable Odor) and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]

A. EU No. 001 – Surface Coating Operations

This section of the permit addresses the following emissions unit.

ID No.	Emissions Unit Description
001	Surface coating is conducted in two paint spray booths (for painting of metal and plastic sign parts) and a brush application area (for painting of structural steel supports). Paint booth No. 1 (Binks Manufacturing Company, Model TFC-16-14) is located in the southeast corner of the building. Paint booth No. 2 (Binks Manufacturing Company, Model FEC-10-7) is located along the eastern wall of the building. The brush painting activities are conducted just outside a roll-up bay door in the southeast corner of the building. Paint booth No. 1 exhausts through three stacks, while paint booth No. 2 exhausts through a single stack. Particulate matter emissions from overspray in the two paint spray booths are controlled by fiber filters. The coatings used in this operation contain VOC and HAP components, which result in the emissions of these regulated pollutants. Surface coating of metal parts and products only is subject to the Volatile Organic Compound Reasonably Available Control Technology (VOC RACT) requirements of Rule 62-296.513, F.A.C. (*Surface Coating of Miscellaneous Metal Parts and Products*).

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation: The hours of operation are not limited (i.e., 8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.2. Paint Spray Booth Overspray Filters: The permittee shall not circumvent the paint spray booth air pollution control equipment (fiber filters) or allow the emissions of air pollutants without this equipment operating properly. In order to provide reasonable assurance the overspray control systems are adequately controlling emissions of uncontrolled particulate matter from the spray booths, visible emissions from the paint spray booth exhausts should not exceed 5% opacity. Exceedance of the 5% limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices (filter maintenance or replacement) may be necessary.
[Rules 62-4.070(3), and 62-210.650, F.A.C]

EMISSIONS STANDARDS

A.3. VOC RACT Emission Limiting Standards: In accordance with Rule 62-296.513, F.A.C. (VOC RACT – Surface Coating of Miscellaneous Metal Parts and Products), the permittee shall comply with the following (*only applies to the surface coating of metal parts and products*):

a. VOC emissions shall not exceed 3.5 pounds per gallon of coating (excluding water), delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 194 degrees Fahrenheit;

b. VOC emissions shall not exceed 4.3 pounds per gallon of coating (excluding water), delivered to a coating applicator that applies clear coatings;

c. All VOC emissions from solvent washings shall be considered in the emission limitations in items a. and b. above, unless the solvent is directed into containers that prevent evaporation into the atmosphere.

d. Compliance may be demonstrated on a 24-hour weighted average basis for a single emissions unit point with a single emission limit.

[Rules 62-296.500(5), 62-296.513(2)(a) and 62-296.513(2)(c), F.A.C.]

A.4. VOC/HAP Emissions Limits: Emissions from this emissions unit shall not exceed the following:

Pollutant	**Emissions Limit** (tons per any consecutive 12-month period)
VOC (Volatile Organic Compounds)	22.8
Total HAPs (Hazardous Air Pollutants)	8.6

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
{*Permitting Note: The limits were requested in air construction permit application received on 04/27/12.*}

RECORDS AND REPORTS

A.5. Daily RACT Records for Metal Surface Coating Operations: In order to document compliance with the VOC emission limitations of Specific Condition No. A.3., the permittee shall maintain, at a minimum, the following daily records:

a. Facility name, facility ID No., emissions unit ID No., and description (i.e., Thomas Sign & Awning Company, 1030154, EU 001, Surface Coating Operations);
b. Date;
c. The applicable rule (e.g., Rule 62-296.513(2)(a)2., F.A.C.);
d. The application method and substrate type (i.e., metal);
e. The amount and type of coatings (including catalyst and reducer for multicomponent coatings) and/or solvent, including exempt compounds;
f. The VOC content as applied in each coating and/or solvent;
g. The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each.

[Rules 62-4.070(3) and 62-296-500(2)(b), F.A.C.]

A.6. VOC/HAP Monthly Records: In order to document compliance with the VOC and HAP emissions limitations of Specific Condition No. A.4., the permittee shall maintain monthly records. These records may be based on the beginning and ending inventories, deliveries, shipments, etc. At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC/HAP emissions, provided that no materials are used which are not purchased. The monthly records shall include, but not be limited to, the following information:

a. Facility name, facility ID No., emissions unit ID No., and description (i.e., Thomas Sign & Awning Company, 1030154, EU 001, Surface Coating Operations);
b. Month, year, and method used for records (usage or purchase);

VOC Monthly Records

c. The quantity (gallons) and VOC content (pounds per gallon) of each VOC-containing material (surface coatings and solvents) used for the month;

d. The calculated monthly total VOC emissions, in tons;

e. A cumulative total of the VOC emissions for the most recent consecutive 12-month period, in tons;

HAP Monthly Records

f. The quantity (gallons) and HAP content (pounds per gallon) of each HAP-containing material (surface coatings and solvents) used for the month;

g. The calculated monthly HAP emissions for total HAPs, in tons.

h. A cumulative total of the HAP emissions for total HAPs for the most recent consecutive 12-month period, in tons.

[Rule 62-4.070(3), F.A.C.]

A.7. Documentation: Supporting documentation (e.g., MSDS sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for the records required by Specific Condition Nos. A.5. and A.6., which shall include sufficient information to determine VOC and HAP emissions, shall also be kept. These records may be maintained in either a hardcopy or electronic format.
[Rule 62-4.070(3), F.A.C.]

A.8. Records Retention: The records shall be maintained at the facility for at least 3 years and made available to the Permitting and Compliance Authorities upon request. Daily records shall be completed within 10 business days and monthly records shall be completed by the end of the following month. These records may be maintained in either a hardcopy or electronic format.
[Rules 62-4.070(3) and 62-4.160, F.A.C.]