FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

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LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

United Steel Works, Inc.
12255 44th Street North
Clearwater, FL 33762

Air Permit No. 1030156-004-AO
Permit Expires: 11/18/2019
Minor Air Operation Permit
Project: Air Operation Permit Renewal

Authorized Representative:
Mr. Robert C. Growe, Vice President

This is the final permit to renew Air Operation Permit No. 1030156-003-AO for a metal product fabrication and surface coating operation at the United Steel Works, Inc. facility (Standard Industrial Classification No. 3441). The facility is located in Pinellas County at 12255 44th Street North in Clearwater, Florida. The UTM coordinates are Zone 17, 333.39 km East, and 3085.48 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

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

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this final permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile 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 each petitioner received notice of the agency action or proposed 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 the 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 Permitting Authority'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, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this final permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority 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

_____ _____
Kelley M. Boatwright Effective Date
Permitting & Waste Cleanup 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 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 the date indicated below to the persons listed below.

Robert C. Growe, Vice President, United Steel Works, Inc. (rgrowe@barfab.org)

Gary Wayman, Safety Coordinator, United Steel Works, Inc. (gwayman.usw@barfab.org)

Sherrill Culliver, Pinellas County Air Quality Division, (sculliver@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.

_____ _____
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility consists of a paint spray area at a facility to coat fabricated metal products subject to the Volatile Organic Compound (VOC) Reasonably Available Control Technology (RACT) requirements of Rule 62-296.513, F.A.C. The existing facility consists of the following emissions unit (EU).

Facility ID No. 1030156

EU ID No.	Emissions Unit Description
001	Paint Spray Area

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

Exempt Emission Sources/Activities

- The facility has no current exempt activities.

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 the pollutant VOC.

PERMIT HISTORY/AFFECTED PERMITS

This permit renews and replaces Air Operation Permit No. 1030156-003-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

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

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
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. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to Pinellas County Air Quality Division (Compliance Authority) no later than 60 days prior to the expiration date of this operation permit. To properly apply for an 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 most recent month of records/logs specified in Specific Condition No. A.9.

[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 Spray Area

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Paint Spray Area – A paint spray area located in the southeast corner of the facility is used to coat fabricated metal products. The painting activities are subject to the VOC RACT requirements of Rule 62-296.513 F.A.C.

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation shall not exceed 2,080 hours per any consecutive 12-month period.
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.; Construction Permit AC52-161943]

EMISSIONS STANDARDS

A.2. VOC Emissions Standard – This emission unit shall not exceed the following VOC emission limitations:

VOC Source	VOC, pounds per month	VOC, tons per year*
Surface Cleaning (wipe down)	169.00	1.01
Painting	834.17	5.01
Clean-Up	19.72	0.12
TOTAL	1,022.89	6.14

*Year is defined as any consecutive 12-month period.

[Rule 62-296.513, F.A.C.; Construction Permit AC52-161943]

A.3. VOC RACT Limitation – This emission unit is limited to the use of low solvent coatings (less than or equal to 3.5 pounds VOC/gallon of coating less water and exempt solvents).
[Rule 62-296.513, F.A.C.; Construction Permit AC52-161943]

A.4. Equipment Clean-Up Requirements – All VOC emissions from solvent washings shall be considered in the emission limitations in Rule 62-296.513 F.A.C. unless the solvent is directed into containers that prevent evaporation into the atmosphere.
[Rule 62-296.513, F.A.C]

A.5. Objectionable Odor Prohibited – No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is 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 and 62-296.320(2) F.A.C.; Pinellas County Code, Section 58-178 and Construction Permit AC52-161943]

A.6. VOC Emission work Practice Requirements – All equipment, pipes, hoses, lids, fittings, etc. shall be operated and maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials.
[Rule 62-296.320(1) F.A.C.; Construction Permit AC52-161943]

A.7. Other VOC Emission Work Practice Requirements – The permittee shall not sore, pump, handle, process, load, unload or use in any process of installation VOC without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Procedures to minimize VOC emissions shall include, but not be limited to the following:

a. Maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.

b. Prevent excessive air turbulence across exposed VOC.

c. Where possible and practical, procure or fabricate a tightly fitting cover for any open trough, basin, bath, etc., of VOC so that it can be covered when not in use.

d. All fittings, vale lines, etc. shall be properly maintained.

e. All VOC spills shall be attended to immediately and waste properly disposed of, recycled, etc.

[Rule 62-296.320(1) F.A.C.]

A.8. Unconfined Particulate Matter – All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Curtailing operations if winds are entraining the paint overspray.

b. Using a barrier to curtail emissions, if necessary.

c. In order to provide reasonable assurance that the above measures are being implemented and that they are effective in controlling unconfined emissions of particulate matter, visible emissions 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.

[Rules 62.4.070(3) and 62-296.320(4)(c), F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.9. Recordkeeping Requirements – In order to document compliance with the limitations of Specific Condition Nos.A.1., A.2. and A.3., the permittee shall keep a log of operations for the facility. The log shall record the following at a minimum:

Daily:

a. name, facility ID No., emission unit ID No., and description (i.e., United Steel Works, Inc.., 1030156, EU 001, Paint Spray Area);

b. day, month and year

c. the application method and substrate type (metal, plastic, paper, etc.)

d. The daily quantity of each coating or solvent used and VOC emitted for each activity (coating, surface cleaning or clean-up)

e. Daily hours of emission unit operation

Monthly:

f. Month and year.

g. Total VOC emissions in pounds for each of the limits listed in Specific Condition No. A.2. (i.e. surface cleaning, painting, clean-up and the total)

h. The most recent 12 consecutive month period cumulative VOC emission rate (in tons per 12 consecutive month period) based on g. above.

i. Total monthly hours of emission unit operation.

j. Most recent rolling 12-month average of monthly hours of operation.

[Rules 62-296.500(2)(b) and 62-4.070(3) F.A.C.; Construction Permit AC52-161943]

A.10. Documentation - Supporting documentation (e.g., MSD sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) which include sufficient information to determine VOC usage by weight, shall be kept at the facility for every VOC containing material used. Documentation for VOCs reclaimed, recycled, disposed or used for clean-up shall use a mass balance method to determine net usage (amount used minus amount collected for disposal or recycle).
[Rules 62-296.500(2)(b) and 62-4.070(3) F.A.C.; Construction Permit AC52-161943]

A.11. Records Completion and Retention - Daily records required by Specific Condition No. A.9. shall be completed within three (3) business days. The monthly records shall be completed by the end of the following month. The records shall be maintained in a form suitable for inspection by the Department upon request and shall be kept at the facility for a minimum of the most recent three (3) year period.
[Rule 62-4.070(3), F.A.C]