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

Allen Industries, Inc.
11351 49th Street North
Clearwater, FL 33762

Air Permit No. 1030186-006-AC
Permit Expires: 02/28/2013
Minor Air Construction Permit
New Indoor Paint Spray Booth

Authorized Representative:
Mr. Ray Ryals, Vice President-Manufacturing

This is the final air construction permit, which authorizes construction of a new indoor paint spray booth (Booth No. 5) at the existing sign materials coating and fabrication facility (Standard Industrial Classification No. 3993) located in Pinellas County at 11351 49th Street North in Clearwater, Florida. The UTM coordinates are Zone 17, 332.72 km East, and 3084.54 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

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. 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

_____ _____

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.

Mr. Ray Ryals, Allen Industries, Inc.
(ray.ryals@allenindustries.com)

Lynn Robinson, P.E., Southern Environmental Sciences, Inc.
(lrobinson@sesfla.com)

Mr. Gary Robbins, Environmental Program Coordinator - Pinellas Co. Air Quality Division
(grobbins@pinellascounty.org)

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

This facility is a sign materials surface coating and fabrication plant. The existing facility consists of the following emissions unit (EU).

Facility ID No. 1030186	
EU ID No.	Emission Unit Description
004	Surface Coating Operations consisting of Four (4) Indoor Paint Spray Booths (Booth Nos. 1, 2, 3, and 4); and an Outdoor Painting Area

Project Description and Affected/Emission Unit

The project is the addition of a new indoor paint spray booth (Booth No. 5) to the existing facility, which currently includes four (4) indoor paint spray booths. The new booth (including spray and filter equipment) will be entirely supplied by Autek Spray Booths, Inc. and will be equipped with filtered entrance doors. The purpose of the new paint booth (Booth No. 5) is to improve the quality of the finished painted metal products through fewer dust particles in the finished paint surface (achieved by better booth air filtration). This new booth will essentially, though not entirely, replace Booth No. 1 for the indoor surface coating of metal parts. (Booth No. 1 will be shut down for renovation upon start of operation of new Booth No. 5). Equipment clean up for the indoor booths is performed in a modified sink, which drains solvents into a sealed 5-gallon can. Solvents are poured, not sprayed. Vapors will be exhausted from the new booth through a filter-equipped ventilation system.

The painting of the metal sign parts is subject to the restrictions of the VOC Reasonably Available Control Technology (RACT) requirements of Rule 62-296.513, F.A.C. (i.e., 3.5 pounds VOC per gallon of coating, less water and exempt solvents). There will be no increase in potential volatile organic compounds (VOC) or hazardous air pollutant (HAP) emissions from the facility as there will be no change to the currently permitted maximum allowable VOC and HAP emission limitations.

This project will modify the following emissions unit by adding one additional indoor paint spray booth (Booth No. 5).

EU ID No.	Emission Unit Description
004	Surface Coating Operations consisting of **Five (5)** Indoor Paint Spray Booths (Booth Nos. 1, 2, 3, 4, <u>and **5**</u>); and an Outdoor Painting Area

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

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 pollutants VOC and HAPs.

(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 the coatings used at the facility contain the targeted HAPs of Chromium (Cr), nickel (Ni), cadmium(Cd), or lead(Pb) at a concentration >0.1%, or Manganese (Mn) at a concentration > 1.0%, or use MeCl as a chemical stripper. Based upon supplemental information submitted as part of the application for this permit, the permittee has determined that they do not use any coatings containing the targeted HAPs, and are therefore currently not subject to this Federal NESHAP.)

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Construction Permit 1030186-003-AC. Reference also current facility Operation Permit 1030186-005-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 Pinellas County Air Quality Division local program. The mailing address and phone number of the local program is:

Pinellas County Air Quality Division
300 South Garden Avenue
Clearwater, FL 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 Revision - This permit authorizes modification of the permitted emissions unit and initial operation to determine compliance with Department rules. A Non-Title V air operation permit revision is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit revision, 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 Nos. A.8. and A.9.

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. General Pollutant Emission Limiting Standards: 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 (Definition of Objectionable Odor), and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]

A. EU No. 004 – Surface Coating Operations

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

EU ID No.	Emission Unit Description
004	Surface Coating Operations consisting of Five (5) Indoor Paint Spray Booths (Booth Nos. 1, 2, 3, 4, **and 5** (*the new booth that is the subject of this construction permit*)**;** and an Outdoor Painting Area The five (5) indoor paint spray booths are located on the North side of the facility building. The booths are numbered 1 through 5 from west to east. Existing Booth Nos. 1 through 4 are built in place booths, and new Booth No. 5 will be an Autek Cross Flow Paint Spray Booth supplied by Autek Spray Booths, Inc. These booths are used interchangeably to paint metal sign parts, to apply masking material with zero VOC emissions, and to apply paint to the plastic faces of commercial signs. (Booths 2, 3 and 4 are used primarily for surface coating plastic parts, while Booths 1 and 5 are used primarily for surface coating metal.) The painting of the metal sign parts is subject to the restrictions of the VOC RACT (3.5 pounds VOC per gallon of coating, less water and exempt solvents). Equipment clean up is performed in a modified sink, which drains solvents into a sealed 5-gallon can. Solvents are poured, not sprayed. Vapors are exhausted from the booth through a filter-equipped ventilation system. The outdoor painting area is used for painting both plastic faces of commercial signs and metal sign structural parts. The painting of the metal sign parts is subject to the VOC RACT (3.5 pounds VOC per gallon of coating, less water and exempt solvents). Lacquer thinner is used for surface preparation. Paints are applied with disposable brushes.

PERFORMANCE RESTRICTIONS

A.1. Operating Hours - The hours of operation of this emissions unit are not limited (i.e., permitted for 8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (Potential to Emit), F.A.C.; Construction Permit 1030186-003-AC]

A.2. Spray Booth Overspray Filters - The permittee shall not circumvent the paint spray booth air pollution control equipment (booth fiber filters on the ventilation systems to control paint overspray) or allow the emission 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,; Construction Permit 1030186-003-AC]

EMISSIONS STANDARDS

A.3. VOC and HAP Emission Limitations – In order to establish the facility as a non-Title V minor source of VOC and HAP emissions, the following maximum allowable VOC and HAP emission limitations shall apply to the surface coating operations of EU No. 004:

Pollutant(s)	**Emission Limitations** (maximum tons/consecutive 12 month period)
Total Volatile Organic Compounds (VOC)	48.0
Any Individual Hazardous Air Pollutant (HAP)	9.0
Total Hazardous Air Pollutants (HAPs)	20.0

[Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit 1030186-003-AC]

A.4. VOC Reasonably Available Control Technology (RACT) Coating Limitations for Metal Surface Coating - In accordance with Rule 62-296.513, F.A.C. (VOC RACT - Surface Coating of Miscellaneous Metal Parts and Products), when surface coating/painting metal parts or products the permittee is limited to the use of coatings/paints with a volatile organic compound (VOC) content not to exceed 3.5 pounds VOC per gallon of coating, less water and exempt solvents. Emissions from solvent washings shall be included in the above limitation unless the wash solvent is directed into containers that prevent vapor loss to the atmosphere. [Rules 62-296.500(4), 62-296.513(2)(a)2 and 62-296.513(2)(c), F.A.C.]

A.5. General Pollutant Emission Limiting Standards – Fugitive Volatile Organic Compounds (VOC) or Organic Solvents (OS) Emissions - The permittee shall not store, pump, handle, process, load, unload, or use in any process or installation, OS, or VOCs without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The permittee shall comply with the following:

a. 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.
b. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.
c. Tightly cover or close all VOC containers when they are not in use.
d. Prevent excessive air turbulence across exposed VOCs.
e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.
f. Solvents from paint gun pot cleaning shall be considered to have negligible emissions only if they are directed by pouring into closed containers.
g. Clean-up solvents are not required with the use of disposable brushes.

[Rule 62-296.320(1), FAC; Construction Permit 1030186-003-AC]

NOTIFICATION REQUIREMENTS

A.6. Notification of Commencement of Operation of New Paint Spray Booth (Booth No. 5) - The permittee shall notify the Permitting Authority and the Compliance Authority in writing of the date of commencing operation of the new indoor paint spray booth (Booth No. 5), no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

COMPLIANCE RECORDKEEPING REQUIREMENTS

A.7. Coating VOC Content Determination - Compliance with Specific Condition Nos. A.3. and A.4. shall be determined based the VOC content of each coating being applied using EPA Method 24 or 24A contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. Certification under EPA 450/3-84-019, if properly completed for each affected coating, may be submitted in lieu of the EPA Method 24 or 24A tests. New coatings or the same coatings supplied by a different manufacturer shall be tested for VOC content using EPA Method 24, 24A, or the above mentioned certification test method prior to use. For use of coatings different from those included in previous permit applications (i.e., new coatings or coatings supplied by a different manufacturer), submit the new coating(s) test results to the Permitting and Compliance Authorities within 30 days of initial use. The permittee shall maintain records of VOC content of all coatings used in a form suitable for inspection and make them available to the Permitting Authority or Compliance Authority upon request.
[Rule 62-296.513(4) and Chapter 62-297, F.AC.; 40 CFR 60 Appendix A; Construction Permit 1030186-003-AC]

A.8. Surface Coating VOC Recordkeeping Requirements - In order to document continuing compliance with the volatile organic compounds (VOC) emission limitations of Specific Condition Nos. A.3 and A.4., the permittee shall maintain, at a minimum, the following records for surface coating operations:

a. Daily RACT Records for Metal Surface Coating Operations – In accordance with Rule 62-296.500(2)(b) (VOC RACT Recordkeeping Requirements), F.A.C., the permittee shall maintain daily logs which shall include but not be limited to the following information:

1. the applicable rule (i.e., Rule 62-296.513(2)(a)2.and 62-296.513(3), F.A.C.);
2. facility name and Facility ID (i.e., Allen Industries, Inc., Facility ID 1030186);
3. the substrate type being coated (i.e., metal);
4. the emission unit number and description of specific location of application (i.e., EU No. 004, Spray Paint Booth No. 1, 2, 3 , 4 or 5; or outdoor painting area);
5. date (month, day, year);

(continued)

A.8. a. *(continued)*

6. on a daily basis, what "As Applied" coating (by identification number) was used, indicating the amount of each used in gallons or pounds;
7. on a daily basis, all other VOC and solvents used for surface preparation, clean-up, and wash-up, indicating the amount of each used in gallon or pounds;
8. on a daily basis, calculate the amount of emissions from the wash solvents (equipment clean-up) that are not directed into containers that prevent evaporation into the atmosphere for disposal (pounds); and
9. the VOC content as applied (pounds VOC per gallon of coating as applied) for each type of coating utilized.

b. Monthly VOC Records for All Surface Coating Operations – In order to show compliance with the VOC emission limitation of Specific Condition No. A.3., the permittee shall maintain monthly records for all VOC containing materials associated with the surface coating operations. The records shall contain, at a minimum, the following for the month:

1. General Record Identification:
   i. facility name and Facility ID (i.e., Allen Industries, Inc., Facility ID 1030186);
   ii. the emission unit (i.e., EU No. 004); and
   iii. month and year of the record.
2. For each coating:
   i. name/description of coating;
   ii. VOC content of coating (percent by weight if usage recorded in pounds or lbs/gallon coating, excluding water, as applied, if usage recorded in gallons); and
   iii. the quantity of coating used/month (pounds or gallons).
3. For each VOC containing solvent used for surface cleaning or equipment clean-up used:
   i. name/description of solvent;
   ii. VOC content of solvent (percent by weight if usage recorded in pounds or lbs/gallon if usage recorded in gallons); and
   iii. the quantity of solvent used/month (pounds or gallons).

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A.8. b. *(continued)*

4. The calculated (based upon coating/solvent VOC content and usage) total VOC emissions for:
   i. each coating and solvent (pounds/month); and
   ii. the entire surface coating operation (pounds/month); and
   iii. cumulative VOC emissions for the most recent consecutive 12-month period (tons/12 consecutive month period).

[Rules 62-4.070(3), 62-296.500, and 62-296.513, F.A.C.; Pinellas County Code 58-90; Construction Permit 1030186-003-AC]

A.9. HAP Recordkeeping Requirements - In order to document compliance with the hazardous air pollutant (HAP) limitations of Specific Condition No. A.3., the permittee shall maintain monthly records for all HAP containing materials* associated with the surface coating operations. *(*This includes, but is not limited to, paint, inks, coating, thinner, solvents and other material used in the surface coating operations which contain HAPs.)*

a. The records shall contain, at a minimum, the following for the month:
   1. General Record Identification:
      i. facility name and Facility ID (i.e., Allen Industries, Inc., 1030186);
      ii. the emission unit (i.e., EU No. 004); and
      iii. month and year of the record.
   2. For each HAP containing coating or solvent used:
      i. name/description of coating or solvent;
      ii. HAP content of coating (as applied) or solvent (percent by weight if usage recorded in pounds or lbs/gallon if usage recorded in gallons) for each individual HAP contained in the coating or solvent;
      iii. the quantity of coating or solvent used/month (pounds or gallons).
   3. The calculated (based upon coating/solvent HAP content and usage) HAP emissions for each individual HAP from:
      i. each coating and solvent (pounds/month) and
      ii. the entire surface coating operation (pounds/month).
   4. A calculation of the following:
      iii. cumulative HAP emissions for each individual HAP and total HAPs for the most recent consecutive 12-month period (tons/12 consecutive month period).

[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90/94; Construction Permit 1030186-003-AC]

(VOC and HAP Recordkeeping Permitting Note - The monthly (or daily) VOC and HAP records required in Specific Condition Nos. A.8. and A.9. may be kept in a combined record/spreadsheet.)

A.10. VOC and HAP Record Documentation and Maintenance Requirements – The following requirements apply to the VOC and HAP records required in Specific Condition Nos. A.8. and A.9. above.

a. The records shall include paint, inks, coating, thinner, solvents and other material used in the surface coating operations which contain VOC or HAPs.)

b. Supporting documentation (e.g., MSDS sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for the records required above, which shall include sufficient information to determine VOC and HAP emissions, shall also be kept. At the permittee's option, "quantity purchased" may be reported to satisfy the requirement of "quantity used", provided no materials are used which are not purchased. The records shall specify the method used for emission determination (i.e., material purchased or used).

c. Documentation of solvents consumed, such as during spray paint gun/hose cleanup, may use a mass balance method to determine usage (amount used minus amount collected for disposal or recycle).

d. Daily Records shall be completed within five (5) calendar days. Monthly records shall be completed within 15 days of the end of the month.

e. The records required in this permit shall be maintained at the facility for a minimum of three (3) years (except where otherwise specified) and made available to the Permitting Authority or Compliance Authority upon request.

[Rules 62-4.070(3) and Chapter 62-296, F.A.C.; Pinellas County Code 58-90; Construction Permit 1030186-003-AC]