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

ITW SprayCore
Illinois Tool Works, Inc.
Clearwater, FL 33760

Air Permit No. 1030501-007-AC
Permit Expires: 06/30/2013
Minor Air Construction Permit
Install Spray Booth

Authorized Representative:
Mr. Richard Hanisko, Operations Manager

This is the final air construction permit to install a spray booth at a facility that manufactures formulations of resin based products. The proposed work will be conducted at the ITW SprayCore facility (Standard Industrial Classification No. 2821). The facility is located in Pinellas County at 11701 56th Court North in Clearwater, Florida. The UTM coordinates are Zone 17, 331.8 km East, and 3084.7 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.

Richard Hanisko, ITW SprayCore (rhanisko@spraycore.com)
Scott A. McCann, P.E., Golder Associates Inc. (smccann@golder.com)
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

The existing facility is primarily involved in the processing (mixing) of bulk resins, including styrene monomers and other formulation components such as promoters, into various styrene based products for use mainly by the fiberglass boat industry. The final products are largely filled resin and putty-like resin coatings stored and shipped in lined and unlined drums (55-gallons) or smaller containers (5-gallons).

Facility ID No. 1030501	
ID No.	Emission Unit Description
001	Formulation of Resin Based Products

Project Description and Proposed Emission Unit

This project is for the construction of a spray booth to test the quality of the resin-based products. The emissions limits will not change. This project will add the following emissions unit.

Facility ID No. 1030501	
ID No.	Emission Unit Description
002	Spray Booth

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 (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 VOC (Volatile Organic Compounds) and HAPs (Hazardous Air Pollutants).
- The spray booth is not subject to the requirements of 40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. [Section 63.11169(d)(5)]

PERMIT HISTORY/AFFECTED PERMITS

Modifies and Replaces Permit No. 1030501-001-AC

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

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).

   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;
   d. Appendix D. Common Testing Requirements; and
   e. Appendix UEF. Unified Emission Factors for Open Molding of Composites.

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. General Standards: Objectionable Odor**:** 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.

   (Permitting Note: If the Department or the Pinellas County Air Quality Division (PCAQD) receives a valid odor complaint, the Department or PCAQD reserves the right to require that additional odor control measures/work practices be implemented. These measures or practices may, for example, require that building doors (including overhead rollup doors) and windows be closed when conducting any mixing and related operations in order to ensure the emissions are captured and discharged with adequate dispersion.)

   [Rules 62-210.200 ("Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]

8. General Standards: Unconfined Particulates : All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include, but not be limited to the measures shown below.

   a. Particulate matter emissions associated with the raw materials mixing activities (including raw material delivery via the conveyor and hose line systems) and abrasive grinding are to be controlled by good work practices and housekeeping procedures.

   b. All mixing activities (including raw material delivery via the conveyor and hose line systems) and abrasive grinding are to be performed inside the main production building.

   [Rules 62-296.320(4)(c), F.A.C.; Construction Permit 1030501-001-AC]

9. Fugitive Emissions Opacity Standard: As an indicator that the precautions to control unconfined particulate matter emissions as required by Specific Condition No. 8 are adequate, emissions of unconfined particulate matter from the main production building should not exceed 5%. If this value is exceeded, it shall not be a violation in and of itself, but an indication that additional control precautions and/or work practices beyond those of Specific Condition No. 8 may be necessary.
   [Construction Permit 1030501-001-AC]

10. 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.]

11. Application for Non-Title V Air Operation Permit: This permit authorizes construction of the spray paint booth 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(s). 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, 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(s). A.1., B.2., C.4. and C.6. (*if applicable*).

    The application shall be submitted to the Permitting Authority with a copy to PCAQD. [Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

A. EU No. 001 Formulation of Resin Based Product

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	This emissions unit consists of the mixing of resin and related components for use mainly by the fiberglass boat building industry. The main production building consists of: 1. Raw materials storage area, 2. Five (5) partially enclosed mixing tanks of various sizes ranging from 1,000 to 3,500 gallons, 3. Promoters' storage area, 4. Laboratory, 5. Final products storage area and 6. Polyester resin storage area. The production building is equipped with several wall vents and/or fans that are utilized to capture and vent objectionable odors. In addition, the building is equipped with two (2) overhead rollup doors that may be closed, as necessary, to help control objectionable odors. All transfer and mixing of resins and related components occur within the main production building. Emissions of unconfined particulate matter from such activities vent inside the building. In addition, there are two (2) 6,000 gallon styrene polyester resin storage tanks and one (1) 6,000 gallon styrene monomer storage tank outside the building.

RECORDS AND REPORTS

A.1. VOC and HAPs Recordkeeping: The permittee shall maintain a monthly log tracking the usage and associated emissions of HAPs and VOC containing materials used in the manufacturing process. At a minimum, the logs shall contain the following:

a. Facility Name, Facility Number (1030501), Emission Unit ID No. (001) Formulation of Resin Based Product, Month, Year.

b. For each type of raw material (resin, coating, solvent, chemical, etc.) used at the facility that contains HAPs and/or VOC, record the following:
   1. The type of raw material (e.g., resin) and material identification or description;
   2. The quantity (in pounds or tons) of materials used (where usage may be determined based upon the beginning and ending inventory and receipt of materials);
   3. The HAP and VOC content.

c. Emissions:
   1. The total quantity (in tons) of each individual HAP and total HAPs emissions for the month;
   2. The total quantity (in tons) of VOC emissions for the month;
   3. The total quantity (in tons) of each individual HAP and total HAPs emissions for the most recent consecutive 12 month period;
   4. The total quantity of (in tons) of VOC emissions for the most recent consecutive 12 month period.

[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

A.2. Emission Methodology**: T**he permittee shall calculate emissions from the emission unit based on the following methodology:

a. Material Usage Rate ***x*** Species Concentration ***x*** .02% **=** Species Emission Rate for all VOC and non-styrene HAP containing materials.

b. Material Usage Rate ***x*** Species Concentration ***x*** 1.56% **=** Species Emission Rate for <u>all styrene containing materials.</u>

[Rules 62-4.070(3) and 62-210.200, F.A.C. ("Potential to Emit")]

B. EU No. 002 Spray Booth

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
002	Binks Sames spray booth Series 2100 Model No. PBAF-5-T-LH. The booth will be located in the southeast corner of the main production building and will be used for surface coating activities associated with assessing product quality. Resin-based product will be applied to plywood within the spray booth. The activities associated with the surface coating of the plywood are only intended to detect and correct defects in the resin based product so that it may be compared to company-specific performance criteria. The sprayed products are styrene based resin-type and primer-type material primarily used by boat manufacturers.

NOTIFICATION REQUIREMENTS

B.1. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 002, 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)]

RECORDS AND REPORTS

B.2. VOC and HAPs Recordkeeping: To document compliance Specific Condition No. C.3., the permittee shall maintain a monthly log tracking the usage and associated emissions of HAPs and VOC containing materials used in the spray booth. At a minimum, the logs shall contain the following:

a. Facility Name, Facility Number (1030501), Emission Unit ID No. 002 Spray Booth, Month, Year.

b. For each type of material (resin, coating, solvent, chemical, etc.) used in the spray booth that contains HAPs and/or VOC, record the following:

1. The type of material (e.g., resin) and material identification or description;
2. The quantity (in pounds) of materials used;
3. The HAP and VOC content;
4. The "method of application" where applicable and the emission factor (*see Specific Condition No. B.3.*).

c. Emissions:

5. The total quantity (in tons) of each individual HAP and total HAPs emissions for the month;
6. The total quantity (in tons) of VOC emissions for the month;
7. The total quantity (in tons) of each individual HAP and total HAPs emissions for the most recent consecutive 12 month period;
8. The total quantity of (in tons) of VOC emissions for the most recent consecutive 12 month period.

[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

B.3. Emissions Calculation Methodology: Emissions of styrene, MMA and volatile organic compounds (VOCs) shall be determined as follows until notified by the Department or the Pinellas County Air Quality Division.

a. Styrene emissions shall be determined using the following equation:

$$\textbf{Emissions (tons)} = \frac{\textbf{Ms x EF}}{\textbf{2000 lb/ton}}$$

where:

Ms = amount of styrene containing material used (in tons)
EF = emission factor (lb/ton) for styrene monomer content, using the attached UEF table.

b. Methyl Methacrylate (MMA) emissions shall be determined by the following equation for each material.

Emissions (tons) = Mmma x Cmma x 0.75

where:

Mmma = amount of MMA containing material used (in tons)
Cmma = MMA content (percent/100)

c. VOC (including HAPs other than styrene and MMA) emissions shall be determined by the following equation for each material. These values shall be used in conjunction with the above Styrene and MMA emissions to determine total VOC.

Emissions (tons) = Mvoc x Cvoc x 1.00

where:

Mvoc = amount of VOC containing material used (in tons)
Cvoc = VOC content (percent/100)

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

C. EU Nos. 001 and 002 Common Conditions

This section of the permit addresses both EU No. 001 and EU No. 002.

PERFORMANCE RESTRICTIONS

C.1. Hours of Operation: The hours of operation are not limited (8760 hours per year). [Rules 62-210.200(PTE), F.A.C.; Construction Permit 1030501-001-AC]

C.2. Organic Solvents and Volatile Organic Compounds: The permittee shall not store, pump, handle, process, load, unload, or use in any process or installation, OS, or VOC without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be used to minimize pollutant emissions.

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

b. All VOC/HAPs fittings, valve lines, etc. shall be properly maintained.

c. All VOC/HAPs spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

d. All solvent from solvent washings (equipment clean-up) shall be directed into containers that prevent evaporation to the atmosphere.

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

EMISSIONS STANDARDS

C.3. Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emission Limitations: Emissions of VOC, Total HAPs and any individual HAP, from EU Nos. 001 and 002 combined, shall not exceed the following:

Pollutant	Emission Limitation*
VOC	99.0 tons per any consecutive 12 month period
Any Individual HAP	9.0 tons per any consecutive 12 month period
Total HAPs	24.0 tons per any consecutive 12 month period

**Based on these emission limitations additional emission units/activities at the facility may not be eligible to utilize the Categorical Exemptions in Rule 62-201.300(3)(a), F.A.C. or the Generic and Temporary Exemptions in Rule 62-210.300(3)(b), F.A.C.*

[Rule 62-210.200 F.A.C. ("Potential to Emit"); Requested by applicant in permit application dated February 17, 2012]

RECORDS AND REPORTS

C.4. VOC and HAPs Recordkeeping: To document compliance with Specific Condition No. C.2., the permittee shall maintain a monthly log. At a minimum, the logs shall contain the following:

a. Facility Name, Facility Number (1030501), Month, and Year.

b. The total quantity (in tons per month) of each individual HAP and total HAPs emissions from EU Nos. 001 and 002;

c. The total quantity (in tons per month) of VOC emissions from EU Nos. 001 and 002;

d. The total quantity (in tons per year) of each individual HAP and total HAPs emissions for the most recent consecutive 12 month period from EU Nos. 001 and 002;

e. The total quantity of (in tons per year) of VOC emissions for the most recent consecutive 12 month period from EU Nos. 001 and 002.

[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

C.5. Documentation - Supporting documentation (e.g., MSD sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for the records required by Specific Condition Nos. A.1., B.2. and C.4., which includes 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.
[Construction Permit 1030501-001-AC]

C.6. Daily Records - If any month results in total VOC, total HAPs, and/or any individual HAP emissions exceeding 90% of the permitted limits (i.e., 89.1 tons of total of VOC, 21.6 tons of total HAPs, and 8.1 tons of individual HAPs) for the most recent consecutive 12-month period, the facility shall keep daily records beginning on the next operational day following when the monthly calculation was completed. These daily records shall be added daily to demonstrate cumulative 12-month emission totals are in compliance with the emission limitations of Specific Condition No. C.3.

Once a month of daily records is completed, the facility shall make a determination to continue daily recordkeeping. If emission totals exceed 90% of any emission limit listed in this permit, then daily record keeping shall continue. If all the emission totals do not exceed 90% of the permitted values, then the facility may return to monthly recordkeeping. The option of using purchases as a proxy for usage (see Specific Condition No. A.1.) is not allowed for this daily recordkeeping.
[Construction Permit 1030501-001-AC]

C.7. Records Completion and Retention - Daily records (if required) shall be completed within three (3) business days. Monthly records shall be completed by the end of the following month. The records shall be recorded in a permanent form suitable for inspection by the Department and PCAQD upon request, and shall be retained at the facility for a minimum of the most recent three (3) year period.
[Rules 62-4.070(3) and 62-4.160, F.A.C.]