FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Marine Industrial Paint Company, Inc.
4590 60th Avenue North
St. Petersburg, FL 33714

Authorized Representative:
Mr. Gregory Deininger, President

Air Permit No. 1030502-004-AO
Permit Expires: 01/02/2019
Minor Air Operation Permit
Operation Permit Renewal

This is the final permit to renew Air Operation Permit No. 1030502-003-AO for a paint manufacturing and blending operation facility (Standard Industrial Classification No. 2851). The facility is located in Pinellas County at 4590 60th Avenue North in St. Petersburg, Florida. The UTM coordinates are Zone 17, 333.1 km East, and 3079.1 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 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

_____ 01/02/2014
for Kelley M. Boatwright 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 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.

Mr. Gregory Deininger, President
(gregd@tuf-top.com)

Mr. Steve Cook
(stevec@tuf-top.com)

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

Mr. 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.

_____ 1/2/2014
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The paint manufacturing and blending facility produces both water-based and solvent-based paints. The existing facility consists of the following emissions unit (EU).

Facility ID No. 1030502

EU ID No.	Emissions Unit Description
001	Paint Manufacturing and Blending Operations

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 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs). The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1030502-003-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 Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air 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. Equipment and components of Emission Unit No. 001 may be replaced if the actions do not trigger a construction or modification. A construction permit will be required if there is a physical or operation change that causes actual emissions of VOC or HAP to increase, or if there are changes that would be considered a new emission unit. Within 30 days of adding or deleting equipment to or from

Emission Unit No. 001, a new equipment list shall be submitted in writing to the Air Compliance section of the Department's Southwest District and the Pinellas County Air Quality Division. The notice shall include the date that each piece of equipment was added and/or deleted.
[Rules 62-210.200 - Definition of "Modification", 62-210.300(1)(a), F.A.C. and Construction Permit 1030502-001-AC]

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 local program name (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.;

c. copies of the most recent month of records/logs specified in Specific Condition No A.7.

[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 Manufacturing and Blending Operations

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

EU ID No.	Emissions Unit Description
001	Paint Manufacturing and Blending Operations – This emission unit includes a paint manufacturing and blending operation which includes the production of both water and solvent-based paints. The water-based paints are composed of acrylic or alkyd resins and some solvents containing multiple components. Some of the solvents to be incorporated into the paints are received and stored in designated tanks in the storage area. The remaining solvents are received in 55-gallon drums, totes and pails. Solvents and non-volatile paint resins are pumped from the storage tanks, totes, or drums into one of the six cylindrical open top mixing tanks. Each mixing tank includes a mixer powered by an electric motor and typically operates at a volume between 350 and 600 gallons. Powdered pigment and colorants are added and the mixture is agitated. The finished paints are loaded into pails and covered prior to discharging and shipping. The evaporation of VOC components contained in the solvents to be incorporated into the paints and in the cleanup chemicals are a source of potential emissions. Powdered paint pigments and colorants added during the paint blending process are sources of fugitive particulate emissions; however they are emitted inside and remain within the building. To minimize VOC emissions, tank covers are utilized and required to be in place on all tanks at all times during the mixing operations to eliminate fugitive emissions. VOC and HAP emissions are uncontrolled.

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C. and Construction Permit 1030502-001-AC]

EMISSIONS STANDARDS

A.2. Emission Limits – In order to establish the facility as a non-Title V minor source of VOC and HAP emissions, the following emission limits shall not be exceeded:

Pollutant	Annual Emissions (Tons Per Any Consecutive 12-Month Period
Total Volatile Organic Compounds (VOC)	24.0
Individual Hazardous Air Pollutants (HAP)	9.5
Total Hazardous Air Pollutants (HAP)	24.0

[Rule 62-210.200 (definition of Potential to Emit), F.A.C. and Construction Permit 1030502-001-AC]

A.3. Fugitive 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 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. When they are not in use and where possible, tightly cover all open troughs, basins, baths, tanks, etc. which contain VOCs and/or OS's.

d. Prevent excessive air turbulence across exposed VOC's and/or OS's.

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

[Rule 62-296.320(1), F.A.C. and Construction Permit 1030502-001-AC]

A.4. Equipment Identification- All tanks and mixers shall be labeled for identification purposes.
[Rule 62-4.070(3), F.A.C. and Construction Permit 1030502-001-AO]

A.5. General Pollutant Emission Limiting Standard: 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.
[Rules 62-210.200 (Definition of "Objectionable Odor"), 62-296.320(2), F.A.C. and Pinellas County Code, Section 58-178].

A.6. General Pollutant Emission Limiting Standard: 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 shall include, but are not being limited to, the handling of pigments and specific additives in a manner such that fugitive emissions of particulate matter are kept to a minimum.
[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1030502-001-AC].

RECORDKEEPING AND REPORTING REQUIREMENTS

A.7. Recordkeeping – To document continuing compliance with the limits of Specific Condition A.2., the permittee shall maintain, at a minimum, the following records:

a. Monthly Records:

1. Facility Name, Facility Number (1030502), Emission Unit Number (001), Month and Year.
2. The amount of each VOC and/or HAP containing material (by identification number) used in gallons and/or pounds (all records shall be in the same units).

3. The VOC and/or HAP content (percent by weight if usage recorded in pounds or lbs/gallon if usage recorded in gallons) of coatings and solvents used.
4. Calculate the total quantity of VOC, individual HAP and total HAP emissions for the month (in tons) for each raw material. VOC emission and HAP emission (which are also VOC) shall be calculated based on the amount of material processed and the following emission factor unless otherwise directed by the Department:

Emission Factor = 30 pounds of emissions per ton of VOC/HAP processed

5. Calculate the total quantity of VOC, individual HAP and total HAP emissions for the most recent consecutive 12-month period (in tons).

b. Daily Records: If the total VOC, individual HAP or total HAP emission s for the most recent consecutive 12 month period exceeds 80% of the limit specified in Specific Condition No. A.2. (e.g. 7.60 tons individual HAP), the permittee shall implement daily recordkeeping. The daily records shall be kept as described in Specific Condition A.10.A. above and shall be added to the previous 11 monthly totals to demonstrate the facility is remaining below the permitted threshold. Daily recordkeeping shall remain in effect until the VOC and/or HAP emissions are less than 80% of the limit for the most recent consecutive 12 month period.

Supporting documentation (e.g., MSDS sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) which shall include sufficient information to determine VOC, 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.

[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90/94, and Construction Permit 1030502-001-AC]

A.8. Records Retention – Daily Records (if required) shall be completed within five (5) calendar days. Monthly records shall be completed within 10 days of the end of the month. All records required by this permit shall be maintained at the facility for at least three years, unless otherwise noted, and be made available to the Department and Pinellas County Air Quality Division for inspection upon request. [Rule 62-4.070(3) and 62-4.160(14)(b) F.A.C. and Construction Permit 1030502-001-AC