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

RICK SCOTT
GOVERNOR

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SECRETARY

FINAL PERMITS

PERMITTEE

Pierce Manufacturing, Inc.
P.O. Box 2017
Appleton, WI 54912-2017

Authorized Representative:
Shari Klika, Fire & Emergency Segment Environmental Manager

Air Permit Nos. 1030556-001-AC
1030556-002-AO
Permits Expire: 12/31/2013 (AC)
12/31/2018 (AO)
Site Name: Frontline Communications
Minor Air Construction and Operation Permits
Trailer and Custom Modular Body Manufacturer

These are the final air construction and operation permits, in one document. Construction Permit No. 1030556-001-AC authorizes the after-the-fact construction of a trailer and custom modular body manufacturer. Operation Permit No. 1030556-002-AO authorizes the continued operation of the facility. The proposed work is conducted at Frontline Communications (Standard Industrial Classification No. 3715). The facility is located in Pinellas County at 12770 44th St. North in Clearwater, Florida. The UTM coordinates are Zone 17, 333.21 km East, and 3085.96 km North. As noted in the Final Determination provided with these final permits, no changes or only minor changes and clarifications were made to the draft permits.

This final document 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, this document contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this document.

These air pollution permits are 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 these permits. 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 these final permits, 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

_____ _____

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 Determination, the Final Permits 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 to the persons listed below.

Shari Klika, Fire & Emergency Segment Environmental Manager, Pierce Manufacturing, Inc.
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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

These are after-the-fact construction and initial operation permits for Frontline Communications. This facility manufactures trailers and custom modular bodies, and does vehicle conversions for broadcast, communications, command and control, training simulation, and specialty vehicle industries. There are some incidental particulate emissions from paint spray booths, which are captured by filters in the booth exhausts, and from sanding and grinding conducted inside the building, outside of the paint booths. The existing facility consists of the following emissions unit (EU).

Facility ID No. 1030556	
EU ID No.	**Emissions 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 Sources/Activities

- 4.125 MMBtu air heater in Paint Spray Booth No. 1 in accordance with the provisions of Rule 62-210.200(3)(a)33., F.A.C., (Categorical and Conditional Exemptions - Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity equal to or less than 10 million Btu per hour).
- 3.125 MMBtu air heater in Paint Spray Booth No. 2 in accordance with the provisions of Rule 62-210.200(3)(a)33., F.A.C., (Categorical and Conditional Exemptions - Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity equal to or less than 10 million Btu per hour).
- Sanding and grinding operations conducted inside the building in accordance with the provisions of Rule 62-210.300(3)(b)., F.A.C., (Generic and Temporary Exemptions).

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

(Federal NESHAP Applicability Note - As identified in the permit application submitted on September 18, 2013, the facility is subject to 40 CFR 63 Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Subpart HHHHHH is applicable to facility's trailer and custom modular body manufacturing (Emissions Unit No. 001).

As of the effective date of this permit, this NESHAP subpart has not been adopted by the Florida Department of Environmental Protection and therefore is not integrated into this permit.)

PERMIT HISTORY/AFFECTED PERMITS

No previous air permits have been issued for this facility.

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 Resource Management Section. 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.
[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 the 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 Nos. A.9., A.10. and A.11.

[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 Surface Coating Operations

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

EU ID No.	Emissions Unit Description
001	Surface Coating Operations: Booth No. 1 – 20' x 60' Paint Spray Booth with two 42" Axial fans and a 4.125 Mm Btu air heater. Booth No. 2 - 12' x 36' Paint Spray Booth with two 34" axial fans and a 3.125 MM Btu air heater. Each booth has intake filters in the roof and exhaust filters in the floor. The exhaust filters are appropriate for the application and equipment used. The current area of the floor filters in Booth No. 1 is 3' X 51', and the area of the floor filters in Booth No. 2 is 3' x 25'. Manometers monitor the pressure drop across each booth, and the pressure drop is checked for each booth on days when the booth is operated. The filters are also checked visually on days when the booth is operated. When the pressure drop in a booth exceeds the manufacturer's recommended pressure drop range, or when visual evaluation indicates replacement is needed, all the floor filters in that booth are replaced. This normally occurs every one to three months, depending on the quantity of painting operations. Surface coating operations are subject to Rule 62-296.513, F.A.C., Surface Coating of Miscellaneous Metal Parts and Products (VOC RACT).

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.]

A.2. Paint Spray Booth Overspray Filters - The permittee shall not circumvent the paint spray booth air pollution control equipment (fiber filters on the ventilation systems) or allow the emission of air pollutants without this equipment operating properly (*see Specific Condition No. A.8.*). In order to provide reasonable assurance the filters 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 No. 1030556-001-AC]

EMISSIONS STANDARDS

A.3. VOC and HAP Emission Limitations – Emissions from surface coating operations shall not exceed the following:

Pollutant(s)	**Emission Limitations** (maximum tons/consecutive 12 month period)
Total Volatile Organic Compounds (VOC)	15.0
Total Hazardous Air Pollutants (HAPs)	5.0

[Rule 62-210.200 (Definition of Potential to Permit), F.A.C., Construction Permit No. 1030556-001-AC]

(Title V Applicability Note: Since Total HAP emissions are limited to 5 tons per year, individual HAP emissions will never exceed the Title V threshold of 10 tons per year.)

A.4. VOC Reasonably Available Control Technology (RACT) Emission Limiting Standards -

a. No owner or operator of a coating line for miscellaneous metal parts and products shall cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of:

1. 4.3 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies clear coatings;
2. 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;
3. 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings; or,
4. 3.0 pounds per gallon of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

b. If more than one emission limitation in Specific Condition A.4.a., applies to a specific coating, then the least stringent emission limitation shall be applied.

c. All volatile organic compound emissions from solvent washings shall be considered in the emission limitations in Specific Condition A.4.a., unless the solvent is directed into containers that prevent evaporation into the atmosphere.

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

A.5. 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. Objectionable odor shall be verifiable off the property.
[Rules 62-4.070(3), 62-210.200("Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas County Code, §58-178]

A.6. Fugitive Volatile Organic Compound (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.

[Rule 62-296.320(1), FAC; Construction Permit No. 1030556-001-AC]

A.7. Unconfined Particulate Matter (PM) - 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 following:

a. Each of the two paint spray booths contain filters to capture PM emissions from overspray.

b. Each of the paint spray booths includes a device to measure pressure drop across the filter.

c. Filters are changed per manufacturer's recommendation.

d. Good housekeeping practices are adhered to at all times.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit No. 1030556-001-AC]

MONITORING REQUIREMENTS

A.8. Paint Spray Booth Filters - To demonstrate compliance with Specific Condition No.A.2., the permittee shall inspect the filter elements at the start of operations each day a booth is used. Filters shall be changed routinely when visual inspection reveals a damaged or clogged filter. *(See Specific Condition No. A.11., for associated recordkeeping requirements.)*
[Rules 62-4.070(3), 62-210.650 ("Circumvention"), and 62-296.320(4)(c)2., F.A.C.; Construction Permit No. 1030556-001-AC]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.9. Daily RACT Records for Metal Surface Coating Operations - In order to document compliance with the VOC emission limitations of Specific Condition No. A.4., 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., 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 multi-component 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; and

h. the temperature in the spray booths if it is above 194° F.

(Permitting Note- Purchase records may not be used as a proxy for usage in determining RACT compliance.)

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

A.10. VOC and HAP Monthly Records - In order to document compliance with the VOC and HAP emissions limitations of Specific Condition No. A.3., 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., Surface Coating Operations);

b. month, year, and method used for records (usage or purchase);

VOC Monthly Records

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

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

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

HAP Monthly Records

f. the quantity and HAP content 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. cumulative total of the HAP emissions for total HAPs for the most recent consecutive 12-month period, in tons.

(Permitting Note- The preferred units of measure for VOC and HAP recordkeeping are gallons and pounds per gallon; however, other units may be used if a conversion factor is provided, and the units are relative to each other.)

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

A. EU No. 001 Surface Coating Operations

A.11. Paint Spray Booth Maintenance Recordkeeping - In order to document compliance with Specific Condition No. A.8, the permittee shall keep the following paint spray booth filter maintenance records for each booth:

a. date and time of each filter inspection;

b. identification of booth and person creating record;

c. pressure drop reading;

d. statement of condition of filter; and

e. notation if filter was changed.

[Rules 62-4.070(3) and 62-210.650 F.A.C.; Construction Permit No. 1030556-001-AC]

A.12. Documentation - Supporting documentation (MSDS sheets, purchase orders, EPA "As Supplied" data sheets, etc.) shall be kept for all chemicals stored at the facility, which includes sufficient information to determine emissions and compliance. Where credit is taken for recycled materials, documentation of reclaimed chemicals, such as during clean-up operations that use solvents, will use a mass balance method to determine usage (amount used for clean-up minus amount collected for disposal or recycle). These records shall be maintained at the facility and be made available to the Department and the Pinellas County Air Quality Division (PCAQD) for inspection upon request.
[Rule 62-4.070(3), F.A.C.]

A.13. Records Retention – The daily records required by Specific Condition No.A.9., shall be completed by the end of the next business day. The monthly records required by Specific Condition No. A.10., shall be completed by the end of the following month. Records required by Specific Condition No. A.11., shall be completed on the day of the filter inspection. These records shall be retained on file at the facility for at least three (3) years and shall be made available to the Department and the Pinellas County Air Quality Division (PCAQD) upon request.
[Rule 62-4.070(3), F.A.C.]