

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION



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APPLICANT

General Engines Company, Inc.
14893 Highway 27
Lake Wales, Florida 33859

Eager Beaver Trailers – Lake Wales

Facility ID No. 1050432

PROJECT

Project No. 1050432-004-AC
Application for Minor Air Construction Permit
Increase Sand Throughput Rate

COUNTY

Polk County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

December 3, 2012

Prepared by Tammy McWade

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GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Chapters 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations in Rule 62-204.800, F.A.C.

I. Facility Description

Eager Beaver Trailers is an existing manufacturer for Truck Trailers, which is categorized under Standard Industrial Classification Code No. 3715. The existing Eager Beaver Trailers is located in Polk County at 14893 Highway 27 in Lake Wales, Florida. The UTM coordinates are Zone 17, 442.3 kilometers (km) East and 3079.2 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to Ambient Air Quality Standards (AAQS).

This facility manufactures construction equipment trailers. The permitted sources at this facility include surface coating (EU 001), sandblasting (EU 002), and various reciprocating internal combustion engines (RICE) (EU 003 – EU 006). Material balance and recordkeeping are used to control volatile organic compounds (VOC) and Hazardous Air Pollutants (HAP) emissions for the surface coating operation. The booths used for surface coating and sand blasting are completely enclosed and equipped with filter panels to control the emission of particulate matter (PM).

II. Project Description

On November 1, 2012, Eager Beaver Trailers submitted a complete application requesting authorization to increase the throughput rate of the sand for the sandblasting operation from 373 tons per year (TPY) to 1,000 TPY. The increase in the sand may result in a slight increase in the particulate matter (PM) emission rate. However, the sand blasting operation is completely enclosed and is equipped with a fabric filter controlling the emissions of PM.

A. Applicant:

Francis Flowers, Jr., President
General Engines Company, Inc.
14893 Highway 27
Lake Wales, Florida 33859

B. Professional Engineer:

Dean H. Myers, P.E.
General Environmental Engineering, Inc.
1717 John Arthur Way
Lakeland, Florida 33803

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C. Project Location:

Eager Beaver Trailers
 14893 Highway 27
 Lake Wales, Florida 33859

D. Project Summary:

This permit will revise Permit No. 1050432-001-AC for sandblasting contained in two sandblasting booths (EU 002). The previously issued Permit No. 1050432-001-AC authorized the applicant to operate a surface coating and sandblasting operation. The sandblasting operation was limited to a throughput of 373 TPY of sand. The applicant is requesting an increase in the throughput of sand to 1,000 TPY. The sand blasting operation is completely enclosed and is equipped with a fabric filter controlling the emissions of PM.

E. Application Information:

Complete Application Received on: 11/01/2012

III. Applicable State and Federal Regulations

This project is subject to the preconstruction review requirements of Chapter 403, F.S. and Chapters 62-204 through 62-297, F.A.C., as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration (PSD) or Nonattainment Requirements, F.A.C.	Y	not exempt from general permitting requirements
Rule 62-212.400, F.A.C. - PSD	N	the facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	N	the sandblasting operation is confined
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	N	there is no applicable source category
Rule 62-296.401 - 418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Polk County is an attainment area for ozone
Rule 62-296.700, F.A.C. - RACT - PM	N	this is a new source, therefore not subject to PM RACT rule
Rule 62-204.800, F.A.C. - NSPS	N	there is no applicable source category
Rule 62-204.800, F.A.C. - NESHAPS – 40 CFR 61	N	there is no applicable source category
Rule 62-204.800, F.A.C. - NESHAP for Source Categories –MACT (40 CFR 63)	N	there is no applicable source category
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	facility is a Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements	N	no emissions testing is required

Notes:

- Reasonably Available Control Technology (RACT)
- Maximum Available Control Technology (MACT)

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IV. Summary of Emissions

Pollutant	EU No. and brief description	Existing Potential Emissions (TPY)	Increase in Potential Emissions (TPY)	Potential Emissions after Project (TPY)
<i>Project Potential Emissions</i>				
PM/PM₁₀	002 – Sandblasting Operation	0.3	1.52	1.83
	VeriForm plasma cutting table (<i>exempt</i>)	1.3	---	
	Total	1.6	1.52	2.12
<i>Existing Facility Emissions</i>				
VOC	001 – Surface Coating Operation	33	---	33
	Total	33	---	33
Total HAP	001 – Surface Coating Operation	24	---	24
	Total	24	---	24
Individual HAP	001 – Surface Coating Operation	9.9	---	9.9
	Total	9.9	---	9.9
VE	002	5% Opacity	---	5% Opacity

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, F.S. and Section 62-4.070, F.A.C., the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).