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

RSR Industrial Coatings, Inc.
7621 Poinsettia Avenue
Bartow, FL 33830

Authorized Representative:
Mr. Richard Toney, Vice President/Owner

Air Permit No. 1050441-001-AF
Permit Expires: xx/xx/2017
Site Name: Alturas Facility
Federally Enforceable State Operating Permit (FESOP)
Project Name: Initial Operation Permit

This is the final air operation permit for an existing abrasive blasting facility. The proposed work is conducted at the Alturas Facility (Standard Industrial Classification No. 1721). The facility is located in Polk County at 7621 Poinsettia Avenue in Bartow, Florida. The UTM coordinates are Zone 17, 429.6 km East, and 3082.9 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.

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.

Mr. Richard Toney, RSR Industrial Coatings (rick@rsrcoatings.com)

Ms. Sonya Toney, RSR Industrial Coatings (sonya@rsrcoatings.com)

Mr. Dean Myers, P.E., General Environmental Engineering (deanhmyers@earthlink.net)

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

Existing Facility

This facility applies protective coatings to metal pipes and other equipment used in various industries. It is regulated for its abrasive blasting operation. The facility has been in operation since 2006, but the blast material throughputs did not approach permitting threshold until late 2011. Facility's surface coating operation has been determined to be exempt from permitting due to low material usage.

This project will create the following emissions unit.

Facility ID No. 1050441	
ID No.	Emission Unit Description
001	Abrasive Blasting Operation

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

Exempt Emission Units/Activities

- Sand silo, exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C.
- Surface coating operation, exempt from permitting pursuant to Rule 62-210.300(3)(a)27, F.A.C.
- Powder coating operation, exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C.
- One 1.6 MMBtu/hr natural gas fired curing oven, exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C.

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 particulate matter (PM).

{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 it uses coatings containing the target HAPs of chromium (Cr), nickel (Ni), cadmium (Cd), lead (Pb), or manganese (Mn), or uses methylene chloride (MeCl) as a chemical stripper. Should the permittee become subject to this subpart, it shall comply with all its applicable provisions.}

PERMIT HISTORY/AFFECTED PERMITS

This is the initial air operation permit for this existing facility.

ADMINISTRATIVE REQUIREMENTS

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 Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

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 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 No. A.3.

    [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.]

FACILITY-WIDE SPECIFIC CONDITIONS

9. Unconfined Emissions of Particulate Matter: In addition to Condition 9. of Appendix C. (*Common Conditions*), the following reasonable precautions shall be followed:
    a. Abrasive blasting shall be conducted in such a manner as to avoid causing material to cross property lines.
    b. All abrasive blasting shall be conducted in the designated blast area under roof.
    c. Abrasive blasting shall cease if wind conditions or other circumstances result in fugitive dust causing a significant public nuisance problem outside the plant property.
    d. As an indicator that the reasonable precautions are adequate, visible emissions (VE) at the property line should not exceed 10%. If this value is exceeded, it shall not be considered a violation in and of itself, but may be a violation of the reasonable precautions required to be taken and/or may require additional precautions to be taken.
    e. If necessary, the speed of the vehicular traffic on the unpaved road shall be reduced to a level minimizing the production of dust.
    f. If necessary, further vehicular traffic dust control requirements may include the periodic application of non-potable water.

    [Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

    {Permitting Note: Proposed by applicant in the permit application received on 01/31/12.}

B. EU No. 001 – Abrasive Blasting Operation

This section of the permit addresses the following emissions unit.

ID No.	Emissions Unit Description
001	Blasting operation is conducted in the designated blast area under roof. Blast materials utilized at this facility are silica sand and Black Beauty. Silica sand is delivered by trucks and stored in a silo. Black Beauty is delivered in bags. Both silica sand and Black Beauty are fed to pressurized blast pots, from which the material is delivered to the blast nozzle. Emissions from this operation are uncontrolled. Compressor for the blasting operation is powered by electricity.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The blast material throughput is limited to 450 tons per any consecutive 12-month period.
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
{Permitting Note: The limit was requested in the permit application received on 01/31/12.}

A.2. Hours of Operation: The hours of operation are not limited (i.e., 8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

RECORDS AND REPORTS

A.3. Monthly Log: The permittee shall keep monthly logs to document compliance with the throughput limitation of Specific Condition A.1. At the option of the permittee, "purchases" may be used instead of "usage" in determining blast material throughput, provided that no material is used which is not purchased. The logs shall include the following for each calendar month:

a. Facility name, facility ID No., emissions unit ID No., and description (i.e., RSR Industrial Coatings, 1050441, EU 001, Abrasive Blasting Operation).

b. The monthly amount of blast material used, in tons.

c. A cumulative total amount of blast material used for the most recent consecutive 12-month period, in tons.

Monthly records shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.]