TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

RSR Industrial Coatings, Inc.
P.O. Box 1035
Lithia, FL 33547

Alturas Facility

Facility ID No. 1050441

PROJECT

Project No. 1050441-001-AF
Application for Federally Enforceable State Operating Permit
Project Name: Initial Operation Permit

COUNTY

Polk County, Florida

PERMITTING AUTHORITY

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

March 15, 2012

Prepared by Nedin Bahtic

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 Rules 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 on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Mr. Richard Toney, Vice President/Owner
RSR Industrial Coatings, Inc.
P.O. Box 1035
Lithia, FL 33547

B. Professional Engineer:

Mr. Dean Myers
General Environmental Engineering Inc.
1717 John Arthur Way
Lakeland, FL 33803

C. Project Location:

7621 Poinsettia Avenue
Bartow, FL 33830

Figure 1. Aerial view of the facility.

Figure 2. Facility location (street map view).

D. Project Summary:

For the initial operation permit for an existing abrasive blasting facility. RSR Industrial Coatings, Inc. has been in operation since 2006, but the blast material throughputs did not approach permitting threshold until late 2011. With this permit, facility's abrasive blasting operation will be limited to an annual throughput of 450 tons of blast material. The facility also conducts surface coating operations, but this activity has been determined to be exempt from permitting due to low material usage.

Figure 3. Abrasive blasting area.

E. Application Information:

Application Received on: 01/31/2012
Additional Information Requested on: N/A
Additional Information Received on: N/A
Application Complete: 02/07/2012

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	abrasive blasting operation (EU No. 001) is a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	surface coating operation (*exempt activity*) is a source of VOC and odors
Rule 62-296.401-470, 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 not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	this is a new source, therefore not subject to PM RACT rule
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	there is no applicable source category
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	no emissions testing is required

III. Summary of Emissions

Pollutant	Regulated EU No. and brief description	Potential Emissions (tons/year)	Allowable Emissions
PM/PM_{10}	001 – Abrasive Blasting Operation	18.45*	N/A
	Total	18.45	

* (450 tons/year blast material) x (0.041 tons PM/ton blast material) = 18.45 tons/year PM; emission factor of 0.041 tons of PM emissions per ton of blast material is from STAPPA/ALAPCO Air Quality Permits: A Handbook for Regulators and Industry, Vol. I (5/91).

IV. 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.

V. 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, Florida Statutes and Section 62-4.070, Florida Administrative Code, 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).