# TECHNICAL EVALUATION
# &
# PRELIMINARY DETERMINATION

## APPLICANT

Ring Power Corporation
500 World Commerce Parkway
St. Augustine, Florida 32092

Facility ID No. 1090449

## PROJECT

Project No. 1090449-003-AO
Application for Minor Source Air Operating Permit
Renewal

## COUNTY

St. Johns County, Florida

## PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
Northeast District Office
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590

January 31, 2011

## 1. 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.

### Facility Description and Location

Ring Power Corporation is an existing Wholesale Trade- Durable goods facility, which is categorized under Standard Industrial Classification Code No. 5082. The facility is located in St. Johns County at 500 World Commerce Parkway in St. Augustine, Florida. The UTM coordinates of the existing facility are Zone 17, 455.99 km East, and 3316.09 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

### Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

### Project Description

Air Operating Permit Renewal

**Processing Schedule**

12/30/2010 Received the application for a minor source air pollution operating permit.
1/26/2011 Application complete.

## 2. APPLICATION REVIEW

**Discussion of Emissions**

**EU001 Visible Emissions**

**State Requirements**

**General Visible Emissions Standard (Facility Wide)**. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions elsewhere in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). If a special compliance test is required, the test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.
[Rule 62-296.320(4)(b)1., F.A.C.]

**Unconfined Particulate Matter.** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility may include but are not limited to:

a. Reduced speed for vehicular traffic.
b. Use of dust suppressants or wetting agents.
c. Use of paving or other asphaltic materials.
d. Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or wetting prior to sweeping.
e. Covering of trucks, trailers, frontend loader and other vehicles or containers to prevent spillage of particulate matter during transport.
f. Use of mulch, hydro seeding, grassing and/or other vegetative ground cover on barren areas to prevent or reduce particulate matter from being windblown.
g. Use of hoods, fans, filters and similar equipment to contain, capture and prevent particulate matter.
h. Enclosure or covering of conveyor systems.
i. Confining abrasive blasting where possible
j. Sprinkling or otherwise wetting or conveyor systems.

[Rule 62-296.320(4)(c)2., F.A.C.]

**Special Compliance Tests**. When the department, after investigation, has good reason to believe that any applicable emission standard contained in a Department rule or in a permit issued to those rules is being violated, it shall require the owner or operator of the emission unit to conduct compliance tests which identify the nature and the quantity of pollutant emissions from the emission s unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7)(b), F.A.C.]

**EU002 VOC**

**Emissions Standards.** The spray booth shall not be operated unless all exhaust air passes through the paint arrestor filter media.

[Rule 62-210.650, F.A.C]

Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA Reference Method 24 (as described in 40 CFR 60, Appendix A) for VOC. Manufacturers data sheets with VOC contents may be substituted.
[Rule 62-297.401(24), F.A.C]

**RECORDS AND REPORTS**

Records shall be maintained daily for the following:

A. Gallons of coating(s) applied
B. VOC content (lbs/gal) of coatings as applied
C. Gallons of solvent / thinner usage as dilution agent
D. VOC content (lbs/gal) of solvent / thinner
E. Gallons of solvent / thinner usage for cleanup
F. Total and individual HAPs,

Records shall be maintained for a minimum of two (2) years and made available to the Department upon request.

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

***Ring Power Corporation may be subject to Area Source MACT 40 CFR Part 63 HHHHHH -National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing, upon adoption by reference into the Florida Administrative Code Rule.***

## 3. 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. Leslie Maybin is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Northeast District Office, Florida Department of Environmental Protection (Department), 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590.