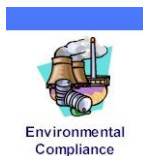




Surface Coating Operations – General Permits

SURFACE COATING OPERATIONS

COMPLIANCE INSPECTION CHECKLIST



INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)
RE-INSPECTION (FUI) ARMS COMPLAINT NO: _____

AIRS ID#: 1030519 **DATE:** 6/14/2011 **ARRIVE:** 10:45AM **DEPART:** 11:40 AM

FACILITY NAME: CELRON, Inc.

FACILITY LOCATION: 12810 49th Street North
Clearwater, FL

RESPONSIBLE OFFICIAL: Ronald Bray **PHONE:** 727-573-7376

CONTACT NAME: Ronald Bray **PHONE:** 813-267-1751

REMITTANCE YEAR: _____ **ENTITLEMENT PERIOD:** / 4/23/2015
(effective date) (end date)

PART I: INSPECTION COMPLIANCE STATUS (check only one box)

IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

PART II: RECORDKEEPING REQUIREMENTS – Rule 62-210.300, F.A.C.

(check appropriate box(es))

- 1. Does the facility operate any emissions units other than the surface coating operations and emissions units which are exempt from permitting pursuant to the criteria of paragraph 62-210.300(3)(a) or (b), F.A.C., or have been exempted from permitting under Rule 62-4.040, F.A.C.? (Rule 62-210.300(3)(c)4.a., F.A.C.) Yes No
- 2. Does the owner/operator of the facility maintain records to document the VOC content of the coatings and the quantity of the coatings used?----- Yes No
- 3. Does the owner/operator retain, and make available for Department inspection, these records for a period of at least five years?----- Yes No
- 4. Is the total quantity of VOC's in such coatings 44 lbs/day or less, averaged monthly?----- Yes No
- 5. Does the amount of coatings used, include solvents and thinners used in the process including those used for cleanups?----- Yes No

PART III: CONTROL/OPERATING/MAINTANANCE REQUIREMENTS – Rule 62-210.300, F.A.C.

(check appropriate box(es))

- 1. Is/Are the surface coating operation(s) subject to a VOC Reasonably Available Control Technology (RACT) emission limiting standard of Chapter 62-296.500, F.A.C.? (Rule 62-210.300(3)(c)4.b., F.A.C.)----- Yes No
- 2. Does the facility cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor? (Rule 62.296.320(2), F.A.C.)----- Yes No

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PART III: CONTROL/OPERATING/MAINTENANCE REQUIREMENTS – Rule 62-210.300, F.A.C. – (continued)

(check appropriate box(es))

3. Does the owner/operator encourage pollution prevention through such measures as training employees involved in surface coating operations on methods of reducing VOC emissions by:
- a) maintaining spray coating equipment to ensure effective application with a minimum of overspray? Yes No
 - b) monitoring the coating thickness to avoid excessive coating?----- Yes No
 - c) considering the use of low-VOC coatings (e.g., waterborne, ultra-violet cured, or powder coatings)? Yes No
 - d) implementing inventory control practices to prevent spillage?----- Yes No
 - e) implementing management practices to reduce VOC emissions during cleanup by:
 - 1. spraying light colored coatings before dark colored coatings to reduce the number of cleaning cycles?----- Yes No
 - 2) recycling cleaning solvents?----- Yes No
 - 3) using water based cleaners?----- Yes No

PART IV: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-210.300, F.A.C.

A. New or Modified Process Equipment

1. Since the last inspection has there been
- a) installation of any new process equipment?----- Yes No
 - b) alterations to existing process equipment without replacement?----- Yes No
 - c) replacement of existing equipment substantially different than that noted on the most recent notification form?----- Yes No
 - d) If you answered **YES** to any of the above, did the owner submit a new and complete notification form and appropriate fee (Rule 62-4.050, F.A.C.) to the appropriate DEP or local program office?----- Yes No

Shea Jackson

Inspector's Name (Please Print)

June 14, 2011

Date of Inspection

Inspector's Signature

2012

Approximate Date of Next Inspection

COMMENTS: See the attached Pinellas County inspection report form for additional information

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| | | | |
|--|--|---|---|
| FACILITY: CELRON, Inc. Maaco Collision Repair and Auto Painting | | Per_ID: 2805 | DISTRICT: Southwest |
| ADDRESS: 12810 49th Street North Clearwater, FL | | CONTACT: Phone No: 813-267-1751 | |
| ARMS No.: 1030519 | PERMIT NO.: 1030519-002-AG | EXPIRATION DATE: 4/23/2015 | |
| EMISSION UNIT DESCRIPTION: Automobile Painting: A Garmat Tier 1 Spray Booth with drying enclosure. A Hercules GW/RT gun washer is used. | | | |
| INSPECTION DATE: June 14, 2011 | ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2 or INS_____ | COMPLIANCE STATUS: <input checked="" type="checkbox"/> IN <input type="checkbox"/> MNC <input type="checkbox"/> SNC | |
| Type of Inspection: <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Re-inspection <input type="checkbox"/> Complaint <input type="checkbox"/> Drive-by <input type="checkbox"/> Quarterly | | | |
| A. General Review: | | | |
| 1. | Permit File Review | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. | Introduction and Entry <i>Comments: I met with the owner, Ron Bray the Maaco Paints representative.</i> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3. | Is the Authorized Representative still: <u>Ronald Bray?</u> <i>Comments: Yes he is still the A.R.</i> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. | Is the facility contact still: Ronald Bray? <i>Comments: Yes, he is new facility contact.</i> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| B. Specific Conditions | | | |
| I | M | S | |
| N | N | N | |
| C | C | C | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | A facility comprising one (1) or more surface coating operations shall be eligible to use this air general permit provided it meets the general eligibility criteria of paragraph 62-210.310(2)(a), F.A.C., and the following specific criteria. a. The facility shall use no other air general permit. b. The facility shall not be subject to any unit-specific applicable requirement. [62-210.310(4)(c)1., F.A.C.] <i>Comments: The facility only applies surface coating operation for automobiles. There is one spray booth, the oven bakes on finish and is typically used at 135^oF for ~ 30 minutes. The facility operates no other emission units.</i> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The total quantity of volatile organic compounds in all coatings used shall not exceed forty-four (44) pounds per day, averaged monthly, where coatings used shall include all solvents and thinners used in the process or for cleanup. [62-210.310(4)(c)2.a., F.A.C.] <i>Comments: Reviewed records for the months of <u>May 2010 – April 2011</u>. The facility daily average was . The average paint weight is 7.9 lbs / gallon. The highest month of paint usage was March with 58.18 gallons during 24 days of operation. 58.18 x 7.9 lbs / gallon, divided by 24 days. The highest reported monthly daily average was <u>19.15 lbs/day</u>. This does not exceed the emissions limitation of 44 lbs/day. Supporting documentation was available (<input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No). Mr. Bray stated that business has been slower this year. They currently paint ~ 4 cars /day using 3 quarts of products/ car would be 12 quarts / day. The records and the Material Safety Data sheet information that are being kept on a computerized system. The VOC per products used at their facility still ranges 3.5 – 6.1 lbs/gallon, Mr. Bray stated the standard paint thickness are 1.1 -.1.3 mil. (See photo and record copies)</i> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The owner or operator shall maintain records to document the VOC content and the quantity of coatings used. The owner or operator shall retain these records, available for Department inspection, for a period of at least five (5) years. [62-210.310(4)(c)2.b., F.A.C.] <i>Comments: The records were available for <u>May 2010 through April 2011</u>. 12 month consecutive totals N/A (not in the rule under 62.210. 310). The 12 month total as of 4/29/2011 for paint usage was 593.37 gallons. The general permit record keeping is to review the highest monthly average of the daily quantity of volatile compounds <input checked="" type="checkbox"/> were <input type="checkbox"/> were not available at this time. A partial copy of the records is attached as an example of the record format.</i> |

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| I N C | M N C | S N C | |
|-------------------------------------|--------------------------|--------------------------|---|
| | | | C. Selected General Conditions and Procedures |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <p>Administrative Corrections. Within thirty (30) days of any minor changes requiring corrections to information contained in the registration form, the owner or operator shall notify the Department in writing. Such changes shall include:</p> <p>1. Any change in the name, address, or phone number of the facility or authorized representative not associated with a change in ownership or with a physical relocation of the facility or any emissions units or operations comprising the facility; or [62-210.310(2)(d), F.A.C.]</p> <p><i>Comments: There were no changes made to the facility operations.</i></p> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <p>Equipment Changes. The owner or operator shall maintain records of all equipment changes. In the case of installation of new process or air pollution control equipment, alteration of existing process or control equipment without replacement, or replacement of existing process or control equipment with equipment substantially different in terms of capacity, method of operation, material processed, or intended use than that noted on the most recent registration form, the owner or operator shall submit a new and complete air general permit registration form for the facility with the appropriate fee pursuant to Rule 62-4.050, F.A.C. to the Department, provided, however, that any change that would constitute a new major stationary source, major modification, or modification that would be a major modification but for the provisions of paragraph 62-212.400(2)(a), F.A.C., shall require authorization by air construction permit. [62-210.310(2)(e), F.A.C.]</p> <p><i>Comments: There have been no changes to the equipment in this facility. The facility has one spray booth and oven to bake finish at typically 135°F. The facility uses HVLP gun system for spray painting. There is a covered gun cleaning system in the paint storage area. Mr. Bray stated they change filters every 2 – 4 weeks depending on booth usage. They clean out the fan in stack monthly. . (see photo)</i></p> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <p>If, for any reason, the owner or operator of any facility operating under an air general permit does not comply with or will be unable to comply with any condition or limitation of the air general permit, the owner or operator shall immediately provide the Department with the following information:</p> <p>1. A description of and cause of noncompliance; and</p> <p>2. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. [62-210.310(3)(i), F.A.C.]</p> <p><i>Comments: There were no non compliance issues to address with the facility at this inspection; the facility has just started training employees and getting set up for business.</i></p> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <p>Valid Permit</p> <p>Use of an air general permit is not transferable and does not follow a change in ownership of the facility. Prior to any sale, other change of ownership, or permanent shutdown of the facility, the owner or operator is encouraged to notify the Department of the pending action. The new owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C. [62-210.310(3)(b), F.A.C.]</p> <p><i>Comments: The permit does not expire until 4/23/2015.</i></p> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <p>Re-registration. Registration of a facility which is currently authorized to operate under the terms and conditions of an air general permit is classified as a re-registration. An owner or operator shall re-register the facility in the following cases:</p> <p>a. Impending expiration of the term for air general permit use;</p> <p>b. Change of ownership of all or part of the facility;</p> <p>c. Proposed new construction, modification, or other equipment change that requires registration pursuant to paragraph 62-210.310(2)(e), F.A.C.; and</p> <p>d. Any other change not considered an administrative correction under paragraph 62-210.310(2)(d), F.A.C. 62-210.310(2)(b)2.</p> <p><i>Comments: There have been no further changes which would require a change to the registration..</i></p> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <p>The owner or operator's use of an air general permit is limited to five (5) years. Prior to the end of the five (5) year term,</p> |

Surface Coating Operations – General Permits

| I N | M N C | S N C | |
|--------|-------------|-------------|---|
| | | | C. Selected General Conditions and Procedures |
| | | | <p>the owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C. To avoid lapse of authority to operate, the owner or operator must submit the proper registration form and processing fee at least thirty (30) days prior to expiration of the facility's existing air general permit. The air general permit re-registration form shall contain all current information regarding the facility. [General Conditions - 62-210.310(3)(a), F.A.C.]</p> <p><i>Comments: The permit expires on 4/23/2015. A new notification form is required to be submitted no later than 3/24/2015.</i></p> |

| D. Other: | |
|---|--|
| Pollution Prevention Activities | |
| <p>➤ P2 Handouts Provided: <input checked="" type="checkbox"/> P2 Brochure; <input checked="" type="checkbox"/> P2 Manual; <input checked="" type="checkbox"/> P2 Checklist “Auto Body Painting, Spray Booth P2R2” and the Surface coating checklist were given to Mr. Bray.</p> <p>➤ Have any emissions reductions occurred <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <u>VOC reduction primer roll on versus spraying on surface</u></p> <p><input type="checkbox"/> Chemical Substitution; <input type="checkbox"/> Equipment Changes; <input type="checkbox"/> Process Changes</p> <p><input checked="" type="checkbox"/> Chemical/Material Reuse; <input type="checkbox"/> On-site Recycling; <input type="checkbox"/> Other: _____</p> <p><i>Comments: The facility still rolls on some of their primer, it saves paint because no loss in overspray. They use fewer materials IE. paper and tape usage is less to prepare cars for coating. The facility recovers their solvents through safety Kleen who returns drum with recycled solvent. The facility uses a computerized paint system to matches the paint on the cars through the VIN number. The paint formula goes to the scale area where the read out instructs the operator with the exact amounts of each ingredient. This system allows for correction, if the operator puts in too much, the scale reformulates so get correct color match, and prevents waste. They recycle metal and plastics also</i></p> | |

| | |
|--|---|
| Closing Conference | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Other Comments: <i>I informed Mr. Bray the facility appears to be in compliance. I will review the records and if there are any deficiencies in the record keeping let him know so he can address to meet permit conditions.</i> | |

| | |
|---|---------------------|
| Inspector(s): Shea Jackson, Pinellas County, Air Quality Division | |
| Signature(s) | Date: June 20, 2011 |

ACCESS? yes, GCPI? yes,

