



# SURFACE COATING OPERATIONS

## COMPLIANCE INSPECTION CHECKLIST



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

**AIRS ID#:** 1030541      **DATE:** 12/14/10      **ARRIVE:** 11:00am      **DEPART:** 12:30pm

**FACILITY NAME:** United Advantage Sign Companies

**FACILITY LOCATION:** 208 Tower Drive  
Oldsmar, FL

**RESPONSIBLE OFFICIAL:** James P. DeLellis      **PHONE:** 813-855-6476

**CONTACT NAME:** Ben Zaccagnino?      **PHONE:** 813-855-6476

**REMITTANCE YEAR:** 2015      **ENTITLEMENT PERIOD:** 10/2/10 / 10/2/2015  
(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))

- 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
- 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
- Does the owner/operator retain, and make available for Department inspection, these records for a period of at least five years?-----  Yes  No
- Is the total quantity of VOC's in such coatings 44 lbs/day or less, averaged monthly?-----  Yes  No
- 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))

- 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
- 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

**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

Shannon Ransom

Inspector's Name (Please Print)

12/14/10

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

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

## Surface Coating Operations – General Permits

<b>FACILITY:</b> United Advantage Sign Companies		<b>Per_ID:</b> 2892	<b>DISTRICT:</b> Southwest
<b>ADDRESS:</b> 208 Tower Drive Oldsmar, FL		<b>CONTACT:</b> Phone No: 813-855-6476	
<b>ARMS No.:</b> 1030541	<b>PERMIT NO.:</b> 1030541-001-AG	<b>EXPIRATION DATE:</b> 10/2/2015	
<b>EMISSION UNIT DESCRIPTION:</b> Commercial Sign Manufacturer. Aluminum 95% and 5% Steel are coated. Two Spray Booths are used. Currently Operating under a policy RACT (62-296.513) exemption of <750 gallons year of coatsins and solvents.			
<b>INSPECTION DATE:</b> 12/14/10	<b>ARMS INSPECTION TYPE:</b> <input checked="" type="checkbox"/> INS2 or INS_____	<b>COMPLIANCE STATUS:</b> <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			
<b>A. General Review:</b>			
1.	Permit File Review	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2.	Introduction and Entry	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Comments:</b> I met with Ken Beaver and Ben Zaccagnino. Ken gave me a tour of the facility and answered my questions.			
3.	Is the Authorized Representative still: <u>James P. DeLellis</u> ?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Comments:</b>			
4.	Is the facility contact still: Ben Zaccagnino?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Comments:</b>			
<b>I N C</b>	<b>M N C</b>	<b>S N C</b>	<b>B. Specific Conditions</b>
<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.]  <b>Comments:</b> The facility uses no other air general permit.
<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.]  <b>Comments:</b> Reviewed records for the months of _____ The highest reported monthly daily average was _____ pounds. Supporting documentation was available ( <input type="checkbox"/> Yes or <input type="checkbox"/> No).  The facility did not have adequate records demonstrating compliance with this requirement. They had invoices showing their purchases for the last month or two, but have not created a record format showing their usage and the voc content. I informed Ken Spires, the paint shop manager, what type of records the facility should be keeping, which should include the product, the amount of product used, the voc content of the product, and the pounds/gallon used on a daily basis averaged monthly. Per Wayne Martin, we will not consider this a violation and will use this as an opportunity to provide compliance assistance given the facility received the permit only two months ago. We will give them time to start keeping proper records and request one month's worth (January) to be turned in to us the first part of February.
<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.]

## Surface Coating Operations – General Permits

I N	M N C	S N C	<b>B. Specific Conditions</b>
			<p><b>Comments:</b> The records were available back to _____N/A_____. 12 month consecutive totals <input type="checkbox"/>were <input checked="" type="checkbox"/>were not available.</p> <p>The facility did not have adequate records demonstrating compliance with this requirement. They had invoices showing their purchases for the last month or two, but have not created a record format showing their usage and the voc content. I informed Ken Spires, the paint shop manager, what type of records the facility should be keeping, which should include the product, the amount of product used, the voc content of the product, and the pounds/gallon used on a daily basis averaged monthly. Per Wayne Martin, we will not consider this a violation and will use this as an opportunity to provide compliance assistance given the facility received the permit only two months ago. We will give them time to start keeping proper records and request one month's worth (January) to be turned in to us the first part of February.</p>
I N	M N C	S N C	<b>C. Selected General Conditions and Procedures</b>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><b>Administrative Corrections.</b> 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><b>Comments:</b> There have been no administrative changes to report.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><b>Equipment Changes.</b> 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><b>Comments:</b> There have been no equipment changes to report.</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 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><b>Comments:</b> There were no instances of non-compliance to report.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><b>Valid Permit</b></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><b>Comments:</b> The permit is valid.</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</p>

## Surface Coating Operations – General Permits

I N C	M N C	S N C	
			<b>C. Selected General Conditions and Procedures</b>
			<p>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.</p> <p>62-210.310(2)(b)2.</p> <p><b>Comments:</b> Re-registration is not needed at this time.</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, 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.</p> <p>[General Conditions - 62-210.310(3)(a), F.A.C.]</p> <p><b>Comments:</b> <i>The permit expires on 10/2/2015. A new notification form is required to be submitted no later than 9/2/2015.</i></p>
			<b>D. Other:</b>
			<b>Pollution Prevention Activities</b>
➤			P2 Handouts Provided: <input type="checkbox"/> P2 Brochure; <input type="checkbox"/> P2 Manual; <input type="checkbox"/> P2 Checklist
➤			Have any emissions reductions occurred <input type="checkbox"/> Yes / <input type="checkbox"/> No _____
			<input type="checkbox"/> Chemical Substitution; <input type="checkbox"/> Equipment Changes; <input type="checkbox"/> Process Changes
			<input type="checkbox"/> Chemical/Material Reuse; <input type="checkbox"/> On-site Recycling; <input type="checkbox"/> Other: _____
			<b>Comments:</b>
Closing Conference			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Other Comments:			
<p>I briefly spoke with Ben Zaccagnino after my tour before he had to depart for a meeting. I informed him the record requirement does not seem to be being met and explained what we are looking for in that regard. He asked Ken to meet with me and take notes so they can be sure to do things properly. After Ben left, Ken and I read through the general permit requirements. I emphasized the record keeping requirements and reiterated the type of documentation that would suffice: i.e. a spreadsheet noting the product name, amount used, voc content and lbs used per day calculation. I further informed Ken that it appears they are non-compliant at this time and it may lead to enforcement and possible penalties; however, I proceeded to also state that it may be possible this would not be considered non-compliance with enforcement, rather be used as compliance assistance to get them into compliance with the record-keeping requirement, but my supervisors would make that decision. I closed with Mr. Beaver stating I would be in touch with him after discussing the matter with my supervisor(s).</p> <p>12/15/10I discussed the issue with Wayne; we will not pursue enforcement - this will be treated as compliance assistance for a new permit and initial inspection. We will allow them time to begin proper recordkeeping documentation and request a copy for the month of January to ensure compliance. Will follow-up in February.</p> <p>12/16/10 – I left a message for Ben Zaccagnino requesting a call back to discuss our recordkeeping expectations. As of COB 12/20/10, I have not heard from him.</p>			
<b>Inspector(s):</b> Shannon Ransom, Pinellas County, Air Quality Division			
<b>Signature(s)</b>			Date:

CONTACT LOG? \_\_\_\_\_, ACCESS? \_\_\_\_\_, ARMs? \_\_\_\_\_