



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#: 1030541 **DATE:** 12/14/12 **ARRIVE:** ~ 11:15 AM **DEPART:** ~ 12:45 PM

FACILITY NAME: United Advantage Sign Companies

FACILITY LOCATION: 208 Tower Drive
Oldsmar, FL

RESPONSIBLE OFFICIAL: Stephen Higgar **PHONE/email:** 813-855-6476 /

CONTACT NAME: Ben Zaccagnino **PHONE/email:** 813-855-6476 / bzack@unitedsignsystem.com

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 (SC)
- 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

Brennan Farrington

Inspector's Name (Please Print)

12/14/12

Date of Inspection

Inspector's Signature

~ 10 / 2013

Approximate Date of Next Inspection

COMMENTS: I met with facility contact and VP/General Manager Ben Zaccagnino who provided records and answered questions about the facility. I also was escorted by Estimator Ken Beaver through the facility and to the paint/ prep area. There I met with the paint and preparation department Supervisor Ken Spires who answer my specific questions relative to operational processes. The facility was very clean, well maintained, and organized. Daily logs of material usage were observed being utilized by the paint department. Mr. Spires demonstrated equipment cleaning procedures and solvent recycling. Mr. Spires also provided EPA 6H documentation including painter training and certifications.

Some of the Daily Record Keeping logs provided do not indicate the year of the record and/or have inaccurate daily dates under the corresponding month (i.e. months 4/12 and 5/12 have some daily dates that are labeled 1/2,1/3,1/4 etc.) The daily record keeping logs are being kept for paints used assuming the highest "as applied" VOC content for miscellaneous colors from the manufacturer. Daily logs should be more accurately labeled to reflect this. Units of "Amount Used" should be designated on the daily logs. The daily records also document the amount of lacquer thinner used in the equipment cleaning operation. The thinner is recycled and then reused in the process. The record keeping logs do not take into account the recycled portion of the thinner. The daily VOC calculations assume that no recycling occurs.

The facility never exceeded the 44lbs. VOC/ day limit (averaged monthly) according to the records provided and appears compliance with the issued General Permit. A written administrative correction changing the Authorized Representative from James DeLellis to

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Stephen Higgar was not performed since previous inspection on 10/18/11. I contacted Ken Beaver by phone and email to provide compliance assistance for this issue. A verbal warning concerning this issue was given via email to the facility per TLA.

According to the FDEP Notice of Permit Determination letter to the facility dated 08/06/2010, the facility has been issued an exemption from requiring an air permit based on complying with certain conditions. The conditions state that “the facility does not use more than 750 gallons of paint, coating, and/ or solvents that contain VOCs in any calendar year ...” and records shall be kept to demonstrate this compliance at the facility. In reviewing the records provided during inspection, I calculated the gallons of paint and coatings that were used from 01/2/2012 to 11/21/2012 to be ~ 867 gallons and regularly exceed 15 lbs. of VOC per day. This figure excludes any lacquer thinner used in clean up since it was indistinguishable from the amount of thinner recycled according to the logs. I recommend that this information be expanded upon and RACT applicability be considered.

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