



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:** 10/15/13      **ARRIVE:** ~9:45 AM      **DEPART:** ~11:30 AM  
**FACILITY NAME:** United Advantage Sign Companies      **Per\_ID:** 2892      **PERMIT NO.:** 1030541-001-AG  
**FACILITY LOCATION:** 208 Tower Drive  
Oldsmar, FL  
**EMISSION UNIT DESCRIPTION:** 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 coatings and solvents.  
**OWNER/AUTHORIZED REPRESENTATIVE:** Stephen Higger      **PHONE/email:** 813-855-6476 / shigger@unitedsignsystems.com  
**CONTACT NAME:** Ben Zaccagnino      **PHONE/email:** 813-855-6476 / ben@advantagesignco.com  
**REMITTANCE YEAR:** 2015      **ENTITLEMENT PERIOD:** 10/2/10 / 10/2/15  
(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? (see how coatings are defined in item 5 below) [62-210.310(4)(c)2.b., F.A.C.] -----  Yes  No
- 3. Does the owner/operator retain, and make available for Department inspection, these records for a period of at least five years? [62-210.310(4)(c)2.b., F.A.C.] -----  Yes  No

**Comments:** The records were available back to 1/2013. A partial copy of the records are attached as an example of the record format.

- 4. Is the total quantity of VOC's in such coatings 44 lbs/day or less, averaged monthly? -----  Yes  No  
[62-210.310(4)(c)2.a., F.A.C.] (total lbs VOC ÷ # days/mo = VOC lbs/day)

**Comments:** Reviewed records for the months of 1/1/2013 through 9/26/13 The highest reported monthly daily average was 9.96 (September 2013) pounds. Supporting documentation was available ----- **Some documentation was not available**-----  Yes  No

- 5. Does the amount of coatings used, include solvents and thinners used in the process including those used

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for cleanup? [62-210.310(4)(c)2.a., F.A.C.]-----  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 specific emissions limiting standard such as VOC Reasonably Available Control Technology (RACT), Chapter 62-296.500, F.A.C.? [Rule 62-210.300(3)(c)4.b., F.A.C.]----- **Unable to determine. Records are inaccurately kept. (SC)**  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
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.**

#### **Administrative Changes:** [62-210.310(2)(d), F.A.C.]

1. Were there 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 any other similar minor administrative change at the facility? -----  Yes  No
2. If yes, did the facility provide written notification within 30 days of the change? -----  Yes  No

#### **Permit Effective Period** – [62-210.310(3)(a), F.A.C.]

1. Is the general permit for this facility still within the 5- year effective period?-----  Yes  No
2. Did the facility submit the new re-registration form at least 30 days prior to permit expiration? -----  N/A  Yes  No

*Comments: The permit expires on 10/2/15. A new notification form is required to be submitted no later than 9/2/15.*

#### **New or Modified Process Equipment or Change in Ownership** - [62-210.310 (2)(b)2, F.A.C]

1. Since the last registration form submittal 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 with equipment that is substantially different? -----  Yes  No
  - d) A change in ownership? -----  Yes  No

If any of the answers to 1a) – 1)d) is **Yes**, was a new registration form and appropriate submitted 30 days prior to the change?-----  Yes  No

#### **Noncompliance Notice:** - [62-210.310(3)(i), F.A.C.]

1. Did the facility have any instances where they were unable comply with or will be unable to comply with any condition or limitation of the air general permit? ----- **Unable to verify at this time**  Yes  No  
 If the answer is **Yes**, proceed to a) and b).
  - a) Did the owner or operator provide immediate notification to the Department? -----  Yes  No
  - b) Did the notification include:
    1. A description of and cause of noncompliance?-----  Yes  No
    2. Dates and times of noncompliance; or if not corrected, the anticipated time noncompliance is expected to continue and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance? -----  Yes  No

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### **PART V: INSPECTION COMMENTS:**

The facility's coatings usage records were discovered to be kept inaccurately upon initial inspection. On-site inspection was performed and some VOC content documentation was available on 10/15/13. Mr. Zaccagnino was not available on-site to provide usage records. Some VOC content documents were not available on-site. I met with Mr. Ken Beaver who attempted to provide me with MSDS and usage logs. The facility paint manager, Mr. Ken Spires, informed the inspector that the black and silver paints used at the facility were mostly the Matthews conventional line of paints (i.e. Matthews Satin MAP Mixing Base N929SP, N952SP, and N953SP, N954SP which are 4.51 – 4.84 lb. VOC / gallon paint only). Mr. Spires also explained that the facility uses the higher VOC containing primer product, Matthews PT Filler. I observed one can of lower VOC primer (Matthews primer non-chrome) on-site. Mr. Spires stated that he had attempted to use the low VOC coating products but that they did not work well and he returned to using the products he was used to.

Mr. Zaccagnino emailed the most current coatings usage logs for 1/1/2013 through 9/26/13 on 10/15/13. The facility regularly listed two types of low VOC coatings (MAP-LV Silver, MAP-LV Anodic blk which listed 2.18 and 1.11 lbs. VOC/ gallon respectively) that were not observed to be used during the on-site inspection. At this time I scheduled a meeting to re-inspect with Mr. Zaccagnino on 10/17/13. I confirmed and verified with Mr. Zaccagnino and Mr. Spires that the records have been inaccurately logged with respect to the coating type and associated VOC content. Mr. Zaccagnino stated that he was unaware that the paint department had stopped using low VOC paints. Mr. Zaccagnino stated that he would investigate when the paints changed, re-calculate the VOC emitted, and re-submit the corrected records ASAP. At this time, I also informed Mr. Zaccagnino that I would need to have purchase records to verify the materials being used.

There was documentation on the initially submitted usage log that the primer coating had changed and subsequent documentation of some usage beginning 9/3/13.

I was also unclear about the amount of lacquer thinner used and its method of documentation. The paint department does in-house recycling of the used lacquer thinner. Some of this thinner is then distributed to different departments to be used. Some of the thinner is also disposed of when it cannot be reused. I advised Mr. Zaccagnino that it may be more accurate to evaluate the amount of thinner purchased versus the amount discarded as waste to achieve a true amount of usage.

Mr. Zaccagnino re-sent corrected records on 10/18/13 via email. He stated that the change in paints from low VOC to conventional VOC occurred beginning 8/19/13 and re-submitted calculations from that date to 10/17/13. The daily VOC emitted remained less than 44 lbs. /day averaged monthly and in compliance with GP rule emission limitations. The black and silver categories in the daily log were changed to standard paints and an additional category of "non reflective white ultra LV" was added and accounted for as 0.16 lbs. VOC/ gallon coating.

The re-submitted daily calculations for 8/19/13 thru 10/17/13 show 8 days exceeded 15 lbs. VOC emitted.

Mr. Zaccagnino stated that he will begin to use updated spreadsheets with more accurate coating categories. He also stated in an email on 10/22/13 that the facility is in the process of getting all low and ultra low VOC paints on-site. He also stated that training for the use of these low VOC paints is to be provided by the manufacturer representative.

On 10/24/13, I spoke with Mr. Zaccagnino and again asked for purchase records of coatings for the past 12 months. Mr. Zaccagnino was initially not willing to provide these records unless they were absolutely required. I stated that they were necessary to verify the inspection results, submitted usage data, and assure compliance with other potentially applicable rules since the initial usage record had been inaccurately kept. Mr. Zaccagnino stated that he would not be able to provide these records until the week of 11/18/13. I stated that I would follow up with an official letter to request the information. The information request letter was sent from PCAQD dated November 14, 2013.

Mr. Zaccagnino sent all daily usage records for 2010 through the current records in 2013 on 11/27/13 via email. This email also contained a facility generated chart of products and VOC content. A facility generated list of purchased materials for 1 year was provided on 12/6/13 via email.

From 11/1/2012 to 10/31/13 the facility's daily usage logs indicate the facility used 676 gallons of coatings and lacquer thinner. The purchase record indicates approximately 720 gallons of VOC containing material was purchased. This usage appear to be under the FDEP guidance threshold of 750 gallons per year for the current year however the facility has exceeded 750 gallons in the previous year and a Request for permit Determination was sent to FDEP dated 1/28/13. A review of the purchase record compared to the daily usage records appear to indicate that the daily usage records are still not accurate after corrections to the daily records were re-submitted for the time period of 8/19/13 through 10/17/13.

First, the daily usage records indicate that the facility used "Matthews primer non chrom" (3.5 lbs. VOC/ gal) throughout the year with the exception of a time period beginning 9/3/13 through 10/17/13 when "Math PT filler prime" (6.4 lbs. VOC/gal) was used as a trial product. The purchase records indicate that more of the higher VOC primer material was purchased than the lower VOC primer over the last year. The purchase record indicates that 58 gallons of "Math PT filler prime" (Product #'s 74 760 & 74 766 mixed at 1:1 ratio) was purchased compared to 49 gallons of "Matthews primer non chrom" (Product #'s 74 350 & 74 351 mixed at a 1:1 ratio). This indicates the daily usage records are not accurate. The daily records display that only 26.75 gallons of the "Math PT filler prime" was

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used for the year but 58 gallons were purchased.

Second, the daily usage record show that “Matthews MAP-LV Silver” (2.18 lbs. VOC/gallon) was used throughout the year with the exception of the re-submitted time period of 8/19/13 to 10/17/13 when the “Matthews MAP stand Silver” (5.3 lbs. VOC/gallon) was used. The purchase record indicates a 65 gallons of conventional (~ 5 lbs VOC/ gallon) silver and brushed aluminum color paints (Product #'s: 41 342, N 951, N 953, N 954) were bought compared to 12 gallons of the low VOC brushed aluminum (LVSFP342) purchased. The daily usage logs indicate that 22.25 gallons of “Matthews MAP stand Silver” was used in the last year but it appears that 65 gallons of conventional VOC silver and brushed aluminum paint was purchased in the last year.

Similarly, the daily records indicate that “Matthews MAP-LV Anodic blk” (1.11 lbs. VOC/gal) was used throughout the year with the exception of the re-submitted time period of 8/19/13 to 10/17/13 when the “Matthews MAP stand black” (5.3 lbs. VOC/gallon) was used. The purchase record indicates that 47 gallons of conventional (~ 5lbs. VOC/ gal.) black color paints (Product #'s N 923and N 929) compared to 28 gallons of the low VOC carbon back (LVS 929). The daily usage logs indicate that 23.875 gallons of “Matthews MAP stand black” was used but it appears that 47 gallons of conventional VOC black paint was purchased.

The purchase records also indicate that 39 gallons of low VOC white (281 500 and LVU 100) was purchased compared to 18 gallons of conventional white paints (6425SP, N 202). Other miscellaneous colors purchased including clear coat add up to ~ 49 gallons. An inventory of ~ 50-75 gallons was observed stored on-site during the inspections on 10/15 and 10/17/13. 38 gallons of lacquer thinner were purchased in one year and no waste manifest has been received.

On 10/18/13 Mr. Zaccagnino stated that the facility switched from using low VOC paints to conventional paints only from the time period of 8/19/13 to the time of inspection (~10/19/13) and submitted “corrected” daily usage logs. It appears from examining the facility generated purchase record that conventional VOC paints were used more than indicated on the daily usage unless significant waste manifest would show otherwise. Additionally, reviewing the resubmitted records of 2012 and 2011, it does not appear that the facility met requirements set forth in a Permit Determination Request response by FDEP in an email dated 03/14/13 from Mr. Danny Stubbs. The letter states “ Based on the information received by the Department , it has been determined that an air pollution permit for the facility is not required provided United Advantage Sign Companies is able to provide PCAQD with reasonable assurance that all of the daily records that showed the total VOCs in all coatings used above the 15 pounds per day limit were due to miscalculation and provided that going forward they continue to keep accurate daily records that demonstrate that are at or below the total VOCs in coating usage limit of 15 pounds per day and therefore exempt from Rule 62-296.500 through 62-296.516, F.A.C.”

Mr. Zaccagnino notes in a email to inspector Farrington dated 11/27/13 a list of some coatings that were used, some that will be stopped using and some that will be used going forward.

Inspection Entered into AQACCESS?  Yes

INSPECTION ENTERED INTO ARMs?  Yes

Brennan Farrington  
Inspector(s)

10/15/13 & 10/17/13  
Inspection Date

\_\_\_\_\_  
Signatures