



SURFACE COATING OPERATIONS

COMPLIANCE INSPECTION CHECKLIST



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

AIRS ID#: 1030545 **DATE:** 4/29/11 **ARRIVE:** 1:00 PM **DEPART:** 2:30 PM

FACILITY NAME: Nu Launch 10 LLC

FACILITY LOCATION: 6677 Treeland Avenue
Largo, FL

RESPONSIBLE OFFICIAL: Michael J. Tenorio **PHONE:** 727-455-4669

CONTACT NAME: Michael J. Tenorio? **PHONE:** 727-455-4669

REMITTANCE YEAR: N/A **ENTITLEMENT PERIOD:** 2/22/10 / 1/21/2016
(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

Mike Ojo Thomas

4/29/11

Inspector's Name (Please Print)

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

FACILITY: Nu Launch 10 LLC		Per_ID: 3498	DISTRICT: Southwest
ADDRESS: 6677 Treeland Avenue Largo, FL		CONTACT: Phone No: 727-455-4669	
ARMS No.: 1030545	PERMIT NO.: 1030545-001-AG	EXPIRATION DATE: 1/21/2016	
EMISSION UNIT DESCRIPTION: Miscellaneous metal parts coater, using both powder and liquid coatings. Operate two 18' X 8' X 8' open face conveyorize paint spray booths and powder coat bake off ovens. A recycling recovery still is used. Possible 63 subpart 6H facility			
INSPECTION DATE: 4/29/11	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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<i>Comments: This inspection was performed in order to determine if facility has been operating within applicable regulations. Mr. Michael Tenorio (Owner) was present during the facility inspection of the emission unit. He was not able to provide paint and solvent usage record for review. Mr. Tenorio stated he not yet has chemical usage record ready. Michael Tenorio stated he started operation on 3/28/11. I asked Mr. Tenorio to submit the VOC content and the quantity of coating usage record to the AQ Division office by 5/15/11.</i>			
3.	Is the Authorized Representative still: <u>Michael J. Tenorio</u> ?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<i>Comments: Mr. Tenorio is stills the Authorized Representative</i>			
4.	Is the facility contact still: Michael J. Tenorio?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<i>Comments: Mr. Tenorio is stills the facility contact</i>			
I N C	M N C	S N C	B. Specific Conditions
<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 has no other general air permit, and no other emission units which would require permitting. The spray booth is open face.</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 _____n/a_____ The highest reported monthly daily average was _____n/a_____ pounds. Supporting documentation was available (<input type="checkbox"/> Yes or <input type="checkbox"/> No).</i> <i>Note: Facility was not able to provide paint and solvent usage record for review. Mr. Tenorio stated he not yet has chemical usage record ready. I asked Mr. Tenorio to submit the VOC content and the quantity of coating usage record to the AQ Division office by 5/15/11.</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 back to _____n/a_____. 12 month consecutive totals <input type="checkbox"/> were</i>

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I N	M N C	S N C	
			B. Specific Conditions
			<input type="checkbox"/> were not available. A partial copy of the records are attached as an example of the record format. <i>Note: Facility was not able to provide paint and solvent usage record for review. Mr. Tenorio stated he not yet has chemical usage record ready. I asked Mr. Tenorio to submit the VOC content and the quantity of coating usage record to the AQ Division office by 5/15/11.</i>
I N	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 have not been any changes in facility information or ownership.</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: The facility has not made any equipment changes.</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 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: The facility did not have any non compliance issues to notify Pinellas County Air Quality Division of since beginning operations.</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 facility emission unit permit is valid through 1/21/2016.</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; b. Change of ownership of all or part of the facility; c. Proposed new construction, modification, or other equipment change that requires registration pursuant to paragraph 62-210.310(2)(e), F.A.C.; and d. Any other change not considered an administrative correction under paragraph 62-210.310(2)(d), F.A.C.</p>

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I N C	M N C	S N C	
			C. Selected General Conditions and Procedures
			62-210.310(2)(b)2. <i>Comments: The facility would be entitled for re-registration after 1/21/2016.</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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. [General Conditions - 62-210.310(3)(a), F.A.C.] <i>Comments: The permit expires on 1/21/2016. A new notification form is required to be submitted no later than 12/22/2015.</i>
D. Other:			
Pollution Prevention Activities			
➤ 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: _____			
<i>Comments:</i>			
Closing Conference I told Mr. Tenorio the emission unit is deemed to be in compliance.			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Other Comments: Michael Tenorio the (owner) stated he started operation on 3/28/11. He was not able to provide paint and solvent usage record for review. Mr. Tenorio stated he not yet has chemical usage record ready. I provide Mr. Tenorio compliance assistance as relate to his responsibility under general permit rules. I reviewed the general permit rules with Mr. Tenorio. I remind him he needed to maintain paint and solvent usage record onsite. He stated he had contact his vendor for assistance on the chemical usage. I asked Mr. Tenorio to submit the VOC content and the quantity of coating usage record to the AQ Division office by 5/15/11. I gave Mr. Tenorio a verbal warning for failure to maintained records onsite. I told him if he fails to keep chemical usages record onsite in the future could result in a Notice of Violation with possible penalty.			
Inspector(s): Mike Ojo Thomas, Pinellas County, Air Quality Division			
Signature(s)			Date:

CONTACT LOG? _____, ACCESS? _____, ARMs? _____

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