



# Florida Department of Environmental Protection

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Jonathan P. Steverson  
Secretary

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

## PERMITTEE

Crom, LLC  
250 SW 36<sup>th</sup> Terrace  
Gainesville, Florida 32607

Authorized Representative:  
Gene Roane, Plant Manager

Air Permit No. 0010124-005-AF  
Federally Enforceable State Operation Permit

The Crom Job Servicing Division/ Crom  
Equipment Rental  
Alachua County, Florida

## PROJECT

This is the final Federally Enforceable State Operation Permit, which renews the operation of The Crom Job Servicing Division/ Crom Equipment Rental, which fabricates small fiberglass components for the tanks (i.e. hatch covers, vent covers, ladders and etc.), for the (off-site) manufacturing of large prestressed concrete tanks designed and built for water and wastewater usage. Equipment maintenance (wet sand blasting and painting) and construction equipment rental, (Standard Industrial Classification No. 1542). This project renews the existing facility with no requested changes. The facility is located in Alachua County at 6801 SW Archer Road, in Gainesville, Florida. The UTM coordinates are Zone 17, 363.20 km East, and 3275.4 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

**Permitting Authority:** Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Northeast District Office. The Permitting Authority's physical address is: 8800 Baymeadows Way, W., Suite 100, Jacksonville, Florida 32256. The Permitting Authority's mailing address is: 8800 Baymeadows Way, W., Suite 100, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 904/256-1700.

**Petitions.** A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known;

## FINAL PERMIT

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(b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**Effective Date:** This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

**Judicial Review:** Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Upon issuance of this final permit, any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

**0010124-005-AF Effective Date: January 25, 2016**  
**Renewal Application Due Date: November 26, 2020**  
**Expiration Date: January 25, 2021**

Executed in Jacksonville, Florida



Richard S. Rachal III, P.G.  
Program Administrator  
Permitting Program

## FINAL PERMIT

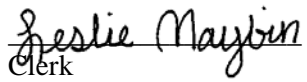
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### FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that this Federally Enforceable State Operation Permit and all copies were sent before the close of business on January 25, 2016 to the listed persons.

Mr. Gene Roane, Plant Manager – Crom, LLC ([gpr@cromcorp.com](mailto:gpr@cromcorp.com))

Mr. Bob Baker, P.E. – Baker Environmental Engineering, Inc. - ([baker@atlantic.net](mailto:baker@atlantic.net))

  
Clerk

January 25, 2016  
Date

## SECTION 1. GENERAL INFORMATION

### FACILITY DESCRIPTION

This facility fabricates small fiberglass components for the tanks (i.e. hatch covers, vent covers, ladders and etc.), for the (off-site) manufacturing of large prestressed concrete tanks designed and built for water and wastewater usage. Equipment maintenance (wet sand blasting and painting) and construction equipment rental.

The facility has requested a facility-wide Styrene emissions cap of less than 10 tons per year and an emissions cap of less than 25 tons per year of Hazardous Air Pollutants (HAPs). In Specific Condition No. 3 of the permit, Crom, LLC has a Styrene limit of 8.45 TPY, Total HAP limit of 24.9 TPY, and 44.22 TPY of VOC. These caps will be based on a production throughput limit of 160,000 pounds per year of gelcoats and resins.

The existing facility consists of the following emissions units (EU).

Emission Unit No.	Description
001	Equipment Painting
002	Sandblasting
003	Fiberglass Shop

Operations at this location are as follows:

1. Warehousing,
2. Roll-forming,
3. Metal fabrication,
4. Mechanical task,
5. Aluminum fabrication,
6. Painting,
7. Fiberglassing,
8. Pre-cast concrete fabrication, and
9. Lumber supply and building of wooden forms

**Subpart XXXXXX**—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. The NAICS code for Crom, LLC is 236220 – Commercial Building Construction. The facility supports their building of large concrete water tanks throughout the country. They make parts for the water tanks at the facility and then ship them to the site. Some of these items are fiberglass parts and metal ladders, handrails and stairs. The regulation 40 CFR 63 Subpart XXXXXX states for fabricated metal parts it is applicable to “establishments primarily engaged in the manufacturing fabricated metal parts...” Crom, LLC is primarily engaged is making fiberglass parts and metal parts to support their construction projects off-site, and **is not subject to this subpart.**

### Polyester Resin Plastic Fabrication (Fiberglass Shop)

The fiberglass building is used for fabrication of polyester plastics including access ladders, vents, hatch covers, cascade trap aerators, and other accessories for the concrete tanks manufactured off-site. The fabrication room is approximately 21 feet wide by 71 feet long by 11 feet tall. The annual average usage rate of resins, gel coats, catalysts, etc., purchased during the last 12-month period was 46,998 pounds.

Flow tips, internal mixing gel coat, and chopping guns are all designed to dispense material with low emissions. Six (6) exhaust fans with louvers are used to exhaust this room to the atmosphere. All fans are equipped with filters that are changed every week.

## SECTION 1. GENERAL INFORMATION

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Acetone is used to clean equipment used in the fiberglass and painting operations.

In accordance with 40 CFR 63.5785(a), a facility is subject to **Subpart WWW**—National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production if it is located at a major source of HAPs. Crom, LLC is a minor source of HAPs and therefore **is not subject to this subpart**.

### Painting

Painting of rental equipment is performed in one 3-sided building with water reducible paint to minimize emissions. According to purchase records for the last 12-month period, the quantity of paint used was approximately 902 gallons. The spray building has an exhaust system that filters the air prior to ambient air release. Spray paint cans are used in touchup operations.

In accordance with 40 CFR 63.11180 of **Subpart HHHHHH**, is not applicable since Crom, LLC does not spray paints with the *Target HAPs* Chromium, Lead, Manganese, Nickel or Cadmium contents, and **is not subject to this subpart**.

### Sandblasting

Sandblasting operations occur within two pole barn buildings with two of the four sides enclosed. An elevated sand hopper is used to store the sand. An elevated sand hopper is used with approximately 225 tons of sand purchased (18.75 tons per month, average) during the last 12-month period. Sandblasting is performed with a water nozzle which effectively reduces the unconfined particulates released.

### Fuel Used

The facility uses diesel fuel to fuel the fork lifts trucks. Natural gas and LP gas space heaters are used for heating onsite sources.

## FACILITY REGULATORY CLASSIFICATION

- The facility **is not** a major source of hazardous air pollutants (HAP).
- The facility **has no** units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility **is not** a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility **is not** a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

## APPLICABLE REGULATIONS

These emissions units are subject to the requirements of Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Northeast District Office. The Northeast District Office physical and mailing address is 8800 Baymeadows Way, W., Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office Air Permitting.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office Compliance Assurance Section at: 8800 Baymeadows Way, W., Suite 100, Jacksonville, Florida 32256. The Compliance Authority's telephone number is (904) 256-1700.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Renewal: Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. [Rule 62-4.090, F.A.C.]
8. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) District Office. All synthetic non-Title V sources or all facilities with the potential to emit 10 tons/year or more of volatile organic compounds (VOC) or 25 tons/year or more of nitrogen oxides (NO<sub>x</sub>) and located in an ozone nonattainment area or ozone air quality maintenance area shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]

*{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at [eaor@dep.state.fl.us](mailto:eaor@dep.state.fl.us).}*

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### EU001, 002 and 003

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
001	Equipment Painting. Painting of rental equipment is performed in one 3-sided building with water reducible paint to minimize emissions. The spray building has an exhaust system that filters the air prior to ambient air release. Spray paint cans are used in touchup operations. Estimated maximum throughput rate of 6,600 gallons per year of paint.
002	Sandblasting. Sandblasting operations occur within two pole barn buildings with two of the four sides enclosed. An elevated sand hopper is used to store the sand. Sandblasting is performed with a water nozzle which effectively reduces the unconfined particulates released. Estimated maximum throughput rate of 780 TPY of sand (sandblasting).
003	Fiberglass Shop. The fabrication room is approximately 21 feet wide by 71 feet long by 11 feet tall. Flow tips, internal mixing gel coat, and chopping guns are all designed to dispense material with low emissions. Six (6) exhaust fans with louvers are used to exhaust this room to the atmosphere. All fans are equipped with filters that are changed every week.

These emissions units are subject to the requirements of Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards.

#### PERFORMANCE RESTRICTIONS

- Hours of Operation.** The hours of operation of each emissions unit are not limited (8760 hours per year).  
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
- Permitted Capacity.** The maximum operating rate is listed in the table(s) below and shall not be exceeded without prior Department approval.

Emission Unit	Description	Throughput	
003	Fiberglass Shop	160,000 lbs/year Gelcoat and Resin	<b>Note (1)</b>

**Note (1)** Emissions cap requested by applicant to become a synthetic non-Title V Source for HAPs and VOC.

#### EMISSION STANDARDS

- Permitted Maximum Emissions Rate.** The maximum emissions rates are listed in the table(s) below and shall not be exceeded without prior Department approval.

POLLUTANT	EMISSION RATE Tons per year	
Each Individual HAP	8.45	<b>NOTE (1) and (2)</b>
Total HAP Emissions	24.9	<b>NOTES (1) and (2)</b>
VOC Emissions	44.22	<b>NOTES (1) and (2)</b>

**NOTE (1)** Basis: Material usage rate; Material density; Constituent Factor (% by weight):  
Each Individual HAP =  $[(0.714 \times \% \text{ styrene}) - 0.18] \times 2,000 = \text{lb/ton HAP}$

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

EU001, 002 and 003

### Specific Condition No. 3. Continued:

Each Individual HAP =  $[(0.169 \times \% \text{ styrene})] \times 2,000 = \text{lb/ton HAP}$  (Styrene content of less than 33%)  
Total HAP Emissions =  $[(0.714 \times \% \text{ styrene}) - 0.18] \times 2,000 = \text{lb/ton HAP}$

**NOTE (2)** Emissions cap requested by applicant to become a synthetic non-Title V Source for HAPs and VOC.

[Permit Application received February 21, 2006; Permit Application received February 9, 2011]

4. **General Visible Emissions Standard (Facility-Wide).** This facility is subject to attached Combined Appendices, Section 4., Appendix C, Common Condition No. 8.

### RECORDS AND REPORTS

5. **Material Safety Data Sheets.** The vendor information or Material Safety Data Sheets containing the VOC and HAP Contents for each material used must be available upon inspection of the facility. The VOC Content and HAP Content values for each material are used in calculation of emission limits in **Specific Condition 3.**

[Rule 62-210.300(2)(b), F.A.C.]

6. **Recordkeeping.** Compliance with **Specific Condition Nos. 2 and 3** shall be determined by recording and maintaining the following data in a monthly log:

Quantity	
• Gallons of Material Used (Gelcoat and Resin)	
Emissions Factors	
• Density of Material (Pounds per Gallon)	• Constituent Factor (Percent by Weight Emitted)
Emissions	
• Total Cumulative Emissions in Tons (Determined from 12- Month Rolling Average VOC and HAP Emissions)	

**NOTE:** Emissions Factors and Emissions Calculation Methods shall be consistent with those used in the permit application and/or modification requests.

7. The Permittee shall submit to the Department with the Annual Operating Report required in Administrative Condition No. 8.: the documentation required in **Specific Condition Number 5**; a report containing the data required in **Specific Condition Number 6**; and a copy of the monthly facility usage logs (emissions records).
8. The Permittee will regularly review the cumulative 12-month rolling average emissions of VOC and each HAP, and compare them to the limitations stated in **Specific Condition 2 and 3** in order to verify compliance. This review will also enable the Permittee to operate equipment, vary production rates and schedules, and make operating adjustments in a manner that is consistent with meeting the limitations stated in **Specific Condition 2 and condition 3.**



### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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#### EU001, 002 and 003

9. **VOC.** This facility is subject to procedures to minimize VOC emissions shall include, but not be limited to the requirements of attached Combined Appendices Section 4., APPENDIX C, Common Condition No. 6.

[Rule 62-296.320(1), F.A.C.]

10. **Objectionable Odor.** This facility is subject to the requirements of attached Combined Appendices Section 4., APPENDIX C, Common Condition No. 7.

[Rule 62-296.320(2), F.A.C., Objectionable Odor Prohibited; and Rule 62-210.200(200), F.A.C., Definitions-Objectionable Odor]

11. **Unconfined Emissions of Particulate Matter.** This facility is subject to the Unconfined Emissions of Particulate Matter requirements of attached Combined Appendices Section 4., APPENDIX C, Common Condition 9.

[Rule 62-296.320(4)(c), F.A.C.]

12. **Special Compliance Tests.** This facility is subject to the Special Compliance Tests requirements Combined Appendices Section 4., Appendix D, Common Testing Requirements Condition No. 8.c.

[Rule 62-297.310(8)(c), F.A.C.]