



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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GOVERNOR

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8800 BAYMEADOWS WAY WEST, SUITE 100  
JACKSONVILLE, FLORIDA 32256

HERSCHEL T. VINYARD JR.  
SECRETARY

## PERMITTEE

PRIDE Enterprises  
1913 NW 60th Lane  
Gainesville, Florida 32653

Air Permit No. 0030005-006-AF  
Issuance Date: December 31, 2013  
Expiration Date: December 31, 2018

Authorized Representative:

Baker Paint Manufacturing

Mr. Kip Fisher, Safety and Environmental Manager

## PROJECT AND LOCATION

This operation permit renews the previous operation permit, No. 0030005-004-AF. The existing facility PRIDE Enterprises, Baker Paint Manufacturing is a Paint Manufacturing and Pigment Handling Facility (Standard Industrial Classification No. 2851). The facility is located in Baker County at 12 Miles East of Lake City on US 90 East, Sanderson, Florida. The UTM coordinates are Zone 17, 368.00 km East, and 3343.00 km North.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-Wide Conditions

Section 4. Emissions Unit Specific Conditions

Section 5. Appendices

This Air Operation Permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to operate in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Mail Station 35, 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 of Appeal must be filed within 30 days after the Final Order is filed with the Clerk of the Department, 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.

## NON-TITLE V AIR OPERATION PERMIT

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The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida



Richard S. Rachal III, P.G.  
Program Administrator  
Waste and Air Resource Management

### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Notice of Issuance and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on **December 31, 2013** to the persons listed below.

Mr. Kip Fisher, Safety and Environmental Manager, PRIDE Enterprises, ([KFisher@Pride-Enterprises.org](mailto:KFisher@Pride-Enterprises.org))  
Mr. Timothy M. O'Dell, Environmental Sciences Group, Inc., ([odellt@environmentalsciencesgroup.com](mailto:odellt@environmentalsciencesgroup.com))

Clerk Stamp  
FILING AND ACKNOWLEDGMENT FILED, on this date,  
pursuant to Section 120.52(7), F.S., with the designated agency  
clerk, receipt of which is hereby acknowledged.



(Clerk)

December 31, 2013  
(Date)

## SECTION 1. GENERAL INFORMATION

### FACILITY AND PROJECT DESCRIPTION

#### Existing Facility

This facility manufactures water-based traffic paints using methanol. The paints consist of a water-based emulsion along with various binders, pigments, and dispersion agents to produce the final product.

The facility consists of two, above ground 250 gallon mixing tanks, storage totes and containers. Powdered paint pigments, colorants, and fillers (calcium carbonate), are added directly into the mixing tanks where solvents (Methanol or Texanol) and non-volatile paint alkyds or acrylic resins are added and mixed depending upon the desired final product. The finished paint is packaged in either totes, drums or pails. Typically, both mixing tanks are in operation simultaneously. A common ventilation system over both mixing tanks directs the air through a 12 inch by 16 inch rectangular exhaust duct.

Any generated particulate matter from the process including any from the pigment handling operation are controlled by a baghouse located inside the facility prior to discharge into the atmosphere.

The potential particulate matter emissions from the pigment handling operation emitted from the baghouse (based on 71,000 tons processed in a year), is such that it is less than the 5.0 ton per year threshold in Rule 62-210.300(3)(b)1., F.A.C. As such this activity is exempt from air permitting pursuant to this rule.

Although not considered to be a significant source of air emissions, this activity is subject to any general, facility-level applicable requirements. The facility is to follow the O & M Plan recommended by the manufacturer.

Collected pigment is recycled back into the process.

The existing facility consists of the following emission units.

Facility ID No. 0030005	
ID No.	Emission Unit Description
001	One Paint Manufacturing Facility with two mixers

#### Air Pollution Control Equipment:

One (1) Torit Baghouse, Model DFO 2-8:

Outlet Gas Flow Rate.....	4,500 CFM
Outlet Gas Temperature.....	Ambient
Cleaning Method.....	Pulse-cleaned in sequence
No. of Cartridges.....	4
Bag Material.....	Ultra-Web® filter
Total Area to Filter Media (sq. ft.).....	1520
Air to Cloth Ratio.....	2.96:1
Manufacturer's Guarantee Outlet loading (grains/acf).....	0.01
Design Pressure Differential.....	± 4.0" W.G.

## SECTION 1. GENERAL INFORMATION

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### FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

This facility has established a federally enforceable VOC emissions limit below the Title V threshold of 100 tons per year, a Methanol emission limit below the Title V threshold of 10 tons per year, and HAP emission limits below the Title V threshold of <10 tons per year for an individual HAP, and <25 tons per year total HAPs combined. The requested emission limitations are federally enforceable and the facility is classified as a Synthetic Non-Title V source.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Northeast District Office, Waste and Air Resource Management. The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District.
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. The mailing address and phone number of the District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Compliance Authority's telephone number is 904/256-1700.
3. Appendices: The following Appendices are attached as part of this permit:
  - a. Appendix A. Citation Formats and Glossary of Common Terms;
  - b. Appendix B. General Conditions;
  - c. Appendix C. Common Conditions
  - d. 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, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the owner or operator from compliance with any applicable federal, state, or local permitting or regulations.  
[Rule 62-210.300, F.A.C.]
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: The permittee shall notify the Compliance Authority upon commencement of construction. 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. Existing Permits and Regulations: The conditions of this permit supplements all other previously issued air construction permits for this facility. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The owner or operator shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, operation of air pollution control devices, and the like. The owner or operator shall also comply with the applicable Rules of 62-4, 62-210, 62-212, 62-296, and 62-297, F.A.C.  
[Rule 62-4.070, F.A.C.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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8. Source Obligation:

- a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
- b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

9. A completed **Application for Air Permit – Non-Title V Source Renewal** [DEP Form No. 62-210.900(4), F.A.C.] shall be submitted to the Department at least 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.

[Rules 62-4.030, and 62-4.050, F.A.C.]

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### SECTION 3. FACILITY-WIDE CONDITIONS

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1. This Federally Enforceable State Operation Permit (FESOP) is a facility-wide permit.  
[Rule 62-210.300(2)(b), F.A.C.]
2. **Facility-Wide Volatile Organic Compound (VOC) Emissions Cap.** The total maximum allowable facility wide VOC emissions from all operations at the facility shall not exceed 24.75 tons in any 12-consecutive month period.  
[Application No. 0030005-003-AF; Rule 62-4.070(3), F.A.C; Rule 62-210.200, F.A.C.(PTE)]
3. **Facility-Wide Methanol Emissions Cap.** The total maximum allowable facility wide Methanol emissions from all operations at the facility shall not exceed 8.86 tons in any 12-consecutive month period.  
*Permitting Note: Methanol is the only HAP authorized to be emitted by the facility.*  
[Application No. 0030005-003-AF; Rule 62-4.070(3), F.A.C; Rule 62-210.200, F.A.C.(PTE)]
4. **Facility-Wide Hazardous Air Pollutant (HAP) Emissions Caps.** The total maximum allowable facility wide HAP emissions from all operations at the facility shall be limited to less than 25.0 tons in any 12-consecutive month period for all HAPs totaled, and less than 10.0 tons per any 12-consecutive month period for any individual HAP other than Methanol.  
[Application No. 0030005-003-AF; Rule 62-4.070(3), F.A.C; Rule 62-210.200, F.A.C.(PTE)]
5. **Methanol Emissions Calculation.** To demonstrate compliance with Facility-wide Condition Nos. 2- 4 for methanol emissions, the permittee shall use the most recent methanol emission factor <sup>1,2,3</sup> as determined by the test specified in Section 4., Specific Condition No. 3, and the recorded gallons of each paint type produced as required in Section 4., Specific Condition No. 7., to determine the monthly methanol emissions from the facility.

$$\text{MEOH Emissions Rate (tons/month)} = [\text{E.F}_w \times \text{GP}_w] + [\text{E.F}_y \times \text{GP}_y] + [\text{E.F}_z \times \text{GP}_z] \times \text{ton/2000 lb}$$

Where:

E.F = Methanol emissions factor determined from testing, in lb/gallon per type of paint produced (i.e. white paint, yellow paint, black paint, etc.)

GP<sub>w</sub> = Monthly recorded production of white paint, in gallons

GP<sub>y</sub> = Monthly recorded production of yellow paint, in gallons

GP<sub>z</sub> = Monthly recorded production of a given type of paint, slow dry yellow, black, blue, etc., in gallons

The rolling, 12-month methanol emissions shall be determined from the monthly emissions record for the current month and the preceding eleven months and shall be expressed in tons per 12-month rolling period.

<sup>1</sup> Current Methanol Emission Factor for White Paint is 0.00079 lb/gal based on test conducted 10/8/13.

<sup>2</sup> Current Methanol Emission Factor for Yellow Paint is 0.00053 lb/gal based on test conducted 10/8/13.

<sup>3</sup> Current Methanol Emission Factor for Black Paint is 0.00039 lb/gal based on test conducted 10/8/13.

[Rule 62-4.070(3), F.A.C]

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### SECTION 3. FACILITY-WIDE CONDITIONS

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6. **Texanol Emissions Calculation.** To determine VOC emissions from paint produced using the raw material Texanol, the permittee shall use the most recent Texanol emission factor <sup>1,2,3</sup> as determined by the test specified in Section 4., Specific Condition No. 4, and the recorded gallons of each paint type produced as required in Section 4., Specific Condition No. 7., to determine the monthly Texanol emissions from the facility.

$$\text{TEXOH Emissions Rate (tons/month)} = [\text{E.F}_w \times \text{GP}_w] + [\text{E.F}_y \times \text{GP}_y] + [\text{E.F}_z \times \text{GP}_z] \times \text{ton/2000 lb}$$

Where:

E.F = Texanol emissions factor determined from testing, in lb/gallon per type of paint produced (i.e. white paint, yellow paint, black paint, etc.)

GP<sub>w</sub> = Monthly recorded production of white paint, in gallons

GP<sub>y</sub> = Monthly recorded production of yellow paint, in gallons

GP<sub>z</sub> = Monthly recorded production of a given type of paint, slow dry yellow, black, blue, etc., in gallons

The rolling, 12-month Texanol emissions shall be determined from the monthly emissions record for the current month and the preceding eleven months and shall be expressed in tons per 12-month rolling period.

<sup>1</sup> Current Texanol Emission Factor for White Paint is 0.0000046 lb/gal based on test conducted 10/8/13.

<sup>2</sup> Current Texanol Emission Factor for Yellow Paint is 0.0000051 lb/gal based on test conducted 10/8/13.

<sup>3</sup> Current Texanol Emission Factor for Black Paint is 0.0000095 lb/gal based on test conducted 10/8/13.

[Rule 62-4.070(3), F.A.C.]

7. **VOC Emissions Calculation.** To demonstrate compliance with Facility-wide Condition No. 2 for VOC emissions, the permittee shall total the methanol emissions determined from Facility-Wide Condition No. 5 and the Texanol Emissions determined from Facility-wide Condition No. 6.

[Rule 62-4.070, F.A.C.]

8. **Facility-Wide VOC, Methanol, HAP Emissions Cap- Records.** All supporting information, documentation, and records used to compute the facility-wide VOC and HAP emissions shall be maintained onsite at the facility in a permanent form suitable for Department inspection for at least three years from the date the data is recorded. These records and materials shall be made available to the Department or federal air pollution agency upon request.

[Rule 62-4.070, F.A.C.; Rule 62-4.160(14)(b), F.A.C.]

9. **Facility-Wide VOC, Methanol, HAP Emissions – Semi-Annual Reporting.** A report of the Facility-Wide VOC, Methanol, and Total HAPs emissions shall be submitted to the Northeast District Office on a semi-annual basis. All semi-annual reports shall be postmarked no later than the 45th day following the end of the reporting period defined below:

<u>Reporting Period</u>	<u>Report Due Date</u>
January - June	August 15
July - December	March 15

[Rule 62-4.070, F.A.C.]



### SECTION 3. FACILITY-WIDE CONDITIONS

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10. **Annual Operating Report.** The Permittee shall submit an annual report, as specified in Appendix C – Common Conditions of this permit, which summarizes the actual operating rates and emissions from this facility. The Annual Operating Report for Air Pollutant Emitting Facility (DEP form number 62-210.900(5)) shall be completed each year and shall be submitted to the Compliance Authority by April 1 of the following year.

[Rule 62-210.370(3), F.A.C.]

## SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

### Paint Manufacturing Facility (EU 001)

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	One Paint Manufacturing Facility with two mixers

#### ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. **Permitted Capacity:** The nominal production rate of water-based (latex) paints from this facility is 6,976,378 gallons in any consecutive twelve (12) month period.  
  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]
2. **Hours of Operation.** The hours of operation for this emissions unit are not restricted, i.e. 8760 hours per year of operation.  
  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

#### TEST METHODS AND PROCEDURES

3. **Emission Factor -Methanol Emissions.** The emission factor used to calculate methanol emissions from this facility shall be verified by conducting an emissions test using EPA Method 18 – Measurement of Gaseous Organic Compound Emissions by Gas Chromatography – 40 CFR Part 63, Appendix A on a 5 year basis, prior to permit renewal.

Methanol shall be sampled using a Silica Gel Tube as specified in the National Institute of Occupational Safety and Health #2000 procedure.

A separate emissions test shall be conducted for each type of paint manufactured by this facility, i.e. white, yellow, black, etc.<sup>1,2</sup>

As an alternative to EPA Method 18, EPA Method 308 – Procedure for Determination of Methanol Emission From Stationary Sources – 40 CFR Part 63, Appendix A may be used.

<sup>1</sup> *The Methanol Emission factor derived from the emission test results for manufactured black paint may be used as surrogate for red, blue and green paints instead of conducting separate emissions tests on each of these manufactured paints.*

<sup>2</sup> *For the purposes of this emission testing, permitted capacity shall be a single batch of a given paint, minimum of which shall be no less than 250 gallons.*

[Rule 62-297.401(18), F.A.C.; Rule 62-4.070, F.A.C.]

## SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

### Paint Manufacturing Facility (EU 001)

4. **Emission Factor –Texanol Emissions.** The emission factor used to calculate Texanol emissions (VOC) from this facility shall be verified by conducting an emissions test using EPA Method 18 – Measurement of Gaseous Organic Compound Emissions by Gas Chromatography – 40 CFR Part 63, Appendix A on a 5 year basis, prior to permit renewal.

Texanol ( 2,2,4- Trimethyl – 1,3-Pentanediol) shall be sampled using a Charcoal Tube as specified in the Occupational Safety and Health Administration (OSHA) 07 Reference Methodology.

A separate emissions test shall be conducted for each type of paint manufactured by this facility, i.e. white, yellow, black, etc.<sup>1,2</sup>

<sup>1</sup> *The Texanol Emission factor derived from the emission test results for manufactured black paint may be used as surrogate for red, blue and green paints instead of conducting separate emissions tests on each of these manufactured paints.*

<sup>2</sup> *For the purposes of this emission testing, permitted capacity shall be a single batch of a given paint, minimum of which shall be no less than 250 gallons.*

[Rule 62-297.401(18), F.A.C.; Rule 62-4.070, F.A.C.]

### NOTIFICATIONS, RECORDKEEPING AND REPORTING REQUIREMENTS

5. **Emissions Test Notification.** The permittee shall notify the Compliance Authority in writing in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rule 62-297.310(7), F.A.C.]

6. **Emissions Test Report Submittals.** Test result reports shall be prepared and submitted in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.

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

7. **Manufactured Paint Production Records.** To demonstrate compliance with Facility-wide Condition Nos. 2, 3, 4, and Section 4., Specific Condition No. 1, the permittee shall maintain a log at the facility of the following data at a minimum. The owner or operator shall maintain the following information:

- Monthly accumulative production of paint in gallons from this facility by paint type, i.e., white, yellow, slow dry yellow, blue, black, etc.
- Monthly accumulative production of paint in gallons from this facility.
- The total accumulative production of all paint in gallons from this facility per any 12-month consecutive period

[Application No. 0030005-003-AF, Rule 62-4.070(3), F.A.C., Rule 62-210.370(1), F.A.C.]