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639-06-04  
November 8, 2006

**Sandra F. Veazey**  
**Air Program Administrator**  
**Florida Department of Environmental Protection**  
**Northwest District**  
**160 Governmental Center**  
**Pensacola, Florida 32501-5794**

**Subject: Eastern Shipbuilding Group, Nelson Street Facility**  
**Bay County, Florida**  
**AIRS Facility ID: 0050074**  
**Fugitive Emissions Control Plan**

**Dear Ms. Veazey:**

I have reviewed your letter dated October 17, 2006, requesting additional information related to the Eastern Shipbuilding Group (ESG) Nelson Street facility air operating renewal permit application. Enclosed is a Fugitive Emissions Control Plan.

Regarding the control of fugitive emissions, three issues will be addressed:

- fugitive particulate matter emissions from open-air abrasive blasting and the associated painting,
- fugitive particulate matter emissions from vehicle traffic, and
- fugitive VOC emissions from paint containers.

The emissions from abrasive blasting appear to be the number one concern. Several options have been reviewed and permits issued to other shipyards in the state have been reviewed to determine permitted control measures applied to other facilities.

If you have questions, please contact me at your earliest convenience.

Sincerely,

**Max Lee, Ph.D., P.E.**  
**Koogler & Associates, Inc.**

**Enc:**  
**Cc: Mack Woods, ESG**

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# **FUGITIVE EMISSIONS** **CONTROL PLAN**

Eastern Shipbuilding Group  
2220 Nelson Street, Panama City, Florida

Bay County, Florida

AIRS Facility ID: 0050074

**Revision Date:**  
**November 8, 2006**

## **Fugitive particulate matter emissions from open-air abrasive blasting**

The Eastern Shipbuilding Group (ESG) conducts two types of abrasive blasting at the Nelson Street facility; spot blasting (following fabrication) and the blasting of marine vessels prior to repair and/or repainting.

Reasonable precautions included for the control of fugitive particulate matter resulting from abrasive blasting include:

- 1) Use of overlapping screens to prevent any gaps in screened areas.
- 2) Operator Training
- 3) Downward projection of blasting material to the extent possible
- 4) No new steel plate blasting
- 5) No reuse of used or spent blasting material
- 6) Use of coal slag/black beauty as the abrasive medium

These reasonable precautions are consistent with the reasonable precautions required of other shipyards operating under Title V permits elsewhere in the State of Florida.

In addition, a method 9 certified observer shall inspect each sandblasting activity, and shall maintain records of such inspections.

The blast media purchased is a special material that emits practically no dust when used. The blast media is stored in a bulk dispensing hopper and when required the blast media is dispensed into a portable container. This portable container is used to transport the blasting media to the work site. At the site the blasting media is poured into the blasting equipment reservoir. Before the blasting begins, climate conditions are considered and if there is a chance that particles may be transported off the property, screens constructed from a polymer filter fabric are erected around the construction blast area. These screens typically are either wrapped around the object to be blasted/painted or 20 to 30 feet high screens are erected surrounding the object to minimize off-site emissions. After the blasting is complete the painting begins.

A licensed testing laboratory is contracted to take samples of the expended blast media from repair projects (the blasting of painted surfaces) and test for contamination. If the results indicate contaminants above the acceptable limits, the media is gathered and placed into the contaminated waste dumpster for off-site disposal at an appropriately permitted disposal facility.

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## **Fugitive VOC emissions from paint containers**

The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems. All containers that are used for temporary and permanent storage of VOCs or organic solvents shall be covered where feasible to prevent vaporization of VOCs when not in use. All equipment, pipes, hoses, lids, fittings, etc., shall be operated in such a manner so as to minimize leaks and/or fugitive emissions and spills of volatile materials.

When the paints and solvents are received, they are stored in dedicated storage areas in the paint warehouse. When a project requires painting, the project manager submits a requisition for the painting supplies required for the project. Following submission of the requisition, the information from the requisition is input to the recordkeeping logs to track usage and emissions as required by the facility air permit. The paint is selected and mixed at the paint warehouse, transported to the construction site and poured into the spray paint reservoir. This reservoir is covered to minimize fugitive emissions.

A plastic film is placed on the ground below the work to be painted extending outward approximately 20 feet in all directions. This film is placed in order to catch any drops or spills. Spilled paint will dry on the plastic film and thus not spill onto the surrounding ground. If a screen has been placed around the area for blasting it remains throughout the painting process. If there was no need for a screen at the time of blasting operation and conditions have not changed the painting process takes place without a screen. If, however, conditions have changed by the time the painting operation is to begin, the operation is held up until the screens can be erected. Once erected, the screens remain in place until the blasting/painting operations are completed.

After completing the painting process, all painting expendables, clean-up rags, and the plastic film are gathered and placed into a dumpster dedicated to holding contaminated waste for pick-up. A licensed contaminated waste hauler is under contract with Eastern Shipbuilding to regularly pick-up the contaminated waste, transport and dispose of it at an appropriately permitted disposal facility.

The ESG personnel are instructed and recognize that paints and associated VOC containing compounds must be covered when not in use. It is noted that open-containers of paint at the site of a painting activity and in the process of being applied and is not a contradiction of permit conditions to reasonable precautions to assure compliance to State rule.

### **Fugitive particulate matter emissions from vehicle traffic**

Another activity that can contribute to fugitive particulate matter emissions at the Nelson Street facility is vehicle traffic. ESG has a water truck which is used for wetting unpaved roadways and unpaved travel areas within the facility. The company commits to utilizing the water truck to adequately wet unpaved roadways and travel areas as necessary to minimize fugitive particulate matter emissions. This precaution is likewise consistent with reasonable precautions prescribed for other facilities by FDEP.