



Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Phone: 904/807-3300 ♦ Fax: 904/448-4366

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE

Vac-Con, Inc.
969 Hall Park Drive
Green Cove Springs, Florida 32043

Authorized Representative:
Bob Graden, Plant Manager

Air Permit No. 0190031-007-AF
Permit Expires: June 4, 2014

Minor Source Air FESOP
Project Name: Renewal

PROJECT AND LOCATION

This permit authorizes Permit Renewal. The Vacuum Truck Surface Coating and Grit Blasting Operation (Standard Industrial Classification No. 7532). The facility is located in Clay County at 969 Hall Park Drive, Green Cove Springs, Clay County, Florida. The UTM coordinates are Zone 17, 435.0km East, and 3316.1 km North.

STATEMENT OF BASIS

This air pollution 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 conduct the proposed work 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. This project is not subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Executed in Jacksonville, Florida

6/4/2009

Christopher L. Kirts, P. E.
District Air Program Administrator

(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

This facility is an air pollutants emissions source due to the vacuum truck surface coating operation. It consists of three paint spray booths and an abrasive blast booth. The paint booths are equipped with filter media (low velocity mist eliminator), to capture the paint aerosol. The primary hazardous air pollutant (HAP) emissions from the surface coating operation include Toluene, Methyl Alcohol, Xylene and Ethyl Benzene. There are also non-HAP VOC emissions generated from the surface coating operation, which include Butyl Acetate, Methyl Amyl Ketone, MEK and VM&P Naphtha.

Existing Facility

E.U. ID No.	Emissions Point Description
001 – Vacuum Truck Surface Coating Operation	001 – Paint Booth No.1 002 – Paint Booth No.2 004 – Paint Booth No.4
004 – Plasma Metal Cutting Operation	001 – Torit Dust Collector
005 – Grit Blasting Operation	001 – Grit Booth Dust Collector

The “Torit” dust collector (Manufacturer: Donaldson Company, Inc., Model: DF-T2-16) is a cartridge dust collector that consists of 16 filters and pulse cleaning mechanism. The maximum volumetric flow is 7,000 cfm and the filter area is 3,040 ft².

The grit blast booth dust collector (Manufacturer: Pinnacle Central Company, Inc.) is also a cartridge filter that consists of 32 filters and pulse cleaning mechanism. The air to cloth ratio is 2:1 and the maximum volumetric flow is 16,000 cfm @ 6” standard pressure. The control system also includes 30 horse power fan and motor.

FACILITY REGULATORY CLASSIFICATION

This facility is classified as a synthetic non-Title V source due to federally enforceable limit established for the material usage and air pollutant emissions rates.

- 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 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Northeast District). The Northeast District's mailing address is 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District's Office.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Florida Department of Environmental Protection (Northeast District). The mailing address and phone number of the District Office is: 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590 and the Phone Number is: 904) 807-32300.
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 Conditions
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: 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. 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.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

8. Application for Non-Title V Permit: This permit authorizes operation of the permitted emissions units. A Non-Title V air operation permit renewal is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit renewal at least 60 days prior to expiration of this permit. To apply for a Non-Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

9. Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.
[Rule 62-210.700(5), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU001 Vacuum Truck Surface Coating Operation

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Vacuum Truck Surface Coating Operation: 001 -Paint Booth No.1; 002 - Paint Booth No.2 004 - Paint Booth No.4

PERFORMANCE RESTRICTIONS

A.1. Maximum Usage: The maximum Dupont Nason Lacquer Thinner usage shall be limited to 8540 gallons per year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. Hours of Operation: The hours of operation are not limited, i.e. 8760 hours/year.
[Rule 62-4.160(2), F.A.C.]

EMISSIONS STANDARDS

A.3. Maximum Allowable Emissions Rates: The permitted maximum allowable emissions rates for each pollutant are as follows:

Pollutant	Maximum Allowable Emissions Rate * Note	Rule
Any Individual HAP	9.5 tons/year	62-4.160(2), F.A.C. and emissions cap requested by applicant on April 6, 2004.
Total HAPs	23.0 tons/year	62-4.160(2), F.A.C. and emissions cap requested by applicant on April 6, 2004.

*Note: Limits established to escape Title V classification.

REPORTING AND RECORDKEEPING REQUIREMENTS

A.4. Record Keeping: Compliance shall be determined by recording the following data for each material used at the facility that contains HAPs and VOCs.

Materials Usage	
Usage = Monthly usage of each VOC & HAP containing materials	
Emissions Factor	
Density of Materials (Manufacturer specification's data shall be maintained)	<ul style="list-style-type: none">• % of VOC content (by weight)• % of HAP content (by weight)
Emissions	
<ul style="list-style-type: none">• Monthly Total VOCs emissions in tons• Monthly Individual HAP emissions in tons• Monthly Total HAPs emissions in tons	<ul style="list-style-type: none">• Total cumulative Total VOCs emissions for 12-consecutive month• Total cumulative Individual HAP emissions for 12-consecutive month• Total cumulative Total HAPs emissions for 12-consecutive month

[Rule 62-210.370 (1), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU001 Vacuum Truck Surface Coating Operation

A.5. Record Retention: The owner or operator shall retain a copy of all records used to compute emissions for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370 (2)(h), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

B. EU004 Plasma Metal Cutting Operation & EU005 Grit Blasting Operation

This section of the permit addresses the following emissions unit.

<u>E.U. ID No.</u>	<u>Emissions Point Description</u>
004 – Plasma Metal Cutting Operation	001 – Torit Dust Collector
005 – Grit Blasting Operation	001 – Grit Booth Dust Collector

PERFORMANCE RESTRICTIONS

B.1. Hours of Operation: The hours of operation are not limited, i.e. 8760 hours/year.
[Rule 62-4.160(2), F.A.C.]

WORK PRACTICE STANDARDS

B.2. Control Unit. The emissions from the metal cutting and grit blasting operations shall be controlled by the permitted baghouses as stated below.

<u>Emissions Unit</u>	<u>Control Unit</u>
004 – Plasma Metal Cutting Operation	Torit Dust Collector (Manufacturer: Donaldson Company, Inc., Model: DF-T2-16)
005 – Grit Blasting Operation	Grit Booth Dust Collector (Manufacturer: Pinnacle Central Company, Inc.)

The owner or operator shall operate the baghouse during normal operation (whenever the dust is generated from the operation). If there is a malfunction on the control unit, the owner or operator shall shut down the operation and the baghouse fan immediately to minimize excess emissions.

{Permitting Note: These EUs are only subject to the 20% facility-wide VE limit. No testing is required.}

[Rule 62-210.700(1) and 62-210.650, F.A.C.]

RECORDKEEPING

B.3. Baghouse Malfunction/Maintenance Record. The owner or operator shall maintain the malfunction and maintenance records of the baghouses. The record shall be kept on site for at least 3 years, and shall include the following information but not limited to:

- Date and type of malfunctions occurred.
- Duration of the malfunction and correction action taken.
- Maintenance conducted on the baghouses.

[Rule 62-4.070 (2), and 62-4.160, F.A.C.]