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ADMINISTRATIVE OFFICES, LEGAL &
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960
FAX (813) 272-5157

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

EXECUTIVE DIRECTOR

RICHARD D. GARRITY, Ph.D.

M E M O R A N D U M

DATE: March 21, 2001

TO: Richard D. Garrity, Ph.D.

FROM: Rob Kalch ^{rsk} **THRU:** Alice H. Harman, P.E. 

SUBJECT: Construction Permit - International Ship Repair and
Marine Services, Inc.
Permit No. 0570021-008-AC

Attached is Permit No. 0570021-008-AC for an increase in the permitted solvent and interior coating usage and an decrease in the exterior coating usage at the above referenced facility. Exterior coatings, which are RACT exempt, are limited to 70,000 gallons per year and an annual average VOC content of 3.5 lbs VOC per gallon as applied. The interior coatings, which are subject to RACT, are limited to 20,000 gallons per year and a VOC content for each gallon of coating applied of 3.5 lbs VOC per gallon, as applied. HAP emissions, which were previously not quantified, have been calculated based on historical data which indicates that 82 percent of the VOC emissions are HAP emissions. The facility is a minor facility with respect to PSD (<250 tpy), but is major with respect to the Title V permitting program (>100 tpy). The facility is a Title V source of air pollution for VOC, HAPs, and PM.

This construction permit does not modify emissions unit No. 1, which is the blasting activities. The facility's Title V permit (Permit No. 0570021-004-AV) will be revised to incorporate the changes authorized by this construction permit once the modification is complete and a Final Air Construction Permit has been issued.

Based on our review, we recommend issuance of the attached construction permit.

rsk:0570021-008-AC

TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

International Ship Repair and Marine Services, Inc.

Hillsborough County

Construction Permit

Application Number

0570021-008-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

March 21, 2001

I. Project Description

A. Applicant:

International Ship Repair and Marine Services, Inc.
Tad Humpreys
President
1616 Penny Street
Tampa, FL 33605

B. Engineer:

Omana S. Korah, P.E.
Environmental Technologies Group, Inc.
154 North Woodcreek Drive
Safety Harbor, FL 34695

P.E. No.: 51996

C. Project and Location:

The applicant has requested an increase in the annual usage for interior (RACT) coatings (17,754 gal/yr), a decrease in exterior (Non-RACT) coatings (2,571 gal/yr), and an increase in the solvent usage (4,265 gal/yr) with a corresponding increase in VOC and HAP emissions for the facility. VOC and HAP emissions are minor with respect to PSD, but major with respect to the Title V permitting program. The applicant has accepted a limit of 3.5 lbs VOC/gallon of coating, as applied, on an annual average basis for exterior (Non-RACT) coatings. The RACT limit of 3.5 lbs VOC/gallon, as applied, will apply for all interior (RACT) coatings in accordance with Rule 62-296.513(2)(a)(2) and (3), F.A.C. Blasting operations (EU No. 1) are unchanged by this permit.

The project has been assigned the following NEDS Source Classification Code Nos.:

4-02-023-01 Prime Coating Operation
4-02-023-06 Topcoat Operation

The Standard Industrial Code for the project is No. 3731, Ship Building and Repair. The project is located at 1616 Penny Street, Tampa, Hillsborough County, FL 33605. UTM Coordinates of the location are 17-358.3 E and 3092.75 N.

D. Process and Controls:

Ships may be brought in to berths (Berth 200 and 206) to have the work completed. The surfaces of the ships are prepared, primed, and coated on site. The facility uses floating dry docks to enable personnel to complete the work. The surface is prepared (stripped) through the use of pneumatic grit-blasting equipment. VOC/HAP emissions from painting operations are controlled through the use of VOC/HAP content limits and annual coating usage limits. VOC/HAP emissions from solvents and cleaners are controlled through work practices. Particulate emissions are controlled through the use of tarps, screens, enclosures, and work practices.

E. Application Information:

Received on: March 6, 2001

Information Requested: N/A

Application Complete: March 6, 2001

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since the facility is minor by state definition.

This project is subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C., since emissions from the facility are minor with respect to the PSD threshold(s) and a permit is required for the facility.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the facility is a source of VOC emissions and particulate matter emissions and is a potential source of odor and particulate matter.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.417, Specific Emission Limiting and Performance Standards, F.A.C., since there is not an applicable category for this project.

This project is subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology, F.A.C., since the facility is subject to VOC-RACT for interior coatings in accordance with Rule 62-296.513, F.A.C.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology, F.A.C., since the facility is not a source of lead.

This project is subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology, F.A.C., since it is located within the Hillsborough County Maintenance Area for the pollutant particulate matter.

This project is subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since the facility is subject to 40 CFR 63, Subpart II.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

III. Summary of Emissions

The facility wide emissions, including the emissions from this modification, are as follows:

<u>Regulated Pollutants</u>	Estimated Actual Emissions lbs./hr.	TPY	Allowable Emissions lbs./hr.	TPY
VOC	*46.7	204.6	NA	204.6
HAP	37.0	162.0	NA	162.0
PM	33.6	147.0	NA	147.0
NO _x	**20.3	**88.9	NA	NA
CO	4.4	19.2	NA	NA
SO ₂	1.3	5.8	NA	NA

* The facility's estimated actual emissions, on an lbs/hr basis, have been back calculated from the maximum annual usages and the VOC limits contained in this permit for interior and exterior coatings. The hourly VOC emissions have been back calculated because the VOC limit for interior coatings is for each individual gallon of coating applied, but the VOC limit for exterior coatings is based on an annual basis.

** NOx emissions are limited through fuel restrictions.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).