

COMMISSION

Kevin Beckner Lesley "Les" Miller, Jr.
Victor D. Crist Sandra L. Murman
Ken Hagan Stacy White
Al Higginbotham



EXECUTIVE DIRECTOR
Richard D. Garrity, Ph.D.

DIVISION DIRECTORS

Legal & Admin. Richard Tschantz, Esq.
Air Management Jerry Campbell, P.E.
Waste Management Hooshang Boostani, P.E.
Water Management Sam Elrabi, P.E.
Wetlands Management Scott Emery, Ph.D.

Mr. Dave Sessums
President
International Ship Repair and Marine Services, Inc. (ISR)
1616 Penny Street
Tampa, FL 33605

Re: 0570021-015-AC
 Air Construction Permit
 Additional Blasting Media- Copper Slag

Dear Mr. Sessums:

On May 18, 2015, you submitted an application for an air construction permit to authorize the use of copper slag as an abrasive blasting material at ISR. In addition, this permit is being issued concurrently with the Title V Renewal Permit No. 0570021-016-AV. Permit No. 0570021-016-AV includes the combined public notice for both permits. This facility is located in Hillsborough County at 1616 Penny Street, Tampa, Florida.

After review of the application, the following documents have been prepared: the Technical Evaluation and Preliminary Determination; the Draft Permit; the Written Notice of Intent to Issue Air Permit; and the combined Public Notice of Intent to Issue Air Permit. The combined Public Notice of Intent to Issue Air Permit is the actual notice that you must publish in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact Diana M. Lee, P.E. at 813-627-2600 x1276, or by e-mail at lee@epchc.org.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

Enclosures

RDG/KRZ/krz

TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

International Ship Repair & Marine Services, Inc. (ISR)

Hillsborough County

Construction Permit

Application Number

0570021-015-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

June 24, 2015

I. Project Description

A. Applicant:

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

B. Engineer:

Omana Taylor, P.E.
P.E. No.: 51996
Environmental Technologies Group, Inc.
14948 Sunrise Drive, NE
Bainbridge Island, WA 98110

C. Project and Location:

This permit authorizes the use of copper slag as an abrasive blasting material at ISR. In addition, this permit is being issued concurrently with Title V Renewal Permit No. 0570021-016-AV. The project has been assigned Source Classification Code (SCC) No. 3-09-002-03, Abrasive Blasting of Metal Parts, Slag Abrasive.

The facility has been assigned SIC Industry No. 3731, Ship and Boat Building and Repair. The project is located at 1616 Penny Street, Tampa, FL 33605. UTM Coordinates of the location are 17-358.03 E and 3092.75 N.

D. Process and Controls:

ISR is a ship repair and maintenance facility whose operations involve the blasting and coating of marine vessels. In accordance with the facility's existing Permit No. 0570021-014-AV, ISR can only use coal slag or steel shot for abrasive blasting material, unless prior approval is received from the Environmental Protection Commission of Hillsborough County to use another material.

On February 12, 2015, ISR submitted a request for the use of approximately 600 tons of copper slag as a blasting media for a ship blasting project. On March 3, 2015, a one-time exemption was issued to allow ISR to use copper slag for a ship blasting project. According to the copper slag MSDS, the EG-copper slag that will be supplied by Opta Minerals, Inc., contains approximately 57% iron oxide, 30% silicone dioxide, 5% aluminum oxide, 4% calcium oxide, 3% zinc, 1% magnesium oxide, and < 1% copper. This same type of slag is already authorized to be used at Gulf Marine Repair's facility in the Port.

The exemption required ISR to conduct visible emission test during the blasting operation while using copper slag, and it also required that ISR submit an air construction permit application for the

permanent use of copper slag as a blasting material. On March 24, 2015, EPC staff audited the VE test while medium grade copper slag was being used for the grit blasting operation. The VE test demonstrated compliance with the 20% opacity limit, as determined by the Air Compliance Section.

Particulate Matter (PM) emissions from exterior blasting are minimized with a limit on the amount of abrasive grit used in any 12 month period, the use of tarps/barriers that surround the blasting area, and other reasonable precautions. When blasting an internal section of a ship, the displaced air is passed through a filter device or a tarp enclosure that covers the exhaust points from the internal blasting prior to exhausting to the atmosphere. PM emissions from storage silo loading are limited by passing the displaced air through fabric filters (or baghouses). Compressor emissions are controlled by the use of diesel fuel only and a limitation on the amount of diesel fuel used in any 12 month period.

ISR is a major source of PM, VOC and HAP emissions. During this permit review, EPC staff updated the potential to emit (PTE) for PM emissions to 111.4 TPY using a 70% control efficiency to be consistent with other shipyard since ISR uses tarps or barriers with at least 95% shade factor. Previously, the PTE for PM was 146.5 TPY using 60% control efficiency. Therefore, the PTE for the facility is 111.4 TPY, 204.6 TPY, and 162.1 TPY, for PM, VOC and HAP emissions, accordingly.

The facility is subject to 40 CFR 63, Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating). In addition, ISR is subject to PM-RACT because the facility-wide PM PTE is greater than 5 lbs/hr and 15 TPY. However, the abrasive blasting of ship exteriors is not subject to PM-RACT, since it is not reasonable to enclose. The abrasive blasting of miscellaneous metal parts in the blasting booths is subject to the 0.03 gr/dscf particulate matter limit and 5% opacity limit pursuant to Rule 62-296.712(2), F.A.C. The silo loading is subject to the 5% opacity standard of Chapter 1-3.52, Paragraph 2, Rules of the EPC. The diesel compressor is subject to the 20% opacity standard of Rule 62-296.320, F.A.C. Furthermore, the facility is subject to VOC-RACT Rule 62-296.513, F.A.C., for the surface coating operation of ship interiors and miscellaneous parts, excluding the coating of the exterior of an assembled ship.

E. Application Information:

Received on: May 18, 2015

Information Requested: N/A

Application Complete: May 18, 2015

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 subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C., since the project is not exempt from the permit requirements in Rule 62-210.300, F.A.C.

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 not a PSD source and this project does not result in a major modification.

This project is subject to the requirements of Rule 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C., since the facility is a Title V source by state definition.

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

This project is not subject to the requirements of Rule 62-296.401 through 62-296.470, Specific Emission Limiting and Performance Standards, F.A.C., since there is not an applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.500, Volatile Organic Compounds and Nitrogen Oxide Reasonably Available Control Technology, F.A.C., since there is not an applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.600, Lead Reasonably Available Control Technology, F.A.C., since there is not an applicable source specific category in this rule.

The project is subject to the requirements of Rule 62-296.700, Particulate Matter Reasonably Available Control Technology, F.A.C. since the facility is located in a PM maintenance area and the facility wide PM emissions are greater than 15 TPY and 5 lbs/hr.

This project is not subject to the requirements of Rule 62-204.800 Standards of Performance for New Stationary Sources, Federal Regulations Adopted by Reference, F.A.C., since there is not an applicable source specific category in this rule.

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

Emission Unit (EU) No.	EU Description	Regulated Pollutant	Potential Emissions (tons/yr)	Actual Emissions (tons/yr)	Allowable Emissions
001	Exterior Abrasive Blasting and Diesel Compressors	PM	111.4 ⁽¹⁾	13.6	20% opacity
004	Interior Blasting and Miscellaneous Metal Blasting	PM	(1)		5% opacity
005	Grit Silos	PM	(1)		5% opacity

- For EU 001, the potential PM emissions are based on an emission factor of 0.01 lb PM/lb of material from Table 2-2, STAPPA/ALAPCO Permitting Handbook, the usage of 35,055 tons of abrasive material per year, which is worst case, and a control efficiency of 70% for the tarps/barriers that surround the blasting area.
- ⁽¹⁾ For EU 004 and EU 005, the potential PM emissions are included in EU 001 since the grit usages in the booths and silos are part of the existing permitted throughput limits, and the worst-case scenario that all blasting occurs on the ships outside the booths was used,
- Actual emissions are based on the average of 2013 and 2014 AOR data.

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 for construction of the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

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

Project No. 0570021-015-AC
Air Construction Permit
Hillsborough County, Florida

Responsible Official:
Dave Sessums

Additional Blasting Media – Cooper Slag

Facility Location: ISR operates a ship repair and maintenance facility, which is located in Hillsborough County at 1616 Penny Street, Tampa, FL, 33605.

Project: This project authorizes the use of copper slag as an abrasive blasting material at ISR. In addition, this permit is being issued concurrently with Title V Renewal Permit No. 0570021-016-AV.

Permitting Authority: Applications for the air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Environmental Protection Commission of Hillsborough County. The Permitting Authority's physical address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's mailing address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's telephone number is 813/627-2600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E. for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air construction and Title V renewal permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact

air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: This permit is being issued concurrently with the Title V Renewal Permit No. 0570021-016-AV. Permit No. 0570021-016-AV includes the combined public notice for both permits. Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permits for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permits, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

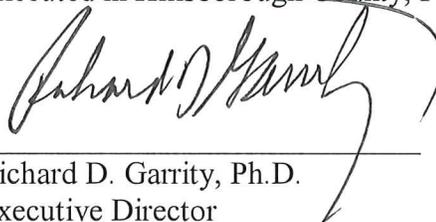
Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this written notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602, before the deadline. 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 (in a proceeding initiated by another party) 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 Permitting Authority'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; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile 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 when and how each petitioner received notice of the agency action or proposed decision; (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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority's final action may be different from the position taken by it in this written notice of Intent to Issue Air Permit. 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.

Executed in Hillsborough County, Florida.



Richard D. Garrity, Ph.D.
Executive Director

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested or by certified mail before the close of business on the date indicated below to the persons listed below.

Dave Sessums – International Ship Repair and Marine Services, Inc.
Omana Taylor, P.E. - ETG, Inc. (via e-mail)

Clerk Stamp

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



(Clerk)



(Date)

COMMISSION

Kevin Beckner	Lesley "Les" Miller, Jr.
Victor D. Crist	Sandra L. Murman
Ken Hagan	Stacy White
Al Higginbotham	



EXECUTIVE DIRECTOR
Richard D. Garrity, Ph.D.

DIVISION DIRECTORS

Legal & Admin.	Richard Tschantz, Esq.
Air Management	Jerry Campbell, P.E.
Waste Management	Hooshang Boostani, P.E.
Water Management	Sam Elrabi, P.E.
Wetlands Management	Scott Emery, Ph.D.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Dave Sessums
President
International Ship Repair and Marine Services, Inc. (ISR)
1616 Penny Street
Tampa, FL 33605

Dear Mr. Sessums:

Enclosed is Permit No. 0570021-015-AC to authorize the use of copper slag as an abrasive blasting material at ISR. This permit is issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Dr, Tampa, FL 33619; 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 from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

DRAFT

Richard D. Garrity, Ph.D.
Executive Director

RDG/KRZ/krz

cc: Omana Taylor, P.E. - ETG, Inc. (via email)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

Clerk Stamp
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

DRAFT

Clerk

Date

COMMISSION

Kevin Beckner	Lesley "Les" Miller, Jr.
Victor D. Crist	Sandra L. Murman
Ken Hagan	Stacy White
Al Higginbotham	



EXECUTIVE DIRECTOR
Richard D. Garrity, Ph.D.

DIVISION DIRECTORS

Legal & Admin.	Richard Tschantz, Esq.
Air Management	Jerry Campbell, P.E.
Waste Management	Hooshang Boostani, P.E.
Water Management	Sam Elrabi, P.E.
Wetlands Management	Scott Emery, Ph.D.

DRAFT

PERMITTEE:

International Ship Repair
and Marine Services, Inc. (ISR)
1616 Penny Street
Tampa, FL 33619
Handling

PERMIT/CERTIFICATION

Permit No.: 0570021-015-AC
County: Hillsborough
Expiration Date: December 31, 2015
Project: Additional Blasting Media - Copper Slag

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

This permit authorizes the use of copper slag as an abrasive blasting material. In addition, this permit is being issued concurrently with the Title V Renewal Permit No. 0570021-016-AV. International Ship Repair & Marine Services, Inc., (ISR) performs operations that include the blasting and coating of marine vessels. The abrasive material used for blasting is stored on-site in storage silos that are pneumatically loaded. The blasting equipment includes blasting pots and a maximum of 16 blasting nozzles. Both external and internal blasting of ships occurs at the facility. Compressed air for propelling the abrasive grit is provided by up to eight diesel compressors. After blasting, the surfaces are sprayed with a series of marine coatings which may contain one or more volatile organic compounds (VOCs) and/or hazardous air pollutants (HAPs). VOC and HAP emissions are controlled through various coating content restrictions and limits on usage in any 12-month period.

Particulate Matter (PM) emissions from exterior blasting are minimized with a limit on the amount of abrasive grit used in any 12 month period, the use of tarps/barriers that surround the blasting area, and other reasonable precautions. When blasting an internal section of a ship, the displaced air is passed through a filter device or a tarp enclosure that covers the exhaust points from the internal blasting prior to exhausting to the atmosphere. PM emissions from storage silo loading are limited by passing the displaced air through fabric filters (or baghouses). Compressor emissions are controlled by the use of diesel fuel only and a limitation on the amount of diesel fuel used in any 12 month period.

ISR's operations include the main yard at 1616 Penny Street in Tampa, Metro Port (Berth 263, 264 and 265) and Berths 200 and 206 at Hooker's Point. All of the maintenance locations are considered part of the same Title V source and, as a result, this permit reflects the emissions and usage limits from all of the permitted locations combined.

An agency with values of environmental stewardship, fairness, and cooperation

Roger P. Stewart Center

3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - www.epchc.org

An Affirmative Action / Equal Opportunity Employer

DRAFT

ISR is a major source of PM, VOC and HAP emissions. The facility is subject to 40 CFR 63, Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating). ISR is not subject to 40 CFR 63, Subpart M, for the surface coating of miscellaneous metal parts and products since the facility is already subject to the Subpart II pursuant to 40 CFR 63.3881(c)(12).

In addition, ISR is subject to PM-RACT because the facility-wide PM PTE is greater than 5 lbs/hr and 15 TPY. However, the abrasive blasting of ship exteriors is not subject to PM-RACT, since it is not reasonable to enclose. The abrasive blasting of miscellaneous metal parts in the blasting booths is subject to the 0.03 gr/dscf particulate matter limit and 5% opacity limit pursuant to Rule 62-296.712(2), F.A.C. The silo loading is subject to the 5% opacity standard of Chapter 1-3.52, Paragraph 2, Rules of the EPC. The diesel compressor is subject to the 20% opacity standard of Rule 62-296.320, F.A.C. Furthermore, the facility is subject to VOC-RACT Rule 62-296.513, F.A.C., for the surface coating operation of ship interiors and miscellaneous parts, excluding the coating of the exterior of an assembled ship.

Location: 1616 Penny Street, Tampa, FL 33605

UTM: 17 - 360.80 East and 3087.31 North

Facility ID No.: 0570021

Emission Unit No.:

001 – Exterior Abrasive Blasting and Diesel Compressors

004 – Interior Blasting and Miscellaneous Metal Blasting

005 – Grit Silos

References Permit Nos.: 0570021-014-AV

Replaces Permit No.: N/A

DRAFT

PERMITTEE:
International Ship Repair and Repair Services

PERMIT/CERTIFICATION NO.: 0570021-015-AC
PROJECT: New Blasting Media - Copper Slag

SPECIFIC CONDITIONS:

DRAFT

The following conditions apply facility-wide to all emission units and activities:

A.1. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C. and EPCHC Rule 1-3.22]

A.2. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

A.3. In order to limit the potential to emit (PTE), the following limitations and restrictions apply to International Ship Repair & Marine Services, Inc. (ISR):
[Rule 62-4.070(3), F.A.C.; Permit Nos. 0570021-008/014-AC/AV and Construction Permit Application received on May 18, 2015]

- A) The maximum volatile organic compound (VOC) emissions (coating operations and compressors for blasting) shall not exceed 205 tons per twelve consecutive month period;
- B) Total HAP emissions (coating operations and compressors for blasting) shall not exceed 162 tons per any 12 consecutive month period.

A.4. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. 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 deemed necessary and ordered by the Department.

- (1) Maintaining covers, lids, etc., on all containers when they are not being handled, tapped, etc.
 - (2) Where possible and practical, procuring/fabricating a tightly fitting cover for any open trough, basin, etc., of VOC so that it can be covered when not in use.
 - (3) Attending to all spills/waste as soon as practical but no later than one hour after the event.
 - (4) Using only airless spray applicators unless a request for use of another technology is submitted in writing and approved by the Environmental Protection Commissions of Hillsborough County.
 - (5) Using high solids coatings whenever they are available and whenever they meet customer specifications.
 - (6) Using tarps or barriers with at least 95% shade factor at all times when painting any vessel or part thereof. The tarps or barriers shall surround and extend above the painting area, with complete enclosure at all times to contain all paint overspray. Only the immediate area around the location of active painting is required to be enclosed, as long as all of the painting is contained.
 - (7) Enclosing, covering or filtering drains or openings in the dry dock during painting.
- [Rule 62-296.320(1)(a), F.A.C., and Permit No. 0570021-008-AC]

DRAFT

A.5. Emissions of Unconfined Particulate Matter. The permittee shall allow no person to cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including, but not limited to, vehicular movement; transportation of materials; construction; alteration, demolition or wrecking or industrial related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent

PERMITTEE:
International Ship Repair and Repair Services

PERMIT/CERTIFICATION NO.: 0570021-015-AC
PROJECT: New Blasting Media - Copper Slag

SPECIFIC CONDITIONS:

DRAFT

such emissions. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements;

[Appendix TV, Title V Conditions]:

- A) Using only coal slag, steel shot or copper slag for abrasive blasting material unless prior approval is received from the Environmental Protection Commission of Hillsborough County to use another material.
- B) Using no spent abrasive material, except for steel shot used within a closed blasting system.
- C) Using wet blasting techniques if desired. In the event that wet blasting is used, the permittee shall obtain the appropriate water pollution permits in accordance with Rule 62-4.240, F.A.C., prior to commencing wet blasting.
- D) Using tarps or barriers with at least 95% shade factor at all times when blasting any vessel or part thereof. The tarps or barriers shall surround and extend above the blasting surface, with complete enclosure at all times to contain the dust and limit the opacity to below 20% and to keep the dust from entering the waters of Tampa Bay. When wet blasting, the extent of the enclosure may be less.
- E) Conducting all blasting from the top of the ship down and blasting with the nozzle directed downward in order to control airborne emissions except when blasting beneath the vessel or on a small part which makes it physically impractical.
- F) Requiring that all blasting operators be trained on procedures which minimize airborne emissions of blasting materials. Records of training (when it was offered and who attended) shall be maintained and be made available for inspectors of the Environmental Protection Commission of Hillsborough County upon request.
- G) Using only manual sweeping and vacuum systems to clean-up spent blasting materials. The permittee shall clean-up spent blasting materials and other waste prior to submerging the dry dock. No blowers are permitted.
- H) Equipping all pneumatically loaded grit storage silos with a filtration device on the exhaust opening. The device must retain at least 90% of 25 micron or larger particulate matter.
- I) Recycling or disposing of all solid waste in a permitted Class I or II landfill or other facility approved by the Environmental Protection Commission of Hillsborough County. Receipt of disposal shall be maintained on site for a period of two years and made available to inspectors upon request. [Rule 62-701, F.A.C.]
- J) Enclosing, covering or filtering drains or openings in the dry dock during blasting.

[Rule 62-296.320(4)(c)2., F.A.C., Permit No. 0570021-008-AC and Construction Permit Application received on May 18, 2015]

A.6. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable requirement or permit condition is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. For the purpose of confirming compliance with the emission limitations in this permit, the EPC may require the use of EPA Method 9, EPA Method 24, or other approved methods, as deemed necessary. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

A.7. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]

A.8. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit"

DRAFT

PERMITTEE:
International Ship Repair and Repair Services

PERMIT/CERTIFICATION NO.: 0570021-015-AC
PROJECT: New Blasting Media - Copper Slag

SPECIFIC CONDITIONS:

DRAFT

(DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

A.9. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

A.10. The permittee shall notify the Environmental Protection Commission of Hillsborough County in writing at least 15 days prior to the date or as soon as practicable that blasting and/or painting is scheduled to commence on each vessel of the dates and times that the blasting and painting are scheduled to be performed on that vessel. [Rule 62-4.070(3), F.A.C.]

A.11. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment* or major component of such equipment.
- B) Installation or addition of any equipment* which is a source of air pollution.

*Not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit.

A.12. In order to provide reasonable assurance of compliance with the visible emissions standards in Specific Condition No. B.5.B), the conditions detailed in Appendix CP-2, Visible Emissions Compliance Plan, for the blasting booth located at Berth 200 shall be implemented and completed according to the Compliance Plan. [Rule, 62-4.070(3), F.A.C., and Chapter 1-1.07, Paragraph 2, Rules of the EPC]

A.13. In order to provide reasonable assurance that the pollution control equipment is operated and maintained adequately, the permittee shall comply with the Operation and Maintenance Plan, Appendix O&M, for the blasting booth dust collector located in the main yard. In the event of a deviation from the monitoring parameters, the facility shall take corrective actions to remedy the situation. Notify the Environmental Protection Commission of Hillsborough County within 24 hours of the problem. The emission unit shall not be operated until the problem is corrected. A written explanation and the corrective actions implemented shall be submitted. Records of inspections, maintenance, and performance parameters shall be retained for a minimum of five years and shall be made available to the Environmental Protection Commission of Hillsborough County upon request. [Rules 62-296.700(6)(e) and 62-4.070(3), F.A.C.]

DRAFT

PERMITTEE:
International Ship Repair and Repair Services

PERMIT/CERTIFICATION NO.: 0570021-015-AC
PROJECT: New Blasting Media - Copper Slag

SPECIFIC CONDITIONS:

Subsection B. This section addresses the following emissions unit(s).

DRAFT

E.U. ID

<u>No.</u>	<u>Brief Description</u>
001	Exterior Abrasive Blasting and Diesel Compressors
004	Interior Blasting and Miscellaneous Metal Blasting
005	Grit Silos

B.1. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.2. The following operating and usage restrictions shall apply:
[Rules 62-4.070(3), 62-212.300(1)(d), F.A.C. and AC Permit No. 0570021-008-AC]

- A) No more than 35,055 tons of abrasive grit shall be used in any 12 month period.
- B) No more than 294,366 gallons diesel fuel shall be used in any 12 month period. Sulfur content of the fuel shall not exceed 0.05 percent by weight.
- C) All dust laden air which is displaced in the silo loading process shall be filtered before being discharged to the ambient air.
- D) No more than 16 blasting nozzles shall be in use at any given time.
- E) All miscellaneous metal parts to be blasted separate from the dry docks shall be placed within the blasting/coating booth whenever practical.
- F) Only diesel fuel, no used or waste oils, shall be burned in the diesel compressors.
- G) The maximum loading pressure for the grit blasting storage silo shall not exceed 15 psia.

B.3. The permittee shall not cause, permit, or allow emissions of particulate matter in excess of 0.03 gr/dscf from the baghouse that controls the blasting operation in the blasting/coating booth.
[Rule 62-4.070(3), F.A.C. and Permit No. 0570021-013-AC]

B.4. In order to limit the potential to emit (PTE), the following limitations and restrictions shall apply: [Rules 62-4.070(3), 62-296.320(4)(b)1. and 62-296.712(2), F.A.C., Chapter 1-3.52, Rules of the EPC, Permit Nos. 0570021-013/014-AC/AV and Appendix CP-2]

- A) Visible emissions from the grit blasting activities (includes external ship blasting operations, internal ship blasting and the diesel air compressors) shall not be equal to or greater than 20% opacity;
- B) Visible emissions from the abrasive grit storage silos and abrasive blasting of miscellaneous metal parts in the blasting/coating booth or the blasting/coating containment area, shall not be greater than 5% opacity.

B.5. Periodic Monitoring. To assure compliance with Specific Condition B.4., the permittee shall conduct 12 minute visible emission (VE) observations using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The testing shall be conducted as follows:

<u>Activity/Unit</u>	<u>Frequency</u>	<u>Condition</u>
External Blasting	Once per day ^{1,2}	At point of maximum opacity leaving the dry dock/tarp enclosure

DRAFT

PERMITTEE:
International Ship Repair and Repair Services

PERMIT/CERTIFICATION NO.: 0570021-015-AC
PROJECT: New Blasting Media - Copper Slag

SPECIFIC CONDITIONS:

Grit Silos	One silo, per ship ²	During grit loading
Diesel Compressors	One compressor, per day ^{2,3}	Compressor with highest visible emissions

DRAFT

1 - If multiple ships are being blasted on the same day, the 12-minute VE observation should be performed on the ship with the highest visible emission observed during a comprehensive scan of the area. Records of the total number of nozzles in operation across the facility shall be recorded with each observation.

2 - Any observed malfunctions from the silos, diesel compressors or blasting activities shall initiate immediate corrective action to maintain visible emissions below the applicable opacity standard. This includes contracted silos brought in for specific blasting activities.

3 - If multiple ships are being blasted on the same day, the VE observation should be performed on the compressor with the highest visible emission observed during a review of all compressors operating. If wet-blasting of parts is occurring and the diesel compressors are not being utilized, then no 12-minute VE observation is required; however, records indicating this type of blasting and the times in operation must be maintained.

Any required testing that occurs only during the nighttime hours without the opportunity to perform the appropriate visible emission test shall be excluded from testing; however, detailed records shall be maintained indicating the affected vessels, type of activity and documentation of times that the activity was occurring. These records shall be maintained with the test records above and be summarized as stated in Specific Condition B.12.

[Rules 62-4.070(3) and 62-213.440(b)1.b., F.A.C.]

B.6. When internal blasting is being performed with displaced air being vented to a portable control device, a visible emissions check shall be performed during the blasting operation. If any emissions are observed, the permittee shall immediately conduct a 12-minute visible emission observation using EPA Method 9 contained in 40 CFR 60, Appendix A. If any emissions over 20% opacity are observed, the permittee shall initiate immediate corrective action to eliminate excessive visible emissions. If internal blasting occurs entirely during nighttime hours and VE observations are not practical, detailed records shall be maintained to document the affected vessel and the time of the activity. Records of the VE checks, VE observations, formal VE tests, nighttime internal blasting and any maintenance performed shall be maintained in conjunction with Specific Conditions B.5 and B.11. [Rule 62-4.070(3), F.A.C.]

B.7. During each calendar year (January 1st - December 31st), unless otherwise specified by rule, order, or permit, the permittee shall conduct visible emissions (VE) tests to demonstrate compliance with Specific Condition B.4. The tests shall include testing at the point of highest observed opacity for external blasting, internal blasting, silo loading, miscellaneous metal parts blasting and diesel compressor operations. If a required testing point is not operated during the fiscal year, a test is not required for that affected source; however, a VE test is required at the next instance of that source's operation. [Rule 62-297.310(7)(a)4., F.A.C.]

B.8. Compliance with Specific Condition B.4. shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. Specific observation shall be conducted during the dry blasting of the exterior of a marine vessel. All EPA Method 9 compliance testing observation periods shall be at least thirty (30) minutes in duration, unless specifically defined by another condition within Section B of this permit. The observation points for testing the blasting operation shall be as follows:

- A) Emission points of maximum opacity leaving the dry dock enclosure, tarp enclosure, or wind screens, whichever is applicable;

DRAFT

PERMITTEE:
International Ship Repair and Repair Services

PERMIT/CERTIFICATION NO.: 0570021-015-AC
PROJECT: New Blasting Media - Copper Slag

SPECIFIC CONDITIONS:

DRAFT

- B) Two emission points for the blasting booth in the main yard:
- 1) the exhaust of the baghouse controlling the blasting booth operations;
 - 2) the front side of the blasting booth (tarp enclosure).

The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.

[Rules 62-4.070(3), 62-296.320(4)(b)4., F.A.C. , Permit Nos. 0570021-013/014-AC/AV]

B.9. Compliance testing shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity, meaning the uninterrupted operation of sixteen abrasive blasting nozzles (90% rated capacity is represented by fifteen nozzles). The blasting booth in the main yard will be limited to the number of nozzles used during the most recent compliance visible emissions test. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Environmental Protection Commission of Hillsborough County. Failure to submit the input rates and actual operating conditions, including the number of nozzles that operated, may invalidate the test. Ambient wind speed and direction shall be reported with the test.

[Rules 62-4.070(3) and 62-297.310(2), F.A.C.]

{Permitting Note: The number of blasting nozzles used during the annual compliance testing will establish the maximum number of nozzles allowed, plus 10%, per ship, up to a maximum of 16 facility-wide. As an example, if the facility tests a ship with 12 nozzles, then the maximum number of nozzles that can be used on any single ship is 13 nozzles (110% of the original 12). The facility would be able to use any combination of nozzles on any number of ships, as long as no more than 13 nozzles are used on any single ship, and no more than 16 nozzles can be in operation across the facility at any one time. Additional testing with 15 nozzles could be done to achieve the maximum 16 nozzles for a single ship, if necessary, with prior notice to EPC}.

B.10. The permittee shall notify the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. Two copies of any visible emissions compliance testing shall be submitted to the Air Management Division of the EPC within 45 days of such testing.

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

B.11. In order to insure compliance with the permit restrictions and emission limitations of Specific Condition No. B.2., the permittee shall maintain the following records:

- A) Day, Month, Year
- B) Amount and type of abrasive blasting material used
- C) Monthly and 12-month rolling totals of abrasive blasting material used
- D) Number of blasting nozzles used per blasting operation on the dry dock and at the blasting booth or containment area for the miscellaneous metals parts blasting
- E) Amount of diesel fuel used
- F) Sulfur content of the diesel fuel

DRAFT

PERMITTEE:
International Ship Repair and Repair Services

PERMIT/CERTIFICATION NO.: 0570021-015-AC
PROJECT: New Blasting Media - Copper Slag

SPECIFIC CONDITIONS:

DRAFT

The permittee shall also maintain monthly records of periodic monitoring results in order to demonstrate compliance with Specific Condition Nos. B.4., B.5. and B.6. The periodic monitoring records should document all required VE observations including dates, times and ship identity. The records should also identify any nighttime blasting activities that prevented required observations or testing including appropriate dates, times and ship identity. [Rule 62-4.070(3), F.A.C.]

B.12. Records required by Specific Condition B.11. shall be maintained for a minimum of 5 years and the calendar year-ending 12-month totals from Specific Condition B.11 shall be included in the “Annual Operating Report for Air Pollutant Emitting Facility” (see Facility-Wide Specific Condition No. 11.). [Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C.]

B.13. The following reasonable precautions shall be taken to control the emissions of unconfined particulate matter associated with the blasting booth located in the main yard:

- A) Using only coal slag, steel shot or copper slag for abrasive blasting materials within the booth unless prior approval is received from the Environmental Protection Commission of Hillsborough County to use another material.
- B) Using no spent abrasive material, except for steel shot used within a closed blasting system.
- C) The curtain/tarp on the front side of the booth shall be closed during any active blasting operation in order to help prevent excess emissions from exiting the booth.
- D) The curtain/tarp on the front side of the booth must have at least a 95% shade factor.
- E) The exhaust system (baghouse) for the blasting operation shall be in operation at all times during active blasting of parts in the booth.
- F) Requiring that all blasting operators be trained on procedures which minimize airborne emissions of blasting materials and instructed on the designed operation of the blasting booth and its control system. Records of training (when it was offered and who attended) shall be maintained and be made available for inspectors of the Environmental Protection Commission of Hillsborough County upon request.
- G) Using only manual sweeping and vacuum systems to clean-up spent blasting materials. No blowers are permitted.
- H) All miscellaneous metal parts to be blasted separate from the dry docks shall be placed within the blasting/coating booth whenever practical.
- I) A daily visible emission check of the building and baghouse exhaust stack shall be conducted and recorded during active blasting operations on any date that blasting occurs in the booth. If any emissions are observed, the permittee shall immediately conduct a 12-minute visible emission observation during active blasting using EPA Method 9 contained in 40 CFR 60, Appendix A to ensure compliance with the 5% opacity limit. If any emissions over 5% opacity are observed, the permittee shall initiate immediate corrective action to eliminate excessive visible emissions.

[Rules 62-296.320(4)(c)2. and 62-4.070(3), F.A.C., Permit No. 0570021-013-AC and Construction Permit Application received on May 18, 2015]

DRAFT

PERMITTEE:
International Ship Repair and Repair Services

PERMIT/CERTIFICATION NO.: 0570021-015-AC
PROJECT: New Blasting Media - Copper Slag

SPECIFIC CONDITIONS:

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

DRAFT

Richard D. Garrity, Ph.D.
Executive Director