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PERMITTEE

Advantage Steel, Inc.
5101 24th Ave. South
Tampa, FL 33619

Air Permit No. 0570328-007-AO
Effective Date: December 28, 2016
Expiration Date: December 28, 2021

Authorized Representative:
John R. Butin, President

Surface Coating of Miscellaneous Metal Parts and Products
Hillsborough County, Florida

PROJECT

This is the final air operation permit, which authorizes the operation of Advantage Steel, Inc., a Surface Coating of Miscellaneous Metal Parts and Products facility (Standard Industrial Classification No. 34, Fabricated Metal Products). This project renews the operation of the facility, which involves the surface coating of miscellaneous metal parts and products. The facility is located in Hillsborough County at 5101 24th Ave. South in Tampa, Florida. The UTM coordinates are Zone 17, 362.31 kilometers (km) East, and 3089.80 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

Permitting Authority: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). 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 and mailing address is: 3629 Queen Palm Dr., Tampa, Florida 33619. The Permitting Authority's telephone number is 813/627-2600.

Petitions. A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition 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. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. 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 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 Department's action is based must contain the following information:

Environmental Excellence in a Changing World

Roger P. Stewart Center

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

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FINAL AIR OPERATION PERMIT

(a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone of the petitioner; the name, address and telephone 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 how and when each petitioner received notice of the agency action or proposed action; (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, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action 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.

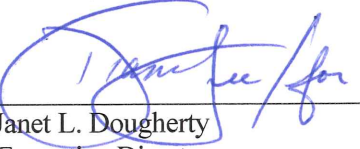
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of 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.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602, 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida



Janet L. Dougherty
Executive Director

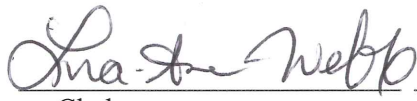
FINAL AIR OPERATION PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package 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 the date indicated below to the following persons.

John R. Buntin – Advantage Steel, Inc. JB@AdvantageSteelInc.com

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.

 12/28/2016
Clerk Date

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

This permit authorizes the operation of a Surface Coating of Miscellaneous Metal Parts and Products facility. The operation consists of miscellaneous metal parts forming, cleaning, and coating. The process begins by shaping, cutting, welding, and drilling of metal components, as necessary. If needed, the metal components are blasted in an enclosed Wheelabrator steel shot blasting station described below. The components are then spray coated in open or partially enclosed areas.

Spray coating of the metal components is performed using either airless or conventional spray guns. The components are coated either inside a partially enclosed steel structure or in an open area on the facility's property. Overspray from the spray coating operation is controlled by the use of reasonable precautions (i.e. maintenance of perimeter vegetation, tarps on the ground, etc.). The facility is subject to Rule 62-296.513, F.A.C. - Surface Coating of Miscellaneous Metal Parts and Products, which limits the VOC content of the coatings to 3.5 pounds/gallons.

The enclosed Wheelabrator blasting booth utilizes steel shot to prepare the metal components for spray coating, as needed. It is located inside the partially enclosed steel structure where the fabrication and coating operations are also conducted. Particulate matter emissions from the blasting booth are vented to an integrated baghouse, which is located in an enclosed, adjacent room. The baghouse exhausts inside this room. Due to its low potential to emit particulate matter, the operation of the Wheelabrator has been determined to be exempt from air permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C.

The existing facility consists of the following emissions unit (EU).

EU No.	Emission Unit Description
001	Structural Steel Fabrication and Painting

APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
<i>State Rule Citations</i>	
62-296.500, F.A.C. - Reasonably Available Control Technology (RACT) – Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities	001
62-296.513, F.A.C. - Surface Coating of Miscellaneous Metal Parts and Products	001

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 (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

- FW1. Permitting Authority:** The permitting authority for this project is the Environmental Protection Commission of Hillsborough County. The mailing address is 3629 Queen Palm Dr., Tampa, Florida 33619. All documents related to applications for permits to operate an emissions unit shall be submitted to the Environmental Protection Commission of Hillsborough County.
- FW2. Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Environmental Protection Commission of Hillsborough County at: 3629 Queen Palm Dr., Tampa, Florida 33619.
- FW3. Appendices:** The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).
- FW4. 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.
- FW5. 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.]
- FW6.** The permittee shall apply for a timely revision of this permit, if affected by the promulgation of any federal NESHAP applicable to this facility. [Rule 62-4.070(3), F.A.C.]
- FW7. Modifications:** 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(1) and 62-212.300(1)(a), 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
- Note: Items A) and B) are not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit.
- FW8.** If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (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.]
- FW9.** The permittee shall not circumvent any air pollution control device, or allow the emissions of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
- FW10.** The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-210.200 (Definitions) and 62-296.320(2), F.A.C.]
- FW11.** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere visible emissions equal to or greater than 20% opacity from the process building and from any other particulate matter emitting source. [Rules 62-296.320(4)(b)1, F.A.C. and Rule 1-3.52, HCEPC]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

FW12. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation or materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. [Rule 62-296.320(4)(c)1., F.A.C.]

FW13. Renewal. Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. [Rule 62-4.090, F.A.C.]

FW14. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Environmental Protection Commission of Hillsborough County. The facility shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU No. 001 – Structural Steel Fabrication and Painting

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	Structural Steel Fabrication and Painting

The operation begins by shaping, cutting, welding, and drilling of metal components, as necessary. The components are then spray coated using either airless or conventional spray guns. The components are coated either inside a partially enclosed steel structure or in an open area on the facility's property. Overspray from the spray coating operation is controlled by the use of reasonable precautions.

PERFORMANCE RESTRICTIONS

A.1. VOC/HAP Coating and Work Practice Limitations. In order to ensure compliance with Specific Condition No. A.4., the following restrictions and limitations shall apply: [Rules 62-4.070(3), 62-210.200 – “Potential to Emit”, and 62-296.320, F.A.C.]

- A) The amount of coating(s), as applied, shall not exceed 5,652 gallons per any 12 consecutive month period;
- B) The spray coating operation shall be performed only in designated spray coating areas over an impervious layer to prevent paint overspray and solvents from entering the soil;
- C) Material safety data sheet for each coating and solvent shall be maintained on site and be made available upon request to any local, state, or federal air pollution agency;
- D) Utilize best management practices to control paint overspray including, but not limited to, use of tarps, maintenance of perimeter vegetation, minimization of spray painting during high winds, and spraying with the nozzle directed downward as much as practical;
- E) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, or in active use;
- F) Immediately attend to all spills/waste as appropriate;
- G) The permittee shall collect on a regular basis and dispose of or recycle the soiled cleaning rags/papers or tarps used to collect the overspray paint in an acceptable manner.
- H) The permittee is prohibited from using a cleaning solvent containing any volatile organic compounds or hazardous air pollutant as defined by Rule 62-210.200, F.A.C.
- I) All empty paint drums may be cleaned and air dried. The unusable paint and drum washings shall be collected and disposed of by a licensed agent.

A.2. Restricted Operation: The hours of operation of are not limited (8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.3. The volatile organic compounds shall not exceed 3.5 pounds per gallon mixture of coatings, binders, and thinners, excluding water, delivered to a coating applicator. [Rule 62-296.513(2)(a)2., F.A.C.]

A.4. VOC/HAP Emission Limitations. As requested by the permittee, in order to limit the potential to emit and establish the facility as a synthetic minor for both Volatile Organic Compound (VOCs) and Hazardous Air Pollutants (HAP), the following emission limitations shall apply: [Rules 62-210.200 (PTE), 62-4.070(3), F.A.C. and Air Construction Permit AC29-1505]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU No. 001 – Structural Steel Fabrication and Painting

- A) VOC emissions from the surface coating operations shall not exceed 9.9 tons per any 12 consecutive month period;
- B) HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month periods for any individual HAP, and less than 25 tons in any 12 consecutive month periods for the total of all HAPs combined.

A.5. The volatile organic compound emissions from solvent washings shall be considered in the emission limitations of Specific Condition Nos. A.3. and A.4., unless the solvent is directed into containers that prevent evaporation into the atmosphere. [Rule 62-296.513(2)(c), F.A.C.]

TESTING REQUIREMENTS

A.6. VOC/HAP Compliance Method. Compliance with the emission limitation of Specific Condition No. A.3. shall be determined using EPA Method 24, the EPA VOC DATA SHEET, or a certification by the coating manufacturer of the composition of the coating if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings". This documentation shall be kept on-site for each coating applied and be made available upon request to the Environmental Protection Commission of Hillsborough County, state, or federal agency. [Rule 62-296.500(2)(b)2. and 4., F.A.C.]

A.7. Test Methods: Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
24	Determination Of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

RECORDS AND REPORTS

A.8. In order to demonstrate continuous compliance with Specific Condition Nos. A.1., A.3., and A.4., the permittee shall maintain daily records of all operations necessary to substantiate the monthly coating(s) usage. These records shall be maintained onsite for at least three years from the date of measurement and be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request. The records shall include, but not be limited to the following: [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

- A) Day, Month, and Year of the data recorded;
- B) Product name/number and VOC content (lb/gal) of each coating used, as applied;
- C) Monthly totals, in gallons, of each coating used, including any thinner or reducer added to the coating, if applicable;
- D) Monthly VOC, individual HAP species, and total combined HAP emissions for surface coating operations;
- E) Twelve (12) month rolling totals of items C) and D) of this specific condition