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PERMITTEE

Ring Power Corporation
500 World Commerce Parkway
St. Augustine, Florida 32092

Air Permit No. 0571384-004-AO
Effective Date: July 14, 2016
Renewal Application Due Date: May 15, 2021
Expiration Date: July 14, 2021

Authorized Representative:
Shane McLaughlin, Assistant Vice
President

Abrasive Grit Blasting Operation
Hillsborough County, Florida

PROJECT

This is the final air operation permit, which authorizes the operation of an abrasive grit blasting operation at Ring Power Corporation (Standard Industrial Classification No. 50 for Wholesale Trade – Durable Goods). The facility is located in Hillsborough County at 10421 Fern Hill Dr., Riverview, Florida 33578. The UTM coordinates are Zone 17, 367.65 km East, and 3081.17 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 address is: 3629 Queen Palm Dr., Tampa, Florida 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.

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

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FINAL AIR OPERATION PERMIT

(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: (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 number 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.

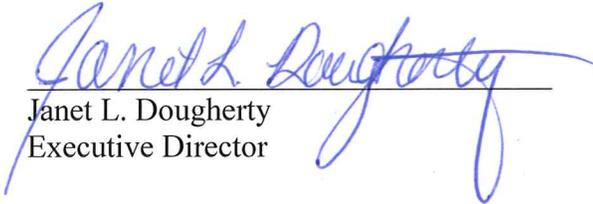
Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for 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.

FINAL AIR OPERATION PERMIT

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY



Janet L. Dougherty
Executive Director

FINAL AIR OPERATION PERMIT

CERTIFICATE OF SERVICE

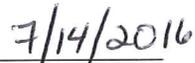
The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested, or was sent via mail, before the close of business on the date indicated below to the following persons.

Shane McLaughlin – Ring Power Corporation shane.mclaughlin@ringpower.com
Thomas Drygas – Diversified Engineering International, Inc. tom@dei-inc.com
Dave Strickland – Ring Power Corporation dave.strickland@ringpower.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.



Clerk



Date

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

Ring Power Corporation sells and services heavy-duty industrial machinery and equipment. This permit authorizes the operation of one abrasive grit blasting booth, which is used to remove old coatings and rust on the metal surfaces of the equipment. The blast media is garnet abrasive and is propelled by an electric-powered air compressor through two hoses within a fully enclosed blast booth.

According to the manufacturer, ABS Blast, Inc., approximately 20% of the grit used during blasting is suspended in the air, along with surface contaminants, as "float dust" particles and is directed to the baghouse described below. The remaining 80% of the grit falls to the floor of the booth and is recovered for reuse. The grit is manually swept into a below grade hopper along the edge of the blasting booth and conveyed by an auger to the abrasive grit storage hopper for reuse.

The exhaust air stream passes through a mechanical, air wash abrasive separator, which removes the contaminants and spent blast media. The airstream then continues to a 38,000 cfm ABS Blast, Inc. Model ADFT 4-64, pulse jet dust collector.

The facility also operates the following exempt activities:

- A VOC surface coating operation. The surface coating operation takes place within one of two fully enclosed booths. Each booth has one 4.86 MMBtu/hr natural gas fired heater and filters on all sides to capture the overspray. The operation is categorically exempt pursuant to Rule 62-210.300(3)(a)27., F.A.C. – *Surface Coating Operations*.
- A fully enclosed and automated cylinder rod grit blasting machine with an integrated cyclone separator to recover useable grit. The cyclone is vented to a cartridge filter dust collector that exhausts within the building. This operation is exempt pursuant to Rule 62-210.300(3)(b), F.A.C.
- A fully enclosed and automated cylinder rod thermal coating machine, which sprays a powder coating of chromium and/or nickel compounds onto hydraulic cylinders. The coating is injected into a thermal spray gun, which passes the coating through a natural gas flame. The overspray is exhausted to a six-cartridge filter dust collector located on the exterior of the building followed by a pre-filter and HEPA filter downstream of the fan. This operation is exempt pursuant to Rule 62-210.300(3)(b), F.A.C.
- A blast cabinet manufactured by Kelco Abrasive Blast Cleaning Equipment with an integrated dust filter. This operation is exempt pursuant to Rule 62-210.300(3)(b), F.A.C.
- Natural gas-fired equipment such as hot water generating units for pressure washing and steam cleaning; building space heaters; heaters on the paint booths; and the cylinder rod thermal coater. This operation is categorically exempt from permitting pursuant to Rule 62-210.300(3)(a)34., F.A.C. - *Fossil Fuel Steam Generators, Hot Water Generators, And Other External Combustion Heating Units With Heat Input Capacity Less Than 100 Million Btu Per Hour* provided the natural gas usage does not exceed 150 million standard cubic feet of natural gas per year.

SECTION 1. GENERAL INFORMATION

The facility consists of the following emissions unit.

Emission Unit No.	EU Description
001	Abrasive Grit Blasting

APPLICABLE REGULATIONS

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

Regulation	EU No(s).
<i>State Rule Citations</i>	
Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards	001
Rule 62-296.700, Reasonably Available Control Technology – Particulate Matter, F.A.C.	001
Rule 62-296.712, F.A.C. – Miscellaneous Manufacturing Process Operations	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(PSD), F.A.C.

References Permit No.: 0571384-001-AC

Replaces Permit No.: 0571384-002-AO

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. 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.
2. 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.
3. 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).
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. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the EPCHC may require the permittee to conform to new or additional conditions. The EPCHC shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the EPCHC may grant additional time. [Rule 62-4.080, F.A.C.]
7. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the EPCHC. Such permit shall be obtained prior to beginning construction or modification. The following may also require prior authorization before implementation: [Rule 62-210.200, 62-210.300, and 62-4.070(3), F.A.C. and Permit No. 0571384-001-AC]
 - 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;
 - C) Any change in the type of abrasive blast media used at the facility.

Note: Items A) and B) are not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

8. 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 EPCHC. [Rule 62-4.090, F.A.C.]
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.
10. 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.. [Rule 62-296.320(2), F.A.C. and Permit No. 0571384-001-AC]
11. 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. and Permit No. 0571384-001-AC]
12. 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.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Abrasive Grit Blasting

This section of the permit addresses the following emissions unit.

Emission Unit No.	EU Description
001	Abrasive Grit Blasting

The grit blasting operation involves removing old coatings and rust on the metal surfaces of the equipment. The operation takes place in a fully enclosed blasting booth. The blasting operation uses garnet abrasive as a blasting media and uses a maximum of two blasting nozzles. Particulate matter emissions from the booth are controlled by a 38,000 dscfm ABS Blast, Inc., Model ADFT 4-64, dust collector.

PERFORMANCE RESTRICTIONS

A.1. Operating hours for this facility are not limited. Therefore, this facility is permitted to operate continuously; 8,760 hours per consecutive 12 month period. [Rule 62-210.200 (Potential to Emit), F.A.C. and Permit No. 0571384-001-AC]

EMISSIONS STANDARDS

A.2. In order to limit the potential to emit, the maximum allowable particulate matter (PM) emissions from the abrasive grit blast booth shall not exceed 0.03 grains per dry standard cubic feet with the potential to emit (PTE) equivalent of 41.0 tons per year. [Rules 62-210.200 – “Potential to Emit” and 62-296.712(2), F.A.C. and Permit No. 0571384-001-AC]

A.3. Visible emissions from the abrasive grit blasting operation shall not exceed 5% opacity. [Rule 62-4.070(3), F.A.C. and 62-296.712(2), F.A.C.; Chapter 1-3.51, Rules of the EPC; and Permit No. 0571384-001-AC]

TESTING REQUIREMENTS

A.4. Annual Compliance Tests: In order to demonstrate compliance with Specific Condition A.3, test Emission Unit No. 001 for visible emissions, at the point of highest opacity, annually, once per calendar year (January 1 – December 31). Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-297.310(8)(a)3. and (10) and 62-4.070(3), F.A.C. and Chapter 1-3.52(3), Rules of the EPC]

A.5. EPA Method 9 shall be used to determine compliance with the visible emissions standard specified in Specific Condition No. A.3. The visible emissions test shall be conducted by a certified observer and be a minimum of thirty (30) minutes in duration. The test observation period shall include the period during which the highest opacity can reasonably be expected to occur. The minimum requirements for stationary point source emissions test procedures and reporting shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-296.712(3)(a) and 62-297.310(4)(b), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Abrasive Grit Blasting

- A.6.** Testing of emissions shall be conducted with the source operating at capacity. Capacity for the abrasive grit blasting operation is defined as blasting with 2 nozzles operating simultaneously. If it is impracticable to test at the testing capacity, an emissions unit may be tested at less than the testing capacity. If an emissions unit is tested at less than the testing capacity, another emissions test shall be conducted and completed no later than 60 days after the emissions unit operation exceeds 110% of the capacity at which its most recent emissions test was conducted. Failure to submit the actual operating conditions, including the pressure differential across the dust collector, may invalidate the test. [Rules 62-4.070(3) and 62-297.310(3)(b), F.A.C. and Permit No. 0571384-001-AC]
- A.7.** Test Requirements: At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the EPCHC, unless shorter notice is agreed to by the EPCHC. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the appropriate air compliance program a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the appropriate air compliance program by mutual agreement. In addition, tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(9), F.A.C.]
- A.8.** 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 or other approved methods, as deemed necessary. [Rules 62-297.310(8)(c) and 62-4.070(3), F.A.C.]
- A.9.** Test Methods: Required tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

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 EPCHC. [Rules 62-297.310 and 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

- A.10.** Operation and Maintenance Plan for Particulate Control. In order to provide reasonable assurance that the ABS Blast, Model ADFT 4-64, dust collector will be properly operated and

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Abrasive Grit Blasting

maintained, the abrasive grit blasting (EU 001) operations shall be conducted according to the Abrasive Blast System & Paint Booth Operation & Maintenance Schedule. At a minimum, the following performance parameters and maintenance shall be checked and recorded: [Rules 62-4.070(3) and 62-296.700(6), F.A.C.]

A) Abrasive Blast System

1. APCD: Pulse Jet Cartridge Dust Collector
2. Manufacturer: ABS Blast, Inc.
3. Model: ADFT 4-64
4. Air Flow: 38,000 scfm
5. Air to Cloth Ratio: 2.3:1
6. Operating Pressure Drop: 0 – 6 inches w.g)
7. Filter Type: 64 cartridge filters, model FLTR110701AH
8. Cleaning Method: Reverse Air Pulse Jet
9. Maintenance:
 - a) Daily (when in operation), record the pressure drop of the baghouse
 - b) Monthly, inspect and record the condition of the flex hose on the waste collection drum(s) and monitor the dust collector exhaust for visible emissions;
 - c) Annually, inspect and record the functionality of the pressure differential gauge, slide gate gasket and condition of all ductwork and dust collector body.

RECORDS AND REPORTS

A.11. Test Reports: The permittee shall submit two (2) copies of the visible emissions test report to the Air Compliance Section of the EPC within forty-five (45) days after the test is completed. The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. For each test run, the report shall also indicate the following: [Rule 62-297.310(10), F.A.C.]

- A) The equipment blasted during the test
- B) The pressure differential across the dust collector during the test
- C) The number of blasting nozzles used during the test

A.12. In order to demonstrate continuous compliance with Specific Condition Nos. A.1., A.2., and A.10, the permittee shall maintain records of the abrasive blasting operation. These records shall be maintained onsite and made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request and kept on file for at least three years from the date of measurement. The records shall include, but not limited to, the following: [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C. and Permit No. 0571384-001-AC]

- A) Day, Month, and Year

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Abrasive Grit Blasting

- B) Monthly total of the hours of operation for the blasting baghouse
- C) Twelve (12) month rolling total of B) above
- D) Records of the baghouse pressure drop and the inspections required by Specific Condition No. A.10.
- E) Maintain monthly coating and solvent usage records.