



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Wheelblast, Inc.
3951 Copeland Drive
Zephyrhills, FL 33542

Air Permit No. 1010325-012-AO
Permit Expires: 06/07/2017
Minor Air Operation Permit
Operation Permit Revision

Authorized Representative:
Mr. Michael B. Lynch, President

This is the final permit for the revision of Air Operation Permit No. 1010325-010-AF for a painting and abrasive blasting operation at Wheelblast, Inc. (Standard Industrial Classification No. 3430). The facility is located in Pasco County at 3951 Copeland Drive in Zephyrhills, Florida. The UTM coordinates are Zone 17, 386.4 km East, and 3121.4 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to 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.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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. 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 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

- (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 when and how the petitioner received notice of the agency 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 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 Department'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 of the Florida Administrative Code.

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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

 12/02/2013

Kelley M. Boatwright

Effective Date

District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) 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 persons listed below.

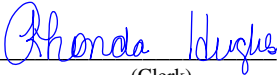
Michael B. Lynch, Wheelblast, Inc.
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James Shirk, P.E.
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Eric DiBacco SWD Compliance Assurance Program Team Leader Manager
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Clerk Stamp

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)

12/2/2013
(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility abrasively blasts and then paints structural steel products. The facility consists of the following emissions units.

Facility ID No. 1010325	
EU ID No.	Emissions Unit Description
001	Spray Painting Operation and General Solvent Usage
002	Outdoor Open Air Abrasive Blasting Operation

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

Exempt Emission Sources/Activities

- Some abrasive blasting occurs inside a large building. Particulate matter (PM) emissions are controlled by two (2) interior-discharging baghouses. This process is exempt in accordance with the provisions of Rule 62-4.040(1)(b), F.A.C. (insignificant emissions).

Exemptions under Rule 62-4.040(1)(b), F.A.C. (insignificant emissions), may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1010325-010-AF and incorporates the terms and conditions of Construction Permit No. 1010325-011-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

3. Appendices - The following Appendices are attached as part of this permit:

- a. Appendix A. Citation Formats and Glossary of Common Terms;
- b. Appendix B. General Conditions;
- c. Appendix C. Common Conditions; and
- d. 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. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]
6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.

[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the applicant shall submit the following:

- a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
- b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and
- c. copies of the most recent month of records/logs specified in Specific Condition Nos. A.6. and B.4.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Spray Paint Operation and General Solvent Usage

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	<u>Spray Paint Operation and General Solvent Usage</u> - Structural steel components and miscellaneous metal parts are coated utilizing hand held spray guns (a maximum of 4 spray guns). The products are painted in a paved, open yard west of the large blasting building (between the building and the railroad tracks) unless it is windy. Then the products are painted in a large open warehouse located near the east side of the property. The painted parts are air-dried. There is also a small steel fabrication area south of the blasting building.

PERFORMANCE RESTRICTIONS

- A.1.** Volatile Organic Compound Emissions and/or Organic Solvent 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. The following procedures shall be utilized to minimize pollutant emissions:
- all equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials;
 - tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use;
 - immediately confine and clean up VOC and/or solvent spills, and make sure wastes are placed in closed containers for reuse, recycling or proper disposal; and
 - used cleanup solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations.

[Rule 62-296.320(1), F.A.C.; Construction Permit 1010325-008-AC]

- A.2.** Unconfined Emissions of Particulate Matter - Reasonable precaution shall be taken to control emissions of unconfined particulate matter from spray painting operations. Reasonable precautions for this emissions unit shall include the following:

- spray screens shall be used to control overspray from painting as necessary to prevent unconfined particulate matter (overspray) from the leaving the property;
- the large open warehouse is used for painting on windy days to reduce the spread of wind driven overspray; and
- if needed, additional mesh screen may be erected to reduce wind flow across paint spraying areas.

In order to provide reasonable assurance that the precautions and practices taken are adequate, visible emissions at the property boundary should not exceed 5 percent opacity. Exceedance of this limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary.

{Permitting Note: Reasonable precautions were specified in the permit renewal application dated 5/16/2012}

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Spray Paint Operation and General Solvent Usage

- A.3.** Hours of Operation: The hours of operation are not limited (8,760 hours per year).
[Rule 62-210.200 ("Potential to Emit"), F.A.C.]

EMISSIONS STANDARDS

- A.4.** Volatile Organic Compounds (VOC) Emission Limitation - VOC emissions from surface coating and general solvent usage shall not exceed 49.0 tons per any consecutive 12-month period.
[Rule 62-210.200, F.A.C. ("Potential to Emit"); Construction Permit 1010325-008-AC]
- A.5.** Total Hazardous Air Pollutants (HAPs) Emission Limitation - Total HAP emissions from surface coating and general solvent usage shall not exceed 9.0 tons per any consecutive 12-month period.
[Rule 62-210.200, F.A.C. ("Potential to Emit"); Construction Permit 1010325-008-AC]

RECORDKEEPING REQUIREMENTS

- A.6.** VOC and Total HAP Recordkeeping - The permittee shall keep monthly logs to document compliance with the VOC and total HAPs limitations of Specific Condition Nos. A.4. and A.5. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC/HAP emissions, provided that no materials are used which are not purchased. The monthly logs shall include, but not be limited to, the following information:
- facility name, facility ID No., emission unit ID No., and description (i.e., Wheelblast, Inc., 1010325, EU No. 001, Spray Painting Operation and General Solvent Usage);
 - name and monthly usage in gallons (gal) of each paint and/or solvent used;
 - VOC content and HAPs content (lbs/gal or by weight fraction) of each paint and solvent used;
 - the total VOC emissions in tons calculated monthly and the total VOC emissions during the most recent consecutive 12-month period; and
 - the total HAP emissions in tons calculated monthly and the total HAP emissions during the most recent consecutive 12-month period.

Supporting documentation (MSD sheets, purchase orders, etc.) which includes sufficient information to determine VOC and HAP emissions shall be kept for each paint and solvent used.

The monthly logs shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years in a form suitable for inspection and be made available to the Department upon request.

[Rule 62-4.070(3), F.A.C., Construction Permit 1010325-008-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

B. EU No. 002 Outdoor Open Air Abrasive Blasting Operation

This section of the permit addresses the following emissions unit (EU).

ID No.	Emission Unit Description
002	<u>Outdoor Open Air Abrasive Blasting Operation</u> - Outdoor open air abrasive blasting will be utilized to blast large pieces that are too large to be blasted in the exempt on-site abrasive blasting building. The emissions from outdoor open air abrasive blasting are minimized by applying reasonable precautions and work practice requirements.

PERFORMANCE RESTRICTIONS

- B.1.** Permitted Capacity - The blast media throughput from abrasive blasting is limited to 2,400 tons per any consecutive 12-month period.
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1010325-011-AC]
- B.2.** Hours of Operation - The hours of operation are not limited (8,760 hours per year).
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1010325-011-AC]
- B.3.** Unconfined Emissions of Particulate Matter - Reasonable precaution shall be taken to control emissions of unconfined particulate matter resulting from abrasive blasting operations. Reasonable precautions for this emissions unit may include the following:
- the use of screens;
 - landscaping or planting of vegetation;
 - ceasing operations if wind conditions or other circumstances result in fugitive dust causing a public nuisance problem outside the property boundaries.

In order to provide reasonable assurance that the precautions and practices taken are adequate, visible emissions at the property boundary should not exceed 5 percent opacity. Exceedance of this limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

RECORDKEEPING REQUIREMENTS

- B.4.** Monthly Recordkeeping - The permittee shall keep records monthly to document compliance with the blast media throughput limitation of Specific Condition B.1. The records shall include the following for each calendar month:
- facility name, facility ID No., emission unit ID No., and description (i.e., Wheelblast, Inc., 1010325, EU No. 002 Outdoor Open Air Abrasive Blasting Operation);
 - month/year;
 - amount of blast media used in the outdoor open air abrasive blasting operations (tons/month); and
 - total amount of blast media used (tons/year) for the most recent consecutive 12-month period.

Monthly records shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1010325-011-AC]