



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

FINAL PERMIT

PERMITTEE

Coastal Steel Construction, Inc.
1000 31st Street South
St. Petersburg, Florida 33712

Authorized Representative:
Mr. Greg Best, President

Air Permit No. 1030155-004-AO
Permit Expires: 01/05/2020
Minor Air Operation Permit
Project: Air Operation Permit Renewal

This is the final permit to renew Air Operation Permit No. 1030155-004-AO for a surface coating operation (Standard Industrial Classification No. 3441). The facility is located in Pinellas County at 1000 31st Street South in St. Petersburg, Florida. The UTM coordinates are Zone 17, 335.05 km East, and 3071.79 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific

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 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 final permit. 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) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, 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

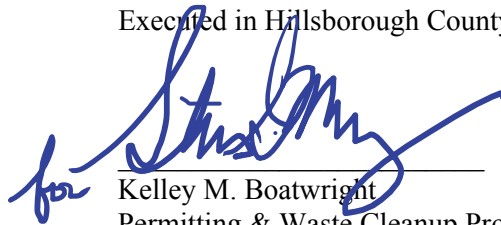
statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including 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 final 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 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

for

Kelley M. Boatwright
Permitting & Waste Cleanup Program Administrator
Southwest District

1/5/2015

Effective Date

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.

Greg Best, Coastal Steel Construction, Inc. (LindaD@coastalstpete.com)

Lynn Robinson, P.E., Southern Environmental Sciences, Inc. (Lrobinson@sesfla.com)

Sherrill Culliver, Pinellas County Air Quality Division (sculliver@co.pinellas.fl.us)

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.

Rhonda Hughes
(Clerk)

1/5/2015
(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY DESCRIPTION

The facility uses an airless spray system to coat fabricated metal products (structural steel) with primer paint. The painting activities at this facility are subject to the Volatile Organic Compound- Reasonable Available Control Technology (VOC-RACT) requirements of Rule 62-296.513, F.A.C.

Facility ID No. 1030155	
EU ID No.	Emissions Unit Description
001	Surface Coating Operations

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

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)

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1030155-003-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

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

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air_Permitting@dep.state.fl.us

All documents related to applications for permits shall be submitted to the above e-mail address and/or address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to Pinellas County Air Quality Division (PCAQD). The mailing address, phone number and e-mail address of the Local Air Program is:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida 33756
Telephone: 727-464-4422
E-mail: Airquality@pinellascounty.org

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 change or changes in the method of operations or addition to a facility that would result in an increase in the

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

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 with a copy to PCAQD (Compliance 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 No. A.5.[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.]

FACILITY-WIDE SPECIFIC CONDITIONS

9. General Standards - Objectionable Odor - No person shall 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("Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas County Code, §58- 102 & 178]
10. General Standards - Visible Emissions - 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.]
11. General Standards - VOC Emissions and/or 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. The facility shall comply with the following:
 - a. 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.
 - b. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere or become subject to Specific Condition No. A.3.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

- c. Tightly cover or close all VOC and/or solvent containers when they are not in use.
- d. Prevent excessive air turbulence across exposed VOC.
- e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Pinellas County Code, §58-178]

- 12. General Standards - Unconfined Particulates** - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include, but not be limited to the following:

- a. Watering the facility's grounds as needed.
- b. Ceasing of paint operations if overspray is observed leaving the facility property line.

In order to provide reasonable assurance that the above measures are being implemented and that they are effective in controlling unconfined emissions of particulate matter, visible emissions from any facility area should not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but an indication that additional controls may be required.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C. and Construction Permit AC52-267942]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 – Surface Coating Operations

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

EU ID No.	Emissions Unit Description
001	<u>Surface Coating Operation</u> – The surface coating operations consist of a spray painting area that is covered and approximately 60’ X 60’ in size. The spray painting area is located in the northeast corner of the facility’s fabrication shop.

PERFORMANCE RESTRICTIONS

- A.1.** Material Use Limit - The maximum total raw material usage of coatings and solvents shall not exceed 4,908 gallons per any consecutive 12-month period.
[Construction Permit AC52-267942]
- A.2.** Hours of Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

- A.3.** Material VOC Content - This facility is limited to the use of coatings that do not exceed 3.5 pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator (“as applied”). Unless directed into containers that prevent evaporation into the atmosphere, the use of solvent washings shall be included in the “as applied” VOC coating content.
[Rules 62-296.513(2)(a)2. and (2)(c), F.A.C.]
- A.4.** VOC Emission Standard - The facility is subject to the following limitations:
Total facility Volatile Organic Compound (VOC) emissions shall not exceed 9.9 tons per any consecutive 12-month period.
- a. Emissions attributed to use of coatings shall not exceed 8.5 tons per any consecutive 12-month period.
 - b. Emissions attributable to use of solvents shall not exceed 1.4 tons per any consecutive 12-month period.

{Permitting Note: The VOC emission limitations above indirectly limit the potential HAP emissions below the Title V permitting thresholds of Chapter 62-213, F.A.C., since all of the HAPs are expected to be VOC.}

[Rule 62-210.200(PTE), F.A.C.; Construction Permit AC52-267942]

RECORDKEEPING REQUIREMENTS

- A.5.** VOC Recordkeeping - In order to document compliance with the limitations of Specific Condition Nos. A.1., A.3., and A.4., the permittee shall maintain a log at the facility which documents the following:

Daily:

- a. Facility name, Facility ID No. (1030155), Emission Unit No. & Description (001-Surface Coating Operations), and applicable rule [62-296.513(2)].
- b. The application method and substrate type (metal, plastic, paper, etc.).

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 – Surface Coating Operations

- c. The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent used in gallons at each point of application, including exempt compounds.
- d. The VOC content as applied in each coating and solvent.
- e. The date for each application of coating and solvent.
- f. The amount of each surface preparation, clean-up, wash-up solvent (including exempt compounds) used in gallons and the VOC content of each.

Monthly:

- g. Facility name, Facility ID No. (1030155), Emission Unit No. & Description (001-Surface Coating Operations).
- h. The total raw material usage of coatings and solvents (gallons).
- i. The VOC emissions from the use of coatings (tons).
- j. The VOC emissions from the use of solvents (tons).
- k. The most recent consecutive 12-month total of raw material (coatings and solvents) used (gallons).
- l. The most recent consecutive 12-month total of the total facility VOC emissions (tons).
- m. The most recent consecutive 12-month total of VOC emissions from the use of coatings (tons).
- n. The most recent consecutive 12-month total of VOC emissions from the use of solvents (tons).

Supporting documentation (MSDS, SDS, purchase orders, U. S. EPA "VOC DATA SHEETS", etc.) shall be kept for each paint, coating, thinner, solvent and other material used in the painting and coating operations which includes sufficient information to determine VOC emissions.

These records shall be retained on file at the facility for at least three (3) years and shall be made available to the Department and the Pinellas County Air Quality Division (PCAQD) upon request.

[Rules 62-4.070(3), 62-4.160(14)(b), 62-296.500(2)(b), and 62-296.513(2), F.A.C.; Pinellas County Code §58-90 and Construction Permit AC52-267942]