



# Florida Department of Environmental Protection

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

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

## FINAL PERMIT

### PERMITTEE

Big C Steel, Inc.  
13095 49th St. North  
Clearwater, FL 33762

Air Permit No. 1030190-005-AO  
Permit Expires: 04/06/2016  
Site Name: Big C Steel, Inc.  
Minor Air Operation Permit  
Project Name: Permit Renewal

Authorized Representative:  
Mr. David S. Cox, President

This is the final air operation permit, which authorizes continued painting operations at a steel fabrication facility. The work is conducted at Big C Steel, Inc. (Standard Industrial Classification No. 3441). The facility is located in Pinellas County at 13095 49<sup>th</sup> Street, North in Clearwater, Florida. The UTM coordinates are Zone 17, 332.68 km East, and 3086.29 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

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.

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

Cindy Zhang-Torres      April 6, 2011  
Cindy Zhang-Torres, P.E.      Effective Date  
Air Permitting Manager  
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 04-06-2011 to the persons listed below.

Mr. David S. Cox, President  
Big C Steel, Inc.  
[bigcdavid@yahoo.com](mailto:bigcdavid@yahoo.com)

Mr. Gary Robbins, Environmental Program Coordinator  
Pinellas County Air Quality Division  
[grobbsins@co.pinellas.fl.us](mailto:grobbsins@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.

Patricia Schubert      04-06-2011  
(Clerk)      (Date)

**SECTION 1. GENERAL INFORMATION (FINAL)**

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**FACILITY AND PROJECT DESCRIPTION**

**Existing Facility**

This facility fabricates and paints steel products. The existing facility consists of the following emissions unit.

Facility ID No. 1030190	
ID No.	Emission Unit Description
001	Spray Paint Area for Coating of Structural Steel Products

*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 (HAP).
- 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 (VOCs) and hazardous air pollutants (HAPs).

**PERMIT HISTORY/AFFECTED PERMITS**

Replaces Permit No. 1030190-004-AO

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

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

Florida Department of Environmental Protection  
Southwest District Office  
Air Resource Management Section  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-632-7600

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

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

Pinellas County  
Air Quality Division  
300 South Garden Avenue  
Clearwater, Florida 33756  
Telephone: 727-464-4422

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

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

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6. *(continued)*

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. 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. If the Department and/or Pinellas County Air Quality Division (PCAQD) receives a valid odor complaint, the Department and/or PCAQD reserves the right to require that odor control measures/work practices be implemented.

[Rules 62-4.070(3), 62-210.200 ("Objectionable Odor") and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]

8. Annual Operating Report - The permittee shall submit to the Air Quality Division of Pinellas County each calendar year on or before April 1, 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 also be submitted electronically in accordance with the instructions received with the AOR package sent by the Department. In addition to the requirements of Rule 62-296.500(2)(c), F.A.C. (VOC RACT - Reporting), the annual report shall also include a proof of compliance with the VOC RACT limitations (see Specific Condition No. A.4.). This proof of compliance shall consist of a statement of the VOC content in pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator, for each coating used in the year being reported.

[Rules 62-210.370(3), and 62-296.500(2)(c), F.A.C.]

9. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to the Pinellas County Air Quality Division (Compliance Authority) no later than 60 days prior to the expiration date of the 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
- d. copies of the most recent two months of records/logs specified in Specific Condition No. A.6.

[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. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)**

**B. EU 001 Spray Paint Area for Coating of Structural Steel Products**

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Steel (beams, angles, tube, pipe) purchased from local steel warehouses is fabricated (cut and welded) into stairs and handrails. After fabrication, the steel goes to the paint shop for painting. It dries in place and is either stacked in the back yard awaiting shipment or is loaded directly onto a flatbed truck for delivery to a job site.

**PERFORMANCE RESTRICTIONS**

**A.1. Permitted Capacity** - In order to assure compliance with the emission limitations of Specific Condition No. A.4., total facility coating usage shall not exceed the following limits:

- a. 325 gallons per month; and
- b. 3900 gallons per any 12 consecutive month period.

[Rule 62-210.200 ("Potential to Emit") F.A.C.; Construction Permit AC52-169995]

**A.2. Hours of Operation** - This facility is allowed to operate a maximum of 2,600 hours per year.

[Rule 62-210.200 ("Potential to Emit") F.A.C.; Construction Permit AC52-169995]

**A.3. 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:

- 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 prevent evaporation into the atmosphere.
- c. Tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use.
- d. 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.]

**EMISSIONS STANDARDS**

**A.4. VOC RACT Emission Limitation** - The following emission limitations apply:

- a. No owner or operator of a coating line for miscellaneous metal parts and products shall cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)**

**B. EU 001 Spray Paint Area for Coating of Structural Steel Products**

excess of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator in a coating application system; and

- b. All volatile organic compound emissions from solvent washings shall be considered in the emission limitations in Specific Condition No. A.4.a., above unless the solvent is directed into containers that prevent evaporation into the atmosphere.

[Rules 62-296.513(2)(a)2. and (2)(c), F.A.C. (Reasonably Available Control Technology (RACT) - Volatile Organic Compounds: Surface Coating of Miscellaneous Metal Parts and Products)]

**A.5. VOC Emission Limitations** - This emissions unit shall comply with the following VOC emission limitations:

Operation	Maximum Emission Limits (lbs VOC/month)	Maximum Emission Limits (tons VOC/consecutive 12 month period)
Surface Cleaning	0.0	0.0
Painting	1137.5	6.83
Equipment Cleanup	7.04	0.04
Facility Total	1144.54	6.87

[Rule 62-210.200 ("Potential to Emit") F.A.C.; Construction Permit AC52-169995]

*(Title V Applicability Note: Since all HAPs that are emitted are VOCs, the above VOC emission limitations also ensures that HAP emissions will be below the Title V major source level of 10 tons per year.)*

**RECORDS AND REPORTS**

**A.6. VOC Records** - In order to document compliance with Specific Condition Nos. A.1. - A.2. and A.4. - A.5., and in accordance with Rule 62-296.500(2)(b), F.A.C. (VOC RACT - Recordkeeping), the permittee shall maintain records for all VOC containing materials (coatings, paint, solvents, etc.) which shall contain at a minimum the following:

**DAILY**

- a. facility name, ID No. (1030190), Emission Unit No. (001);
- b. date and description of operation (i.e., Surface Cleaning, Painting, or Equipment Cleanup);
- c. the Rule number applicable to the operation for which the records are being maintained (i.e., Rule 62-296.513, F.A.C. - Surface Coating of Miscellaneous Metal Parts and Products);
- d. application method and substrate type (i.e., spray painting on metal);

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)**

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**B. EU 001 Spray Paint Area for Coating of Structural Steel Products**

- e. amount (gallons) and type (name and description) of coatings and solvent used at each point of application, including exempt compounds;
- f. pounds of VOC per gallon of each coating, excluding water, as applied;
- g. amount of each solvent used (all uses) and the solvent VOC content, including exempt compounds;

MONTHLY

- h. facility name, ID No. (1030190), Emission Unit No. (001);
- i. the total number of hours operated per month (operation consists of periods when surface coating or equipment cleanup is being conducted);
- j. the total number of hours operated for the most recent 12 consecutive months;
- k. the total quantity of coating used per month (gallons);
- l. the total quantity of coatings used for the most recent 12 consecutive months (gallons);
- m. the calculated monthly VOC emissions in pounds for each operation (i.e., Surface Cleaning, Painting, or Equipment Cleanup) based upon coating and solvent usage and their respective VOC contents; and
- n. the calculated most recent 12 consecutive month total for VOC emissions in tons for each operation (i.e., Surface Cleaning, Painting, or Equipment Cleanup) and the total for the facility.

Supporting documentation (MSD sheets, purchase orders, etc.) shall be kept for each coating, which includes sufficient information to determine VOC emissions. All daily records shall be completed within three (3) business days and all monthly records shall be completed by the end of the following month. The logs shall be retained on file at the facility for at least two years, and be made available to the Department and Pinellas County Air Quality Division for inspection upon request.

[Rules 62-4.070(3) and 62-296.500(2)(b), F.A.C.; Pinellas County Code Section 58-90]