



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

13051 North Telecom Parkway
Temple Terrace, Florida 33637

**RICK SCOTT
GOVERNOR**

**HERSCHEL T. VINYARD JR.
SECRETARY**

FINAL PERMIT

PERMITTEE

Seminole Machine & Welding, Inc.
9380 Ulmerton Road
Largo, Florida 33771

Air Permit No. 1030215-004-AF
Permit Expires: 04/09/2018
Site Name: Seminole Machine & Welding, Inc.
Minor Air Operation Permit Renewal

Authorized Representative:
Ms. Dian Miller, Owner

This is the final permit to renew Air Operation Permit No. 1030215-004-AF for a spray painting operation at the Seminole Machine & Welding, Inc. (Standard Industrial Classification No. 3441). The facility is located in Pinellas County at 9380 Ulmerton Road in Largo, Florida. The UTM coordinates are Zone 17, 325.8 km East, and 3086.5 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

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

Kelley M Boatwright 04/09/2013
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.

Ms. Dian Miller, owner, Seminole Machine & Welding, Inc. (DianM@smw-inc.com)

Mr. Gary Robbins, Environmental Program Coordinator, Pinellas County Air Quality Division (grobbins@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)

4/9/2013
(Date)

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

FACILITY AND PROJECT DESCRIPTION

Seminole Machine & Welding, Inc.

This air operation permit is for an existing surface coating operations at a steel fabrication facility. The facility has a spray painting area that utilizes an airless sprayer to apply low solvent paints to various fabricated structural metal parts. The facility consists of the following emissions unit (EU).

Facility ID No. 1030215	
EU ID No.	Emission Unit Description
001	Spray Painting 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 pollutant(s) Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). The permit emission limitations and restriction on the type of surface coating material used will ensure that the facility's VOCs and HAPs emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1030215-003-AF.

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

ADMINISTRATIVE REQUIREMENTS

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

The Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida 33760
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 would result in an

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

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 with a copy to the Pinellas County Air Quality Division (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.;
- c. copies of the most recent month of records/logs specified in Specific Condition No(s). A.7. and A.8.; and

[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. Work Practice Requirements - The permittee shall not 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. Maintain tightly fitting cover, lids, etc, on all containers of VOC/OS when they are not being handled, tapped, etc.
- b. Prevent excessive air turbulence across exposed VOC/OS.
- c. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc. of VOC/OS so that it can be covered when not in use.
- d. All fittings, valve lines, etc. shall be properly maintained.
- e. All VOC/OS spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

[Rule 62-296.320(1)(a), F.A.C., Federally Enforceable State Operation Permit (FESOP) No. 1030215-003-AF]

10. Objectionable Odor - The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants from this plant which cause or contribute to an objectionable odor. Objectionable odor is defined as, "Any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be

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

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 62-296.320(2) and 62-210.200, Definitions-(Objectionable Odor), F.A.C.; Pinellas County Code, Section 58-178; FESOP No. 1030215-003-AF]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 – Spray Painting Operation

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

EU ID No.	Emission Unit Description
001	<i>Spray Painting Operation</i> – The spray painting area is located outside the shop at the northwest corner. An airless sprayer is used to apply low solvent paints for all coating operations. When the sprayer is not in use, the sprayer’s painting wand is placed in a sealed bath, which may contain solvents such as mineral spirits, kerosene, etc.

PERFORMANCE RESTRICTIONS

- A.1. Restricted Operation - The hours of operation are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.; FESOP No. 1030215-003-AF]

- A.2. Reasonable Precautions to Control Unconfined Particulate Matter (PM) Emissions from Painting Operations - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter (overspray) from painting operations*. At a minimum, the following precautions shall be taken by the permittee:
 - a. curtailing operations if winds are entraining the paint overspray, and
 - b. using a barrier to curtail emissions, if necessary.

In order to provide reasonable assurance that fugitive emissions from the painting operations are being reasonable controlled, visible emissions from the painting operations should not exceed 5% opacity. Exceedance of the 5% opacity 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 – See Specific Condition No. A.8. for associated recordkeeping requirements.)

[Rules 62-4070(3) and 62-296.320(4)(c), F.A.C.; FESOP No. 1030215-003-AF]

EMISSIONS STANDARDS

- A.3. Emission Limitation - Total Volatile Organic Compound (VOC) emissions from this spray painting operation (including surface preparation, painting, and equipment clean-up) shall not exceed 9.5 tons per any consecutive 12-month period*.

(*Permitting Note - Since all the HAPs used at this facility are expected to be VOCs, this limitation is also considered to synthetically limit HAP emissions below the Title V permitting thresholds in Chapter 62-213, F.A.C.)

[Rule 62-210.300(2)(b), F.A.C.; FESOP No. 1030215-003-AF]

- A.4. VOC Reasonably Available Control Technology (RACT) Emission Limiting Standards - This emission unit shall not discharge into the atmosphere VOCs in excess of 3.5 pounds/gallon of coating, excluding water, delivered to a coating application system.

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 – Spray Painting Operation

[Rule 62-296.513(2)(a)2. (VOC RACT – Surface Coating of Miscellaneous Metal Parts and Products), F.A.C.]

A.5. VOC RACT Specific Equipment Clean-up Procedure Exemption - All VOC emissions from solvent washing shall be considered in the emission limitation of Specific Condition No. A.4., unless the solvent is directed into containers that prevent evaporation into the atmosphere. Therefore, VOC emissions from the following are not included in the emission limitation of Specific Condition No. A.4., but are included to demonstrate compliance with Specific Condition No. A.3.:

- a. At the end of each day the painting applicator wand is used, disconnect the wand from the painting hose and place the wand in a sealed container.
- b. Clean-up solvents from the painting hose shall be directed into containers that prevent evaporation into the atmosphere.

[Rule 62-296.513(2)(c), F.A.C.; FESOP No. 1030215-003-AF]

A.6. Excess Emissions - Excess Emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.7. Daily and/or Monthly VOC Records – In order to document compliance with Specific Condition Nos. A.3. and A.4., the permittee shall maintain records which contain at a minimum the following:

a. Daily Records:

1. The rule number applicable to the operation for which the records are being maintained (i.e., Rule 62-296.513(2)(a)2., F.A.C. - Surface Coating of Miscellaneous Metal Parts and Products).
2. The application method and substrate type (i.e. spray painting on metal).
3. The amount and type of adhesive, coatings (including catalyst and reducer for multi-component coatings), and/or solvent used at each point of application.
4. The VOC content as applied for each coating (pounds VOC/gallon of coating, excluding water, as applied) and/or solvent (pounds VOC/gallon).
5. The date (month, day, and year) for each application of coating and/or solvent.
6. The amount of surface preparation, clean-up, and wash-up solvent (including exempt compounds) used and the VOC content of each (pounds VOC/gallon).

b. Monthly Records:

1. The calculated (based upon coating/solvent VOC content and usage) monthly total VOC emissions (lbs./month) for:
 - a. Coating spray painting usage.
 - b. Surface cleaning and equipment clean-up solvent usage.
 - c. Total facility (sum of a. and b. above).

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 – Spray Painting Operation

2. A calculation of the following:

- a. A cumulative facility total of VOC emissions for the most recent consecutive 12-month period, in tons.

Supporting documentation (e.g., MSDS sheets, "As Supplied" sheets, "As Applied" sheets, production records, etc.) shall be kept for each VOC containing material used in order to provide sufficient information to determine VOC emissions. Documentation for VOCs reclaimed, recycled or disposed, will use a mass balance method to determine net usage. All records shall include the Facility ID, Emission Unit ID, and Date (Month, Day, and Year) on each page. Monthly records shall be completed within 10 days of the end of the month. Daily records shall be completed within 5 business days. [Rules 62-4.070(3) and 62-296.500(2)(b), F.A.C.]

A.8. Reasonable Precautions Recordkeeping Requirement for Painting Operations - In order to demonstrate compliance with the reasonable precautions in Condition No. A.2., the permittee shall keep records of the periods that painting was curtailed or barriers erected due to winds entraining the paint overspray. [Rule 62-4.070(3), F.A.C., FESOP No. 1030215-003-AF]

A.9. Record Retention Requirement - Any records required by this permit shall be recorded in a permanent form suitable for inspection by the Pinellas County Air Quality Division (PCAQD) upon request, and shall be retained at the facility for a minimum of the most recent three (3) year period. [Rule 62-4.160, F.A.C.]