Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

FINAL PERMITS

PERMITTEE

Pop's Painting, Inc.
3805 Drane Field Road
Lakeland, FL 33811

Authorized Representative:
Mr. Mark Woods, President

Air Permit Nos. 1050226-009-AO
1050226-010-AC
Permits Expire: 02/12/2015 (AO)
06/30/2010 (AC)
Site Name: Pop's Painting, Inc.
Minor Air Operation and Construction Permits
Project Name: Sandblasting & Surface Coating Facility

These are the final air construction and operation permits, in one document, which authorize renewal of facility's operation permit (Project No. 1050226-009-AO), and after-the-fact construction of the shot-blast machine dust collector and establishment of sandblasting operation as a separate emissions unit (Project No. 1050226-010-AC). The proposed work will be conducted at Pop's Painting, Inc. (Standard Industrial Classification No. 3441). The facility is located in Polk County at 3805 Drane Field Road in Lakeland, Florida. The UTM coordinates are Zone 17, 399.4 km East, and 3097.6 km North. As noted in the Final Determination provided with the final permits, no changes or only minor changes and clarifications were made to the draft permits.

This final document is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-Wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, this document contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

These air pollution permits are 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 these permits. Project No. 1050226-010-AC is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of these final permits, 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 (Mail Station #35, 3900 Commonwealth Boulevard, 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Mara Grace Nasca February 11, 2010
Mara Grace Nasca 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 Determination, the Final Permits 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 February 12, 2010 to the persons listed below.

Mr. Mark Woods, President
Pop's Painting
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Mr. Chris Woods, Vice President
Pop's Painting
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Ms. Veronica Sgro, P.E.
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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.

Patricia Bluckett February 12, 2010
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Pop's Painting, Inc.

This facility is authorized to conduct sandblasting and surface coating operations. The permitted sources associated with this facility include six (6) emission units consisting of three (3) sand storage silos, surface coating (both indoor and open-air), a shot-blast machine and sandblasting. The permitted sources also include exempt/insignificant units.

The existing facility consists of the following emissions units.

Facility ID No. 1050226	
ID No.	Emission Unit Description
001	Sand Storage Silo No. 1 (North)
002	Sand Storage Silo No. 2 (West)
003	Surface Coating
004	Sand Storage Silo No. 3 (East)
005	Shot-Blast Machine

NOTES: *(1) The facility has an existing sandblasting operation, but this operation was not given an emissions unit number.*
(2) The facility also has a shot blast room (formerly EU ID No. 006), the air from which is processed utilizing a baghouse. The treated air is re-circulated back into the shot room from the baghouse. Therefore, it is not considered an emissions source.

Project Description and Affected/Proposed Emission Units

Project No. 1050226-009-AO authorizes the continued operation of the sandblasting and surface coating facility.

Project No. 1050226-010-AC modifies the following emissions unit.

Facility ID No. 1050226	
ID No.	Emission Unit Description
005	Shot-Blast Machine

Project No. 1050226-010-AC also establishes the following emissions unit.

Facility ID No. 1050226	
ID No.	Emission Unit Description
007	Sandblasting Operation

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

Exempt Emission Units/Activities

The following items at the facility are categorically exempt emission units per Rule 62-210.300(3)(a)33., F.A.C.:

- 40' x 12' walk-in oven powered by natural gas – two (2) 2.5 million Btu heater nozzles.

- 62′ x 8′ conveyor oven powered by natural gas – 4.5 million total Btu rated.
- 12′ x 4′ closet style oven powered by natural gas – 750,000 total Btu rated.

The following items at the facility are generically exempt emission units/activities per Rule 62-210.300(3)(b)1., F.A.C.:

- 20′ x 12′ powder coat paint booth.
- 10′ x 4′ manual powder coat booth.
- 8′ x 4′ manual powder coat booth.
- 6′ x 6′ manual, powder coat booth.
- 6′ x 4′ manual Teflon spray booth – less than six (6) gallons per day.
- Two (2) electric ovens.

{*Permitting Note: The permittee shall track the consumption/usage of natural gas and powder coat and Teflon spray from the insignificant units. Any VOC/HAP emissions generated from the exempt/insignificant unit/s shall be added to the facility VOC/HAP emissions and shall not exceed the Title V threshold at any time.*}

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 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 volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

PERMIT HISTORY/AFFECTED PERMITS

These permits modify and replace Construction Permit No. 1050226-007-AC and Operation Permit No. 1050226-008-AF.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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 to operate an emissions unit 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 Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

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

   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 document, 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 these permits 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 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 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.

   c. copies of the most recent compliance test reports required by Specific Condition No. B.3., if not previously submitted.

   d. copies of the most recent two months of records/logs specified in Specific Condition Nos. B.8., C.3. and E.2.

   [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.]

A. Facility-Wide Specific Conditions

A.1. Hours of Operation: The hours of operation are not limited (i.e., 8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.2. Unconfined Emissions of Particulate Matter: In addition to Condition 9. of Appendix C., the following reasonable precautions shall be followed:

a. All open-air sandblasting shall be conducted in such a manner as to avoid causing material to cross property lines.

b. The shot-blast baghouse shall be operated at all times when the shot-blast machine is operating.

c. Open-air sandblasting operation shall cease if wind conditions or other circumstances result in fugitive dust causing a public nuisance problem outside the plant property.

d. All surface coating shall be conducted in the designated paint room. All open-air surface coating shall be conducted in such a manner as to avoid causing overspray material to cross property lines. Open-air surface coating operation shall cease if wind conditions or other circumstances result in overspray causing a public nuisance problem outside the plant property.

e. The fans shall be operated at all times when the spray painting is conducted in the paint spray booth/paint room.

f. If public nuisance problems are created by fugitive dust, overspray and/or odors, the Department may require additional control measures, such as partial or total enclosure of open-air sandblasting or surface coating operations.

g. As an indicator that the reasonable precautions are adequate, visible emissions (VE) at the property line should not exceed 10%. If this value is exceeded, it shall not be considered a violation in and of itself, but may be a violation of the reasonable precautions required to be taken and/or may require additional precautions to be taken.

h. If necessary, the speed of the vehicular traffic on the unpaved road shall be reduced to a level minimizing the production of dust.

i. If necessary, further vehicular traffic dust control requirements may include the periodic application of non-potable water to the unpaved road surface and keep records of such applications.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1050226-007-AC]

A.3. Documentation: Supporting documentation (e.g. Material Safety Data Sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for the records required by this document shall be kept. At the permittee's option, "quantity purchased" may be reported to satisfy the requirement of "quantity used", provided no material is used which is not purchased; these logs may be based on the beginning and ending inventories, deliveries, shipments, etc.
[Rule 62-4.070(3), F.A.C.]

B. EU Nos. 001, 002 & 004 – Sand Storage Silos

This section of the document addresses the following emissions units.

ID No.	Emission Unit Description
001	Sand Storage Silo No. 1 (North)
002	Sand Storage Silo No. 2 (West)
004	Sand Storage Silo No. 3 (East)

All three silos receive sandblasting material pneumatically by truck at a maximum rate of 26.0 tons per hour. Emissions from the sand storage silos are each controlled by a Trinco Deluxe Model baghouse having a total cloth filtration area of 90 square feet.

PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity: The maximum allowable loading rate for each sand storage silo is 26.0 tons/hour.
[Construction Permit No. 1050226-007-AC]

EMISSIONS STANDARDS

B.2. Visible Emissions Indicator: As an indicator that the control devices (i.e. baghouses) are functioning properly, visible emissions from each baghouse should not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but may indicate that additional control methods or procedures are necessary.
[Rule 62-4.070(3), F.A.C.]

TESTING REQUIREMENTS

B.3. Visible Emissions Testing: In order to document compliance with Specific Condition No. B.2., the permittee shall test for visible emissions from each sand storage silo's baghouse annually during each federal fiscal year (October 1 – September 30).
[Rule 62-297.310(7)(a), F.A.C.]

B.4. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this document.
[Rule 62-297.310(7)(a)9., F.A.C.]

B.5. Test Method: Required tests shall be performed in accordance with the following reference method.

Method(s)	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 method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

B. EU Nos. 001, 002 & 004 – Sand Storage Silos

NOTIFICATION REQUIREMENTS

B.6. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.
{*Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*}
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

B.7. Test Reports: 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 document.
[Rule 62-297.310(8), F.A.C.]

B.8. Daily Logs: In order to demonstrate compliance with Specific Condition No. B.1., the permittee shall record for each silo loading the following:

a. Facility name, facility ID No., emission unit ID No. and description (e.g., Pop's Painting, 1050226, EU 001, Sand Storage Silo).

b. Date.

c. The amount of material transferred (received).

d. The start and end time of transferring material.

e. Calculate and record the actual hourly transfer rate of material, in tons/hour.

Daily records shall be completed within 3 business days. 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.]

C. EU No. 003 - Surface Coating

This section of the document addresses the following emissions unit.

ID No.	Emission Unit Description
003	The indoor surface coating operation is done in a Binks 49′ x 16′ spray paint booth with fans to pull air through filters and ducts and a Devillbus 13′ x 60′ spray booth. The outdoor (open-air) surface coating is applied to miscellaneous large metal parts utilizing three (3) airless applicator spray units. The spray applicators and spray guns are cleaned once a day with solvents. VOCs and HAPs from surface coating material and solvent/thinners are emitted uncontrolled. Particulate matter (PM) emissions are controlled from the paint spray booth by filters and from outdoor surface coating operations by work practice requirements.

PERFORMANCE RESTRICTIONS

C.1. Solvent Usage: Used solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations.
[Rule 62.4.070(3), F.A.C. and Construction Permit 1050226-007-AC]

EMISSIONS STANDARDS

C.2. Emissions Limit: Emissions from this emissions unit shall comply with the following:

Pollutant	**Emission Limit** (tons per any consecutive 12-month period)
VOCs (Volatile Organic Compounds)	90.0
Any Individual HAP (Hazardous Air Pollutant)	9.0
Total HAPs (Hazardous Air Pollutants)	23.0

{*Permitting Notes:*
- HAP emissions are a component of total VOC emissions.
- Spray booth emissions are combined with existing open-air surface coating emissions.
- The above limitations on VOCs, single HAP, and total HAPs will ensure that the emissions of this facility will not exceed the Title V permitting thresholds.
- Fans are installed to pull air through filters and ducts in the paint booth. Overspray emissions of PM in the paint booth are contained by installing panel filters at the inlet ducts of the fans.}

[Construction Permit 1050226-007-AC; Rules 62-4.070(3) and 62-210.200 - Definition of "HAP", F.A.C.]

RECORDS AND REPORTS

C.3. Monthly Log: The permittee shall keep monthly logs for the facility to document compliance with the VOC and HAP limitations of Condition No. C.2. The monthly logs shall include, but not be limited to, the following information:

a. Facility name, facility ID No., emission unit ID No. and description (i.e., Pop's Painting, 1050226, EU 003, Surface Coating).

b. Month, Year, and method used for records (usage or purchase).

VOC Monthly Records

c. The quantity (gallons) and VOC content (lbs/gal) of each VOC-containing material (surface coatings and solvents) used for the month.

d. The calculated monthly VOC emissions for each VOC-containing material, in pounds or tons (based upon material VOC content).

e. The calculated monthly total VOC emissions, in pounds or tons.

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

HAP Monthly Records

g. The quantity (gallons) and HAP content (lbs/gal) of each HAP-containing material (surface coatings and solvents) used for the month.

h. The calculated monthly HAP emissions for each individual HAP, in pounds or tons (based upon material HAP content).

i. The calculated monthly HAP emissions for total HAPs, in pounds or tons.

j. A cumulative total of the HAP emissions for each individual HAP for the most recent consecutive 12-month period, in tons.

k. A cumulative total of the HAP emissions for total HAPs for the most recent consecutive 12-month period, in tons.

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.]

D. EU No. 005 - Shot-Blast Machine

This section of the document addresses the following emissions unit.

ID No.	Emission Unit Description
005	The shot-blast machine uses a design maximum of 3,000 lbs/min of shot-blast material. Particulate matter emissions from the shot-blast machine are controlled by the Dust Hog Model SBD12-3 dust collector. Another previously used dust collector, Wheelabrator Corporation Machine No. 10 112-AC Model No. A-129131, can be used instead to control PM emissions from this unit, as both baghouses provide virtually same control efficiency.

EMISSIONS STANDARDS

D.1. Visible Emissions Indicator: As an indicator that the baghouse is functioning properly, visible emissions from the baghouse should not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but may indicate that additional control methods or procedures are necessary.
[Rules 62-4.070(3), F.A.C.]

E. EU No. 007 – Sandblasting Operation

This section of the document addresses the following emissions unit.

ID No.	Emission Unit Description
007	This operation is conducted outside and is utilized for processing large items that cannot be processed in the confined sandblasting space. The emissions from open-air sandblasting are minimized by applying reasonable precautions and work practice requirements.

PERFORMANCE RESTRICTIONS

E.1. Permitted Capacity: The sand throughput is limited to 4,000 tons per any consecutive 12-month period.
[Rule 62-210.200(PTE), F.A.C.; as requested in e-mail correspondence received 12/03/09]

RECORDS AND REPORTS

E.2. Monthly Log: The permittee shall keep monthly logs to document compliance with the throughput limitations of Specific Condition E.1. The logs shall include the following for each calendar month:

a. Facility name, facility ID No., emission unit ID No., and description (i.e., Pop's Painting, 1050226, EU 007, Sandblasting Operation).

b. Amount of sand used in sandblasting operation (tons/month).

c. Total amount of sand 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.]