



# 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

Turner Coatings, Inc.  
1865 Industrial Park Road  
Mulberry, FL 33860

Authorized Representative:  
Mr. Bob Turner, President

Air Permit No. 1050341-007-AO  
Permit Expires: 10/02/2017  
Site Name: Turner Coatings, Inc.  
Minor Air Operation Permit  
Project Name: Operation Permit Renewal

This is the final permit to renew Air Operation Permit No. 1050341-006-AO for a facility that sandblasts industrial metal beams and parts and then primes and paints them at Turner Coatings, Inc., (Standard Industrial Classification No. 3499). The facility is located in Polk County at 1865 Industrial Park Road in Mulberry, Florida. The UTM coordinates are Zone 17, 402.51 km East, and 3086.78 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.

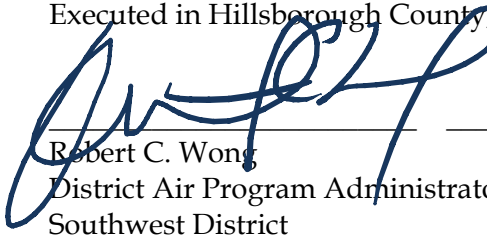
A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

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

  
Robert C. Wong  
District Air Program Administrator  
Southwest District

10/02/2012

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.

Mr. Bob Turner, President  
Turner Coatings, Inc.  
[bob.turner2@verizon.net](mailto:bob.turner2@verizon.net)

Ms. Sandy Turner  
Turner Coatings, Inc.  
[sandy.turnercoatings@verizon.net](mailto:sandy.turnercoatings@verizon.net)

Mr. Lynn Robinson, P.E.  
Southern Environmental Sciences, Inc.  
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Danielle Henry, Air Compliance Manager  
Southwest District, Florida Department of Environmental Protection  
[Danielle.D.Henry@dep.state.fl.us](mailto:Danielle.D.Henry@dep.state.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.

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)

## SECTION 1. GENERAL INFORMATION (FINAL)

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### FACILITY AND PROJECT DESCRIPTION

#### Existing Facility

This facility sandblasts industrial metal beams and parts and then primes and paints them. The facility includes an outside sandblasting area, two sand storage silos, and an outside painting area.

Facility ID No. 1050341	
ID No.	Emission Unit Description
002	Outside Sandblasting Area
003	Two Sand Storage Silos with Baghouses
004	Outside Painting Area
005	Air Compressor

#### Project Description and Affected Emission Unit

This project will also change the following emissions unit from a regulated to an exempt status.

Facility ID No. 1050341	
ID No.	Emission Unit Description
005	Air Compressor

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

#### Exempt Emission Units/Activities

One air compressor powered by a John Deere 188 maximum HP diesel engine (previously Emission Unit No. 005). This engine is mounted on a trailer with wheels and can be moved to various locations on the property. The engine was manufactured after April 1, 2006, but is considered a non-road engine and is not subject to New Source Performance Standard (NSPS) 40 CFR 60, Subpart IIII, Stationary Compression Ignition Internal Combustion Engines.  
[Rule 62-210.300(3)(a)35., F.A.C.]

### 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.

## SECTION 1. GENERAL INFORMATION (FINAL)

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- This facility is a synthetic non-Title V source for the pollutants particulate matter under 10 micrometers (PM<sub>10</sub>) , volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The emission limitations, restriction on hours of operation and the restriction on the type or amount of material stored or handled in this permit will ensure that the facility's PM<sub>10</sub>, VOC and HAP emissions will be below the threshold for a Title V source.

### PERMIT HISTORY/AFFECTED PERMITS

Replaces Permit No. 1050341-006-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 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 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 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"

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

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(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.8., if not previously submitted; and
- d. copies of the most recent month of records/logs specified in Specific Condition Nos. A.3., B.9., and C.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: 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. tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use;
- c. 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
- d. used cleanup solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.]

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

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10. General Standards: Unconfined Particulate Matter - 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. At a minimum, the following precautions shall be taken by the permittee:

- a. application of water to control emissions when and where necessary and practical;
- b. asphalt or concrete paving and maintenance of roads, parking areas, and yards where practical and as deemed necessary;
- c. removal of particulate matter from roads and other paved areas as needed to prevent re-entrainment, and from buildings or work areas;
- d. landscaping or planting of vegetation where practical and as deemed necessary; and
- e. posting and enforcing a 5 mph speed limit.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1050341-005-AC]

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## SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

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### A. EU No. 002 - Outside Sandblasting Area

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
002	The outside sandblasting area is used to sandblast items such as industrial metal beams and parts prior to painting. Unconfined PM emissions during sandblasting operations are controlled by taking reasonable precautions and work practice standards.

### PERFORMANCE RESTRICTIONS

**A.1. Restricted Operation** - Sandblasting operations are limited to 1,186 hours per any consecutive 12-month period.

[Construction Permit 1050341-005-AC]

**A.2. Unconfined Emissions of Particulate Matter (PM)** - the following reasonable precautions shall be followed to control unconfined PM emissions:

- install and maintain either a flag or windsock at the facility so that employees can visually observe the wind direction and the approximate wind speed for the work areas where outdoor sandblasting activities occur;
- train operators to be aware of the wind direction, approximate wind speed, and to monitor unconfined emissions during all sandblasting activities; and
- curtail and/or cease sandblasting operations during unfavorable wind conditions.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1050341-005-AC]

### RECORDS AND REPORTS

**A.3. Monthly Recordkeeping** - The permittee shall keep monthly logs for the sandblasting hours of operation to document compliance with the hours of operation limitations of Specific Condition No.

A.1. The logs shall include the following for each calendar month:

- facility name, facility ID No., emission unit ID No., and description (i.e., Turner Coatings, Inc., 1050341, EU 002, outside sandblasting area);
- sandblasting hours for the month (hours/month); and
- total sandblasting hours for the most recent consecutive 12-month period (hours/consecutive 12-month period).

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

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050341-005-AC]

## SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

### B. EU No. 003 – Two Sand Storage Silos

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
003	One sand storage silo has a capacity of 25 tons. The other sand storage silo has a capacity of 32 tons. They receive sandblasting material (sand) pneumatically by truck. The maximum amount of sand received is 3,000 tons per any consecutive 12-month period for both silos. Each silo has a baghouse to control particulate matter emissions.

### PERFORMANCE RESTRICTIONS

**B.1. Permitted Capacity** - The sand storage silos are limited to a combined, maximum throughput rate of 3,000 tons per any consecutive 12-month period.

[Rule 62-210.200, F.A.C. ("Potential to Emit"); Construction Permit 1050341-005-AC]

**B.2. Restricted Operation** - The hours of operation are not limited (8760 hours per year).

[Construction Permit 1050341-005-AC]

### EMISSIONS STANDARDS

**B.3. Visible Emissions** - In order to provide reasonable assurance that the PM emissions from filling the sand silos are being effectively controlled by the baghouse control devices, visible emissions from each silo exhaust vent shall not exceed 5% opacity.

[Rule 62-210.650, F.A.C.; Construction Permit 1050341-005-AC]

### TESTING REQUIREMENTS

**B.4. Visible Emission (VE) Testing Requirement** - During each federal fiscal year (October 1<sup>st</sup> to September 30<sup>th</sup>), each baghouse exhaust shall be tested to demonstrate compliance with Specific Condition No. B.3.

[Rules 62-297.310(7)(a)1. and 62-297.310(7)(a)4.a., F.A.C.]

**B.5. Test Requirements** - Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rule 62-297.310, F.A.C.]

## SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

### B. EU No. 003 – Two Sand Storage Silos

**B.6. Test Method** - Required tests shall be performed in accordance with the following reference method.

Method	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.

[Rule 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

**B.7. Operating Rate During Testing** - Visible emissions tests of each sand storage silo dust collector shall be conducted while loading the storage silo at a rate that is representative of the normal loading rate. The minimum loading rate shall be 25 tons per hour unless such rate is unachievable in practice. [Rule 62-4.070(3), F.A.C.]

### RECORDS AND REPORTS

**B.8. 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 permit. [Rule 62-297.310(8), F.A.C.]

**B.9. Recordkeeping** - The permittee shall keep monthly logs for each sand storage silo to document compliance with the throughput limitations of Specific Condition No. B.1. The logs shall include the following for each calendar month:

- facility name, facility ID No., emission unit ID No., and description (i.e., Turner Coatings, Inc., 1050341, EU 003, 25 ton sand storage silo);
- amount of sand received (tons/month) in each silo; and
- total amount of sand received in both silos for the most recent consecutive 12 -month period (tons/consecutive 12-month period).

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

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050341-005-AC]

## SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

### C. EU No. 004 – Outside Painting Area

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
004	The outside painting area is used to prime and paint the industrial metal beams and parts. The surface coating materials contain volatile organic compounds (VOC) and hazardous air pollutants (HAPs).

#### PERFORMANCE RESTRICTIONS

**C.1. Restricted Operation** - The hours of operation are not limited (8760 hours per year).  
[Construction Permit 1050341-005-AC]

**C.2. Unconfined Emissions of Particulate Matter** – the following reasonable precautions shall be followed to control unconfined PM emissions:

- install and maintain either a flag or windsock at the facility so that employees can visually observe the wind direction and the approximate wind speed for the work areas where outdoor surface coating activities occur;
- train operators to be aware of the wind direction, approximate wind speed, and to monitor unconfined emissions during all surface coating activities; and
- curtail painting operations during unfavorable wind conditions.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1050341-005-AC]

#### EMISSIONS STANDARDS

**C.3. Volatile Organic Compound (VOC) Emission Limitations** - VOC emissions from surface coating and cleanup solvent operations shall not exceed 20.0 tons per any consecutive 12-month period.  
[Rule 62-210.200, F.A.C. (“Potential to Emit”); Construction Permit 1050341-005-AC]

**C.4. Hazardous Air Pollutant (HAP) Emission Limitations** -HAP emissions from surface coating and cleanup solvent operations shall not exceed 9.9 tons in any consecutive 12-month period (or 9.9 tons per any 365 consecutive day period if daily recordkeeping is required (*see Specific Condition No. C.5.*)).  
[Rule 62-210.200, F.A.C. (“Potential to Emit”); Construction Permit 1050341-005-AC]

#### RECORDS AND REPORTS

**C.5. VOC and HAP Recordkeeping** - The permittee shall keep monthly logs to document compliance with the VOC and HAP limitations of Specific Condition Nos. C.3. and C.4. 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

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### SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

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#### C. EU No. 004 – Outside Painting Area

materials are used which are not purchased. 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., Turner Coatings, Inc., 1050341, EU 004, outside painting area);
- b. month, year, and method used for records (usage or purchase);
- c. monthly total quantity, in gallons, of each surface coating and solvent material used (solvent total is total minus amount collected for recycle or disposal);
- d. most recent consecutive 12-month period cumulative material usage rate (in gallons per consecutive 12-month period) for each surface coating and solvent material (based on c. above);
- e. percentage (%) by weight of VOC and each individual HAP for each surface coating and solvent material;
- f. monthly total of VOC emissions (tons/month) based on c. and e. above;
- g. most recent consecutive 12 -month period cumulative total VOC emissions (tons/consecutive 12 -month period) from surface coating and solvent material based on f. above;
- h. monthly total of HAP emissions (tons/month) based on c. and e. above; and
- i. most recent consecutive 12-month period cumulative total HAP emissions (tons/consecutive 12-month period) from surface coating and solvent materials based on h. above.

Daily Recordkeeping Trigger - If any month results in total HAP emissions exceeding 8.9 tons for the prior consecutive 12-month period (90% of the limitation in Specific Condition No. C.4.), the monthly records required above shall then be kept daily. These daily logs shall be kept until the most recent consecutive 12-month total (see C.5.i. above) equals or goes below 8.9 tons. Each day's records shall contain the HAP emissions for that day, in tons. Each day's records shall also sum the previous 11 months and the current month's cumulative daily HAP emissions, in tons. The "purchase" option shall not be used when daily logs are required.

The monthly logs shall be completed by the end of the following month. Daily records shall be completed within three (3) business days. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request. Supporting documentation (MSD sheets, purchase orders, emission factors, etc.) shall be kept for each VOC and HAP containing material.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050341-005-AC]