



# Florida Department of Environmental Protection

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Southwest District Office  
13051 North Telecom Parkway, Suite 101  
Temple Terrace, Florida 33637-0926

Noah Valenstein  
Secretary

## PERMITTEE

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

Air Permit No. 1050341-008-AO  
Air Operation Permit

Authorized Representative:  
Ms. Sandra G. Turner, Vice President

Turner Coatings, Inc.  
Polk County, Florida

## PROJECT

This is the final air operation permit, which authorizes the operation of Turner Coatings, Inc., which is a facility that sandblasts industrial metal beams and parts and then primes and paints them (Standard Industrial Classification No. 3499). This project is for the renewal of Operation Permit No. 1050341-007-AO. The facility is located in Polk County at 1865 Industrial Park Road in Mulberry, Florida. The UTM coordinates are Zone 17, 402.51 kilometers (km) East, and 3086.78 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements and Facility-wide Specific Conditions); Section 3 (Emissions Unit Specific Conditions); and 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.

**Permitting Authority:** Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the District Office. The Permitting Authority's physical address is: 13051 North Telecom Parkway, Suite 101, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 North Telecom Parkway, Suite 101, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813-470-5700.

**Petitions.** A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, [Agency\\_Clerk@dep.state.fl.us](mailto:Agency_Clerk@dep.state.fl.us). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must 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, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, 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

## FINAL AIR OPERATION PERMIT

---

determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (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, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; 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 permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the 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 permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**Effective Date:** This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

**Judicial Review:** Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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.

1050341-008-AO Effective Date: August 16, 2017  
Renewal Application Due Date: June, 17, 2022  
Expiration Date: August 16, 2022

Executed in Hillsborough County, Florida.



---

Pamala Vazquez  
Program Administrator  
Permitting & Waste Cleanup Program  
Southwest District



---

## SECTION 1. GENERAL INFORMATION

---

### FACILITY DESCRIPTION

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.

The existing facility consists of the following emissions units (EU).

EU No.	Emission Unit Description
002	Outside Sandblasting Area
003	Two Sand Storage Silos with Baghouses
004	Outside Painting Area

### EXEMPT EMISSION SOURCES/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, non-stationary 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)(b)1., F.A.C.]

### FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility is a synthetic non-Title V source for the pollutants particulate matter under 10 micrometers (PM10), 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 PM10, VOC and HAP emissions will be below the threshold for a Title V source.

### PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1050341-007-AO.

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

**ADMINISTRATIVE REQUIREMENTS**

1. Permitting Authority: The permitting authority for this project is the Southwest District of the Department of Environmental Protection (Department). The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection  
Southwest District Office  
Air and Solid Waste Permitting Program  
13051 North Telecom Parkway, Suite 101  
Temple Terrace, Florida 33637-0926  
Telephone: 813-470-5700  
E-mail: [SWD\\_Air\\_Permitting@dep.state.fl.us](mailto:SWD_Air_Permitting@dep.state.fl.us)

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

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection  
Southwest District Office  
Compliance Assurance Program  
13051 North Telecom Parkway, Suite 101  
Temple Terrace, Florida 33637-0926  
Telephone: 813-470-5700  
E-mail: [SWD\\_Air@dep.state.fl.us](mailto:SWD_Air@dep.state.fl.us)

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and 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: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.  
[Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

## **SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS**

7. **Renewal.** Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. To properly apply for an operation permit, the applicant shall submit the following:
- 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/>*);
  - the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
  - copies of the most recent compliance test reports required by Specific Condition No. B.8., if not previously submitted; and
  - copies of the most recent month of records/logs specified in Specific Condition Nos. A.3., B.9., and C.5.

[Rules 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

8. **Annual Operating Report (AOR):** The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) District Office. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C.

[Rule 62-210.370(3), F.A.C.]

*{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at [eaor@dep.state.fl.us](mailto:eaor@dep.state.fl.us).}*

### **FACILITY-WIDE REQUIREMENTS**

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:
- 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;
  - tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use;
  - 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
  - used cleanup solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations.

## **SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS**

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

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]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. EU No. 002 – Outside Sandblasting Area**

This section of the permit addresses the following emissions unit.

EU 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.  
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; 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:
  - a. 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;
  - b. train operators to be aware of the wind direction, approximate wind speed, and to monitor unconfined emissions during all sandblasting activities; and
  - c. 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 Log: 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:
  - a. facility name, facility ID No., emission unit ID No., and description (i.e., Turner Coatings, Inc., 1050341, EU 002, outside sandblasting area);
  - b. sandblasting hours for the month (hours/month); and
  - c. total sandblasting hours for the most recent consecutive 12-month period (hours/consecutive 12-month period).[Rule 62-4.070(3), F.A.C.; Construction Permit 1050341-005-AC]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### 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(PTE), F.A.C.; Construction Permit 1050341-005-AC]
- B.2. Restricted Operation: The hours of operation of are not limited (8760 hours per year).  
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; 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. Annual Compliance Tests: During each calendar year (January 1<sup>st</sup> to December 31<sup>st</sup>), each baghouse exhaust shall be tested to demonstrate compliance with the emissions standards for visible emissions.  
[Rule 62-297.310(8)(a)1, F.A.C.]
- B.5. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.  
[Rule 62-297.310(9), F.A.C.]
- B.6. Test Methods: Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.

[Rules 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.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

---

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

##### 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(10), F.A.C.]
- B.9. Monthly Log: 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:
- a. facility name, facility ID No., emission unit ID No., and description (i.e., Turner Coatings, Inc., 1050341, EU 003, 25-ton sand storage silo);
  - b. amount of sand received (tons/month) in each silo; and
  - c. 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. EMISSIONS UNIT SPECIFIC CONDITIONS

### 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 of are not limited (8760 hours per year).  
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; 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. Monthly Log: 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 materials are used which are not purchased. The monthly logs shall include, but not be limited to, the following information:
- facility name, facility ID No., emission unit ID No., and description (i.e., Turner Coatings, Inc., 1050341, EU 004, outside painting area);
  - month, year, and method used for records (usage or purchase);
  - monthly total quantity, in gallons, of each surface coating and solvent material used (solvent total is total minus amount collected for recycle or disposal);
  - 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);

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

---

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

- 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 Log 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 (SDS 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]