



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

Ritchie Bros. Auctioneers (America) Inc.
4000 Pine Lake Road
Lincoln, NE 68516

Authorized Representative:
Mr. Vic Pospiech, Senior Vice President

Air Permit No. 1050358-005-AO
Permit Expires: 03/12/2018
Site Name : Orlando Auction Facility
Minor Air Operation Permit
Project Name: Operation Permit Renewal

This is the final permit to renew Air Operation Permit No. 1050358-005 for an abrasive blasting and surface coating operation at the Orlando Auction Facility (Standard Industrial Classification No. 7699). The facility is located in Polk County at 700 Ritchie Road in Davenport, Florida. The UTM coordinates are Zone 17, 436.81 km East, and 3124.01 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

Kelley M. Boatwright 03/11/2013
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.

Vic Pospiech, Senior Vice President
Ritchie Bros. Auctioneers (America), Inc.
vpospiech@rbauktion.com

Laba Guebezai, Environmental Compliance Specialist
Ritchie Bros. Auctioneers (America), Inc.
lguebezai@reauction.com

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.

Aanna Bratley 03/12/2013
(Clerk) (Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This permit authorizes the continued operation of an abrasive blasting operation and two paint spray booths. Ritchie Bros. Auctioneers (America), Inc. (RBA) refurbishes and sells used industrial equipment including construction, transportation, mining, forestry, petroleum, and agricultural equipment. RBA refurbishes equipment by washing, abrasive blasting, and painting (mostly heavy construction equipment). Refurbishment operations generally occur throughout the year with increased activity 6 weeks prior to each auction.

Facility ID No. 1050238	
EU ID No.	Emission Unit Description
001	Abrasive Blast Booth
002	Paint Spray Booths #1 and #2

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 paint booths have a total (for both booths combined) of four (4) direct gas-fired make-up air heaters with a capacity of 5.9 MMBtu/hr each for a total of 23.8 MMBtu/hr (exempt from permitting in accordance with the provisions of Rule 62-210.300(3)(a)(34), F.A.C. (Categorical and Conditional Exemptions – Fossil fuel external combustion heating units)).

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 pollutants volatile organic compounds (VOC), hazardous air pollutants (HAPs) and particulate matter less than 10 micrometers (PM₁₀). The process rate and emission limitations in this permit will ensure that the facility's VOC, HAP and PM₁₀ emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1050358-004-AO.

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 - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance and Enforcement Section - Attention: AIR. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance and Enforcement Section – Attention: AIR
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

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.

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

[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. **Note: When reporting the tons of abrasive used for EU No. 001 Abrasive Blast Booth enter the amount of material added to the abrasive media hopper. When calculating the PM emissions use that number and multiply it by the number of times it was reused in the blasting process.**

[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 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 compliance test reports required by Specific Condition No. A.11., if not previously submitted; and
- d. copies of the most recent month of records/logs specified in Specific Condition Nos. A.12. and B.4.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

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

FACILITY-WIDE SPECIFIC CONDITIONS

EMISSIONS STANDARDS

9. VOC/HAP Emission Limitations - Facility-wide emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs), as defined in Rule 62-210.200, F.A.C., shall not exceed the following:

Pollutant	Emission Limitation
VOC	24.5 tons per any consecutive 12-month period
Individual HAP	9.9 tons per any consecutive 12-month period
Total HAPs	24.5 tons per any consecutive 12-month period

[Rule 62-210.200, F.A.C. ("Potential to Emit"); Construction Permit No. 1050358-001-AC]

RECORDKEEPING REQUIREMENTS

10. Recordkeeping for VOC and HAP Emission Limitations - In order to document compliance with VOC and HAP emission limitations in Specific Condition No. 9., the permittee shall maintain daily records of VOC and HAP emissions. The records shall include, at a minimum, the following information:

- facility name, facility ID No., (i.e., Ritchie Bros. Auctioneers (America), Inc., 1050358);
- month, day, and year;
- amount of each VOC and/or HAP containing material (by identification number) used daily in gallons or pounds (all records shall be in the same units) (gallons/day or pounds/day);
- monthly total VOC, individual HAP, and total HAP emissions (tons/month); and
- most recent consecutive 12-month total of VOC, individual HAP, and total HAP emissions (tons/consecutive 12-month period).

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.

Supporting documentation (MSD sheets, purchase orders, etc.) which includes sufficient information to determine VOC and HAP emissions shall be kept for each paint and solvent used.

If any month results in individual HAP emissions exceeding 90% of the emission limit in Specific Condition No. 9. (i.e., 8.9 tons of any individual HAP) for the most recent consecutive 12-month period as calculated in B.4.e. above, the facility shall compute a new consecutive 12-month total each day. Daily computation of the consecutive 12-month total for individual HAP emissions will continue until that total is below 90% of the individual HAP limit in Specific Condition No. 9. for one month. At that time monthly computation of the most recent consecutive 12-month individual HAP emissions can

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

return. The use of purchases as a proxy for usage is not allowed when computing daily consecutive 12-month totals.

Daily records shall be completed by the end of the following day. Monthly records shall be completed by the 10th day of the following month. These records shall be maintained at the facility for at least 3 years in a form suitable for inspection and be made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050358-001-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 - Abrasive Blast Booth

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

EU ID No.	Emission Unit Description
001	<p><u>Abrasive Blast Booth -</u></p> <p>An enclosed abrasive blast booth is used for the blasting operations. The machinery is blasted inside the booth using a Hoffman Blast Room Equipment, Inc. HDFT 4-72 cartridge pulse dust collector, floor type reclaim system, an elevator assembly, an air wash abrasive separator, and an abrasive blast material storage hopper. The blast material is cleaned and reused by the system. Waste material is deposited into drums at the dust collector. RBA uses Stauroilite as the blasting material. The abrasive blast material is stored in one ton totes under a covered area.</p>

PERFORMANCE RESTRICTIONS

A.1. Maximum Process Rate - The abrasive blasting operation is limited to 100.0 tons per any consecutive 12-month period of new abrasive material added to the abrasive media hopper. [Rule 62-210.200, F.A.C. ("Potential to Emit"); Construction Permit No. 1050358-001-AC; as requested by applicant in response email dated 3/7/2013]

A.2. Restricted Operation - The hours of operation are not limited (8760 hours per year). [Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1050358-001-AC]

A.3. Circumvention of Air Pollution Control Device - The cartridge pulse dust collector shall be in service and operating properly during all blasting operations. [Rule 62-210-650 (Circumvention), F.A.C.]

A.4. Visible Emissions (VE) Limitation - To ensure the cartridge pulse dust collector is properly maintained and operated, visible emissions from the dust collector exhaust vent shall not exceed 5%. [Rules 62-4.070(3) and 62-210-650 (Circumvention), F.A.C.]

EMISSIONS STANDARDS

A.5. Unconfined Particulate Matter Emissions - In addition to the general standards for unconfined particulate matter emissions (*see Section 4, Appendix C, paragraph 9*), the permittee shall take the following precautions:

- abrasive blast material shall be stored in "totes" located under a roof in a three sided structure; and
- abrasive blast material shall be loaded into the hopper(s) located under a roof in a three sided structure.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050358-001-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 - Abrasive Blast Booth

COMPLIANCE TESTING REQUIREMENTS

A.6. Visible Emissions Testing - During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions.

[Rule 62-297.310, F.A.C.; Construction Permit No. 1050358-001-AC]

A.7. Visible Emissions Compliance Test Requirements - Visible emissions compliance 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.]

A.8. Visible Emissions Compliance Test Methods - Required compliance 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]

A.9. Operation Rate During Testing - Testing of emissions to show compliance shall be conducted under normal operating conditions. The actual blasting rate (in tons/hour) for the test period shall be included in the test report for each test. Failure to submit the actual blasting rate for the test period and a copy of the daily log for the test day in the test report may invalidate the test and fail to provide reasonable assurance of compliance.

[Rules 62-4.070(3) and 62-297.310(2), F.A.C.; Construction Permit No. 1050358-001-AC]

NOTIFICATION REQUIREMENTS

A.10. 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.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 - Abrasive Blast Booth

RECORDKEEPING AND REPORTING REQUIREMENTS

A.11. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.

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

A.12. Recordkeeping for Abrasive Blasting Operation - In order to document compliance with Specific Condition No. A.1., the permittee shall maintain a monthly log of all new abrasive material added to the abrasive media hopper. The log shall include, at a minimum, the following information:

- a. facility name, facility ID No., emission unit ID No., and description (i.e., Ritchie Bros. Auctioneers (America), Inc., 1050358, EU No. 001, Abrasive Blast Booth);
- b. month and year;
- c. tons of new abrasive material added to the abrasive media hopper (tons/month); and
- d. most recent consecutive 12-month total of new abrasive material added to the abrasive media hopper (tons/consecutive 12-month period).

The monthly log shall be completed by the 10th day of the following month. These records shall be maintained at the facility for at least 3 years in a form suitable for inspection and be made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050358-001-AC; as requested by applicant in response email dated 3/7/2013]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

B. EU No. 002 Paint Spray Booths #1 and #2

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

EU ID No.	Emission Unit Description
002	<p><u>Paint Spray Booths # 1 and #2 -</u></p> <p>Two SBS Model # TEMDD 302590PDT-AMB paint spray booths are used to paint the equipment. They are located side by side with six exhaust stacks per paint booth (for a total of 12 stacks). Filters are the means of control of particulate matter from the paint booths. Volatile Organic Compound (VOC) emissions are uncontrolled.</p>

PERFORMANCE RESTRICTIONS

B.1. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1050358-001-AC]

EMISSIONS STANDARDS

B.2. Unconfined Particulate Matter Emissions – In addition to the general standards for unconfined particulate matter emissions (*see Section 4, Appendix C, paragraph 9*) paint filters must be installed in the paint spray booths during operation and be changed per manufacturer specifications.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050358-001-AC]

(Permitting Note: See Specific Condition Nos. 9 and 10 for VOC and HAP emissions standards and recordkeeping requirements which include the requirements for Paint Spray Booths #1 and #2.)