# Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

**PERMITTEE**

Ring Power Corporation
500 World Commerce Parkway
St. Augustine, Florida 32092

Authorized Representative:
Shane McLaughlin, Assistant Vice President

Air Permit No. 1090449-005-AO
Air Operation Permit

St. Johns County, Florida

**PROJECT**

This is the final air operation permit revises Permit No. 1090449-004-AO to remove the two spray painting booths as regulated emissions units at the facility. The facility asserts that these two spray painting booths meets the categorical exemption in Rule 62-210.300(3)(a)27., F.A.C from the requirement to obtain an air construction and Non-Title V operation permit. This final air operation permit authorizes the operation of an abrasive grit blasting booth at Ring Power Corporation which sells, services and repairs industrial equipment (Standard Industrial Classification No. 5082- Construction and Mining Machinery). The facility is located in St. Johns County at 500 World Commerce Parkway in St. Augustine, Florida. The UTM coordinates are Zone 17, 455.99 kilometers (km) East, and 3316.09 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Facility-Wide Conditions); Section 4 (Emissions Unit Specific Conditions); and Section 5 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 5 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 Department of Environmental Protection's Permitting Program in the Northeast District Office. The Permitting Authority's physical address is: 8800 Baymeadows Way W., Suite 100, Jacksonville, Florida 32256. The Permitting Authority's mailing address is: 8800 Baymeadows Way W., Suite 100, Jacksonville, Florida 32256. The Permitting Authority's phone number is 904/256-1700.

**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. 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 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.

1090449-005-AO Effective Date: August 11, 2016
Renewal Application Due Date: January 8, 2021
Expiration Date: March 9, 2021

Executed in Jacksonville, Florida

Richard S. Rachal III, P.G.
Permitting Program Administrator

## FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that the Air Permit package 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 following persons.

Shane McLaughlin, Assistant Vice President, Ring Power Corporation, (shane.mclaughlin@ringpower.com)
Brian Brown, Environmental Manager, Ring Power Corporation, (brian.brown@ringpower.com)
Thomas C.J. Drygas, President, D.E.I., Inc., (tom@dei-inc.com)

_____ August 11, 2016
Clerk Date

## FACILITY DESCRIPTION

Ring Power Corporation sells, services and repairs industrial/heavy equipment. The facility operates an abrasive blasting booth and two (2) paint spray booths.

Coatings and rust on the metal surfaces of the equipment are cleaned by garnet abrasive grit blasting. Particulate matter emissions from the abrasive blasting booth are controlled by a Torit dust collector system manufactured by Donaldson Torit, Model DFT 4-64 (or equivalent). The dust collector has 64 filter cartridges each with 254 square feet of filter area totaling 16,256 square feet with an air-to filter media ratio of 2.3:1, Clarcor ProTura # NF20000 (or equivalent) nanofiber technology material, a reverse pulse air jet cleaning unit, and a minimum $PM_{10}$ design control efficiency of at least 99.8%. System performance is monitored by a differential pressure gauge.

The industrial/heavy equipment from the Abrasive blasting booth is routed to either of the two paint spray booths where low solvent coatings are applied using air assisted or airless HVLP spray guns. The paint spray booths are each a Model SDT-60-XWPDT-S, side downdraft, dry filter spray booth manufactured by Global Finishing Solutions. Each paint spray booth is equipped with four (4) exhaust fans, each providing 18,750 cfm volumetric flow (75,000 cfm total). The fans draw air into the booth through GFS Wave Filters to remove ambient particulates form the inlet air. Heated recirculated air is supplied by a natural gas fired unit, Rupp Model CFA-233HT. The recirculation air is drawn into the heating units. Each have a capacity of 75,000 cfm, a maximum heat input of 4.86 MMBtu/hr, and provide a curing temperature of 160ºF.

The facility is a minor source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year and the potential emissions of hazardous air pollutants (HAP) are less than 10 tons per year of any one HAP and less than 25 tons per year of any combination of HAP's pursuant to Chapter 62-210, FAC.

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

| EU No. | Emission Unit Description |
|---|---|
| 001 | Abrasive Blasting Booth with a 38,000 CFM Reverse Pulse Jet Cartridge Dust Collection System |

The following emissions units/activities are exempt from the requirement to obtain an air construction permit and Non-Title V Operation permit:

| EU No. | Emission Unit /Activity | Rule |
|---|---|---|
| --- | 4.86 MMBtu/hr natural gas fired paint spray booth heating unit (an external combustion heating unit) | 62-210.300(3)(a)33., F.A.C. |
| --- | 4.86 MMBtu/hr natural gas fired paint spray booth heating unit (an external combustion heating unit) | 62-210.300(3)(a)33., F.A.C. |
| --- | Caterpillar, Inc. 1971 HP Diesel Engine, Model No. 35120B, Serial No. 1gz00407<br>*This engine for an emergency generator (standby power) located in the warehouse. It is a compression ignition, diesel engine with a displacement of 8.63 liters/cylinder. The Manufacture year is 2/22/2001.*<br>*The engine is subject to 40 CFR 63 Subpart ZZZZ National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. In accordance with the definitions of this subpart, the engine is an existing, emergency, stationary RICE.* | 62-210.300(3)(a)35., F.A.C. |

| | | |
|---|---|---|
| --- | Caterpillar, Inc. 1757 HP Diesel Engine, Model No. 3512, Serial No. cmc01482<br><br>*This engine for an emergency generator (standby power) located in the main building. It is a compression ignition, diesel engine with a displacement of 8.63 liters/cylinder. The Manufacture year is 4/1/2005.*<br><br>*The engine is subject to 40 CFR 63 Subpart ZZZZ National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. In accordance with the definitions of this subpart, the engine is an existing, emergency, stationary RICE.* | 62-210.300(3)(a)35., F.A.C. |
| --- | Volvo. 469 HP Diesel Engine, Model No. TAD1241GE, Serial No. wa-543798-0505<br><br>*This engine for an emergency generator (standby power) located in the F Building. It is a compression ignition, diesel engine with a displacement of 2.01 liters/cylinder. The Manufacture year is December/2005.*<br><br>*The engine is subject to 40 CFR 63 Subpart ZZZZ National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. In accordance with the definitions of this subpart, the engine is an existing, emergency, stationary RICE.* | 62-210.300(3)(a)35., F.A.C. |
| --- | Volvo. 469 HP Diesel Engine, Model No. TAD1241GE, Serial No. wa-544165-0750<br><br>*This engine for an emergency generator (standby power) located in the Paint Shop. It is a compression ignition, diesel engine with a displacement of 2.1 liters/cylinder. The Manufacture year is December/2005.*<br><br>*The engine is subject to 40 CFR 63 Subpart ZZZZ National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. In accordance with the definitions of this subpart, the engine is an existing, emergency, stationary RICE.* | 62-210.300(3)(a)35., F.A.C. |
| --- | Perkins. 230 HP Diesel Engine, Model No. GCB200, Serial No. 510004406<br><br>*This engine for an emergency generator (standby power) located in the C Building. It is a compression ignition, diesel engine with a displacement of 1.45 liters/cylinder. The Manufacture year is 6/1/2005.*<br><br>*The engine is subject to 40 CFR 63 Subpart ZZZZ National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. In accordance with the definitions of this subpart, the engine is an existing, emergency, stationary RICE.* | 62-210.300(3)(a)35., F.A.C. |
| --- | Perkins. 75 HP Diesel Engine, Model No. UO19752M, Serial No. 510004489<br><br>*This engine for an emergency generator (standby power) located in the Transportation Building. It is a compression ignition, diesel engine with a displacement of 1.1 liters/cylinder. The Manufacture year is 7/25/2005.*<br><br>*The engine is subject to 40 CFR 63 Subpart ZZZZ National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. In accordance with the definitions of this subpart, the engine is an existing, emergency, stationary RICE.* | 62-210.300(3)(a)35., F.A.C. |
| 002 | Two (2) Paint Spray Booths in parallel operation with inlet and outlet filters | 62-210.300(3)(a)27., 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.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Permitting Program, of the Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office, Permitting Program. The Permitting Authority's telephone number is (904) 256-1700.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance at: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Compliance Authority's telephone number is (904) 256-1700. The Compliance Authority's FAX number is (904) 256-1588.
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.]
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. [Rule 62-4.090, F.A.C.]

1. Unconfined Emissions of Particulate Matter: No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

   (a) Reduced speed for vehicular traffic.
   (b) Use of dust suppressants or wetting agents.
   (c) Use of paving or other asphaltic materials.
   (d) Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or wetting prior to sweeping.
   (e) Covering of trucks, trailers, frontend loader and other vehicles or containers to prevent spillage of particulate matter during transport.
   (f) Use of mulch, hydro seeding, grassing and/or other vegetative ground cover on barren areas to prevent or reduce particulate matter from being windblown.
   (g) Use of hoods, fans, filters and similar equipment to contain, capture and prevent particulate matter.
   (h) Enclosure or covering of conveyor systems.
   (i) Confining abrasive blasting where possible.
   (j) Sprinkling or otherwise wetting or conveyor systems.

   In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice and the degree of reduction of emissions expected from a particular technique or practice.

   [Rule 62-296.320(4)(c), F.A.C.]

2. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions elsewhere in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). If a special compliance test is required, the test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

   [Rule 62-296.320(4)(b)1., F.A.C.]

## Emissions Unit 001 – Abrasive Blasting Booth

**This section of the permit addresses the following emissions unit.**

| EU No. | Emission Unit Description |
|---|---|
| 001 | **Abrasive Blasting Booth with a 38,000 CFM Reverse Pulse Jet Cartridge Dust Collection System**<br>*Description:* Abrasive blasting of industrial/heavy equipment metal surfaces using garnet as abrasive blast material.<br>*Capacity:* The abrasive blasting booth is rated at a maximum process rate of no more than 200 tons of abrasive blast media per year.<br>*Controls:* The abrasive blasting operation shall be equipped with a Torit dust collector system manufactured by Donaldson Torit, Model DFT 4-64 (or equivalent). The dust collector has 64 filter cartridges each with 254 square feet of filter area totaling 16,256 square feet with an air-to filter media ratio of 2.3:1, Clarcor ProTura # NF20000 (or equivalent) nanofiber technology material, a reverse pulse air jet cleaning unit, and a minimum $PM_{10}$ design control efficiency of at least 99.8%. System performance is monitored by a differential pressure gauge.<br>*Stack Parameters:* The stack has a design height of 10 feet above ground level and is rectangular shaped with 1.5 feet by 2.0 feet cross-sectional dimensions. The exit temperature is approximately 80º F with an estimated design volumetric flow rate of 38,000 actual cubic feet per minute (acfm). |

*Permitting note: This emissions unit is subject to Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards*

### PERFORMANCE RESTRICTIONS

1. Method of Operation- Maximum Charging Rate: The estimated maximum throughput to the abrasive blasting booth is 200 tons per year of abrasive blasting media.

   [Rule 62-210.200(PTE), F.A.C., Application No. 1090449-004-AO]

2. Method of Operation – Blasting Media: The abrasive blasting media shall consist of garnet blast media or similar material.

   [Application No. 1090449-004-AO]

3. Restricted Operation: The hours of operation of are not limited (i.e. 8,760 hours per year).

   [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

4. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly.

   [Rule 62-210.650, F.A.C.]

### EQUIPMENT

5. Air Pollution Control Equipment: The permittee shall operate a dust collector for the control of particulate matter emissions from the abrasive blasting booth. The dust collector system shall consist of a dust collector equipped with ProTura (or equivalent) cartridge filters. The dust collector shall have a minimum design control efficiency of at least 99.8% and achieve the emission limits specified in this permit subsection.

   The dust collector shall be on line, functioning properly, and in operation in accordance with the manufacturer's recommendations whenever the abrasive blasting booth is in operation.

   [Rule 62-4.070, F.A.C. - Reasonable Assurance, Rule 62-210.300(2)(a), F.A.C., Application No. 1090449-004-AO]

## EMISSIONS STANDARDS

6. Emission Standards – Visible Emissions: The emission unit shall meet the General Visible Emissions Standard stated in **Facility Wide Condition 2**.

   [Rule 62-4.070, F.A.C. - Reasonable Assurance]

## TESTING REQUIREMENTS

7. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit, unless the Department obtains other information sufficient to demonstrate compliance. The owner or operator of the emissions unit shall provide a report on the results of said tests to the Department in accordance with the provisions of Rule 62-297.310(10), F.A.C.

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

8. 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.]

9. 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-4 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, and 62-296.320(4)(b)4.a., F.A.C.; and Appendix A-4 of 40 CFR 60]

## RECORDS AND REPORTS

10. 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.]