



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT ISSUANCE

In the Matter of an Application
for Permit by:

DEP File No.: 0830084-003-AF
County: Marion

Mr. Michael E. Gelinas, Vice President Operations
Flair Manufacturing
4647 S.W. 40th Avenue
Ocala, Florida 34474-1402

Enclosed is Federally Enforceable State Operation Permit Number 0830084-003-AF for the operation of the metal product manufacturing facility located at the above address, issued pursuant to Section 403.087, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tampa, Florida.

Sincerely,

David Zell
Air Permit Engineer

DRZ/
enclosure

Copy furnished to:

W. Daniel Phelps, P.E., Delta Environmental Consultants
(8186-88 Woodland Center Blvd., Tampa, FL 33614)

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 12-29-97 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED,
on this date, pursuant to Section 120.52(7),
Florida Statutes, with the designated Department
Clerk, receipt of which is hereby acknowledged.

Patricia A. Hubert 12-29-97
(Clerk) (Date)



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

PERMITTEE:

Flair Manufacturing
4647 S.W. 40th Avenue
Ocala, Florida 34474-5799

Effective Date: 12/29/2997
Permit No: 0830084-003-AF
County: Marion
Expiration Date: 12/29/2002
Project: Metal Products
Fabrication w/Surface Coating

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and Chapter 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the Florida Department of Environmental Protection:

A Federally Enforceable State Operating Permit (FESOP) for an existing metal fabrication facility which manufactures various types of compressed air dryers. Production process steps include cutting, welding, sandblasting, surface coating, curing and assembly.

The surface coating operations are divided into three process areas. In the main manufacturing building volatile organic compound (VOC) based coatings are applied to sandblasted fabricated workpieces in one of two coating lines (Large Spray Painting Area and Small Spray Painting Area). In another building teflon coatings are applied to sandblasted fabricated workpieces. These processes and equipment are described in more detail below.

Large Spray Painting Area

In this area large fabricated workpieces are first sandblasted in Room # 1 (Large Empire Sandblast Room) using an Empire Abrasive Equipment Corporation, Model 1320-10 sandblaster equipped with a CP Environmental Filters, Inc. Model 84NF042 pulse jet dust collector to control particulate matter emissions. From the sandblasting room the workpieces are then moved into the Large Spray Paint Booth (a modified downdraft Binks Model 30-1800 spray booth). This booth is equipped with filter arrestors to collect overspray and a fan to exhaust fumes generated inside the booth out through a 45 foot tall exhaust stack. This area also has an associated spray gun cleaning station and a free standing Large Spray Paint Mixing Booth which is independently equipped with a fan to exhaust fumes out of a 27 foot tall vent stack. On infrequent occasions (approximately 3 times per year) when fabricated workpieces are too large to fit into the booths, sandblasting and spray painting are done on a slab outside the building in the partially enclosed Large Assembly Area (duration is generally one day each of sandblasting and spray painting per event).

PERMITTEE:
Flair Manufacturing

Permit No.: 0830084-003-AF
Project: Metal Fabrication

Description: (continued)

Small Spray Painting Area

In this area smaller fabricated workpieces are first sandblasted in Room # 2 (Small Delong Sandblast Room) using a Delong Model SB-5 sandblaster equipped with a reverse pulse jet dust collector to control particulate matter emissions. From the sandblasting room the workpieces are then moved into the Small Spray Paint Booth (a backdraft type Binks Model 30-4204 spray booth). This booth is equipped with filter arrestors to collect overspray and a fan to exhaust fumes generated inside the booth out through a 45 foot tall exhaust stack. This area also has an associated spray gun cleaning station and a free standing Small Spray Paint Mixing Booth which is independently equipped with a fan to exhaust fumes out of a 27 foot tall vent stack.

Teflon Coating Area

In this area fabricated workpieces are first sandblasted in the Teflon Sandblaster using a Delong Model SB-2 sandblaster equipped with a Dollinger Dust Collector - Zero Air Cartridge Fabric Filter to control particulate matter emissions. From the sandblasting room the workpieces are then moved into the Teflon Coating Booth and then to a curing area (included for process description purposes only - the Teflon Coating Booth and curing area are exempt from permitting on the basis that there is no VOC contained in the teflon coating).

Note: Emission Point identification, for the purposes of emission inventory and compliance tracking, assigns E.U. 001 to the two (2) spray painting booths and E.U. 002 to the three (3) sandblasters.

List of Exempt and Insignificant Activities (for information only)

Exempt Activities (Rule 62-210.300, F.A.C)

- Teflon Coating
- Teflon Curing
- Welding

Insignificant Activities (Rule 62-4.040(b), F.A.C.)

- Recycle Still (closed loop system to recycle spent solvents)
- Evaporator (used to volatilize contaminated water)
- Satellite Drums (used to collect paint bottoms for recycling)
- Parts Washers
- 1000 Gallon Propane Tank
- Glove Box Sandblast Unit (small sandblast unit equipped with a dust collector which vents inside the manufacturing building)

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PERMITTEE:
Flair Manufacturing

Permit No.: 0830084-003-AF
Project: Metal Fabrication

Specific Conditions:

Location: 4647 S.W. 40th Avenue, Ocala (west of I-75)

UTM: 17-384.5 E 3224.0 N

Facility ID No: 0830084

Emission Unit ID Nos:
Spray Booths - 001
Sandblasters - 002

Note: Please reference Permit No. and Emission unit ID No. in all correspondence, test report submittals, applications, etc.

Replaces Permit No.: Construction permit 0830084-002-AC (issued under the name Pneumatic Products Corporation)

Title V Applicability Note: Based upon the level of potential VOC and HAP emissions from this facility at worst case (i.e. 8,760 hours per year) operation, which are well below the Title V major source levels, this facility is considered to be a natural minor non-Title V source.

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Specific Conditions:

A. Spray Paint Booths (E.U. 001)
Large Paint Spray Booth (LPSB) &
Small Paint Spray Booth (SPSB)

Operation and Emission Limitations

- A1. Both the LPSB and SPSB are permitted for continuous operation (i.e. 8,760 hours per year).
[Construction permit 0830084-002-AC]
- A2. Total emissions of volatile organic compounds (VOCs) (including any clean-up solvents) shall not exceed 37.1 tons per any 12 consecutive month period.
[Construction permit 0830084-002-AC]

PERMITTEE:
Flair Manufacturing

Permit No.: 0830084-003-AF
Project: Metal Fabrication

Specific Conditions:

A3. Total emissions of Hazardous Air Pollutants (HAPs) (as defined in Rule 62-210.200, F.A.C.) from this facility shall not exceed 5.0 tons per any 12 consecutive month period*.
[Permit 0830084-002-AC, and as requested in FESOP application dated 09/16/97 to establish the facility as a "non-Title V" source]
(* Note: Based upon the nature of the coating materials used at this facility and past usage data, actual emissions of HAPs are not expected to exceed even 50% of the above limit. On this basis reasonable assurance of compliance with this limit shall be provided by documentation of compliance with the total VOC limitation and no separate HAP recordkeeping will be required.)

A4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. (See also Specific Condition No. C3.) [Rule 62-296.320(2), F.A.C.]

A5. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of paints and solvent materials. All solvents from solvent washings shall be directed into containers that prevent evaporation into the atmosphere. [Rule 62-296.320(1), F.A.C.]

A6. The permittee shall not circumvent any air pollution control device or allow the emissions of air pollutants without the applicable spray booth air pollution control device (i.e. spray booth filter arrestors) in place and operating properly. (See also Specific Condition Nos. A8. and C3.) In order to provide reasonable assurance that the overspray from each paint booth is being controlled by the paint arrestor filters, the visible emissions from each paint booth exhaust stack should not exceed 5% opacity. If the exhaust stack visible emissions exceed 5% opacity, the Department will not consider this a violation, but an indication that additional controls may be required.
[Rules 62-210.650, and 62-296.310(3), F.A.C.]

Compliance Documentation Recordkeeping Requirements

A7. In order to document compliance with the emission limitations of Specific Condition Nos. A2. and A3, the permittee shall establish and maintain records of usage of VOC containing coatings, solvents and cleaners. A monthly summary log shall be maintained, and shall include at least the following information:

(continued)

PERMITTEE:
Flair Manufacturing

Permit No.: 0830084-003-AF
Project: Metal Fabrication

Specific Conditions:

A7. (continued)

- A. the month
- B. monthly total usage (*gallons*) for each VOC containing material and the resulting (calculated based on VOC content) VOC emissions (*pounds VOC*),
- C. total cumulative VOC emissions for the most recent 12 consecutive month period (*tons/12 consecutive month period*).

The Material Safety Data Sheets (MSDS), EPA "As Supplied" data sheets, purchase orders, etc. shall be kept for each VOC-containing material used in order to provide sufficient information to document how emissions were calculated and provide the necessary information to calculate HAP emissions should that be requested. Documentation for VOC/HAPs reclaimed, recycled or disposed, will use a mass balance method to determine net usage. All of the above records shall be retained for at least two years, and kept on site and made available to the Department upon request.

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

A8. In order to document compliance with Specific Condition Nos. A6. and B3. and C3., the permittee shall maintain a record of the following:

- A. the date and time of all spray booth filter arrestor replacements;
- B. the date, time, and duration of all occurrences of sandblasting or spray painting of workpieces outdoors, along with an explanation of why each was necessary.

These records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained for at least a two year period. [Rule 62-4.070(3), F.A.C.]

B. Sandblasting Operations (E.U. 002)

Large Empire Sandblast Room
Small Delong Sandblast Room
Teflon Sandblaster

Operation and Emission Limitations

B1. The three sandblast booths are each permitted for continuous operation (i.e. 8,760 hours per year).
[Construction permit 0830084-002-AC]

PERMITTEE:
Flair Manufacturing

Permit No.: 0830084-003-AF
Project: Metal Fabrication

Specific Conditions:

B2. Visible emissions from the exhaust of each sandblasting dust collector shall not exceed 5% opacity.
[Rule 62-297.620(4), F.A.C.]

B3. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.310(3), 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. (See also *Specific Condition Nos. A8. and C3.*)
[Rule 62-296.310(3), F.A.C.]

Compliance Testing Requirements

B4. Each of the three (3) sandblaster exhaust stacks shall be tested for visible emissions within the 60 day period prior to submittal of an operation permit renewal application. A test report shall be submitted to the Air Compliance Section of the Southwest District Office of the Department within 45 days after the tests are completed.
[Rules 62-297.310(7)(a)3. and 62-297.310(8)(b), F.A.C.]

B5. Compliance with the visible emission limitations of Specific Condition No. B2. shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-204.800, F.A.C. The minimum requirements for stationary point source emissions test procedures and reporting shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.
[Rule 62-297, F.A.C.]

B6. The visible emissions test shall be conducted by a certified observer and be a minimum of thirty (30) minutes in duration. The test observation period shall be during active sandblasting operations and include the period during which the highest opacity can reasonably be expected to occur.
[Rule 62-297.310(4)(a)(2), F.A.C.]

B7. The permittee shall notify the Compliance Section of the Southwest District Office of the Department at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted.
[Rule 62-297.310(7)(a)9., F.A.C.]

PERMITTEE:
Flair Manufacturing

Permit No.: 0830084-003-AF
Project: Metal Fabrication

Specific Conditions:

C. General Requirements

C1. A part of this permit is the attached 15 General Conditions.
[Rule 62-4.160, F.A.C.]

C2. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, or any other requirements under federal, state or local law.
[Rule 62-210.300, F.A.C.]

C3. Sandblasting and/or spray painting of workpieces outside of the sandblaster rooms and spray booths shall only be allowed in the special and infrequent instance that the workpiece is too large to fit into the large sandblaster or large spray booth. If this occurs on a frequent basis (i.e more than once a month), then provisions shall be made to enlarge the large sandblasting room and/or large spray booth to accommodate larger workpieces. Outdoor sandblasting and/or spray painting shall be immediately discontinued if wind/weather conditions result in fugitive particulate or paint overspray emissions which visibly cross the plant property line, or if odor emissions reach objectionable levels in occupied areas off of plant property. (See also Specific Condition No. A8.)
[Permit 0830084-002-AC, & Rules 62-4.070(3), & 62-296.310(3), F.A.C.]

Operation Permit Renewal Application

C4. At least two applications for an operation permit renewal shall be submitted to the Air Program of the SW District Office of the Dept. within 45 days of testing or at least 180 days prior to the expiration date of this permit, whichever occurs first. To properly apply for an operation permit, the applicant shall submit:

- A. the appropriate operation permit application form (DEP Form No. 62-210.900(1) *Application for Air Permit - Long Form*);
- B. the appropriate application fee;
- C. a copy of the sandblaster visible emissions compliance test reports (*Specific Condition No. B4.*);
- D. copies of the monthly VOC log (*Specific Condition No. A7.*) for the most recent 2 months.

[Rules 62-4.090(1), 62-210.300(2), and 62-210.900, F.A.C.]

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

FOR *W.C. Thomas, P.E.*
W.C. Thomas, P.E.
District Air Program Administrator

ATTACHMENT - GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

GENERAL CONDITIONS:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

GENERAL CONDITIONS:

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.



RECEIVED
OCT 03 1997

Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

8186-88 Woodland Center Blvd.
Tampa, FL 33614
813/249-5311
FAX: 813/249-5453

~~RECEIVED
SEP 19 1997~~

~~Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____~~

September 18, 1997

Southwest District
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Attention: Mr. Jerry Kissel
Air Permitting Supervisor

Subject: Air Operation Permit Application
Flair Manufacturing
4647 S.W. 40th Avenue
Ocala, Marion County, Florida
Permit No: 0830084-002-AC
Delta Project No. B096-018

Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

OCT 03 1997

RECEIVED

0830084-003-AF

Dear Mr. Kissel:

On behalf of Flair Manufacturing (formerly referred to and permitted as Pneumatic Products Corporation), Delta Environmental Consultants, Inc. submits this Air Operation Permit Application for the above referenced facility. As instructed in the Draft copy of the Notice of Intent, enclosed herewith are two hard copies of the FDEP long form No. 62-210.900, two copies of the diskette containing the Electronic Submission of Application (ELSA) and associated computer files, and a check in the amount of the amount of \$1,000.00 to cover the processing fee.

Additionally, included within the application (Appendix C and D) are copies of the actually VOC logs for the months of July, August, through current day September 1997, as well as the rolling inventory sheet. A copy of the visible emissions compliance test results and letter report which was sent to Mr. Thomas W. Ellison, Jr. on September 8, 1997 is included as Appendix D.

As referenced above, please note there has been a change in the permittee name on the permit application. The after the fact air construction permit application was filed under the ownership name of Pneumatic Products Corporation. However, due to ownership changes the facility in it's entirety is now identified as Flair Manufacturing. Therefore, the change in the facility name more accurately reflects the current ownership of the facility.

Mr. Jerry Kissel
September 18, 1997
Page 2

Should there be any questions concerning this application, please contact Mr. Steve Turrentine of Flair Manufacturing at (352) 873-5140.

Sincerely,

DELTA ENVIRONMENTAL CONSULTANTS, INC.



LuAnne Thomas, E.I.
Project Engineer

LWT/pac

Enclosures

cc: Mr. Steve Turrentine, Flair Manufacturing (with enclosures)
Mr. Michael Galinas, Flair Manufacturing (without enclosures)