

# Ram-Lin

2136 East Fourth Street  
Orlando, Florida 32824  
407-851-1144  
Fax: 407-857-2990

RECEIVED

FEB 19 2013

DIVISION OF AIR  
RESOURCE MANAGEMENT

February 14, 2013

Mr. Jeff Koerner, Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 5500  
Tallahassee, FL 32399-2400

**RE: Petition for Variance to §403.201 F.S and Chapters 62-110.104  
F.A.C. and 62-296.513 F.A.C.**

Dear Mr. Koerner,

Central Florida Custom Trailers, Inc. (d.b.a. Ram-Lin) is a metal fabrication and finishing company located in Orange County Florida. We have applied for an after-the-fact air construction permit to operate this facility and our painting process is subject to Chapter 62-296.513 F.A.C., Reasonable Available Control Technology (RACT) Surface Coating of Miscellaneous Metal Products.

We are currently using all RACT compliant paints with the exception of one coating used as part of a military contract. This non-compliant coating is a chromate ordinance wash primer and is required as part of this Department of Defense (DOD) contract. A suitable compliant substitute is not available.

Ram-Lin has determined, with outside expert assistance from our consultant and Orange County Environmental Protection Division (EPD), that to comply with the applicable RACT we must apply for a variance through the Florida Department of Environmental Protection (FDEP) in accordance with §403.201 F.S and Chapter 62-110.104 F.A.C. Our consultant also indicated that they have applied for and obtained a variance for this same coating for another military contractor located in Orange County as far back as 1995. It appears a suitable substitution has not been formulated.

### **Background**

Ram-Lin uses a product called "Metal Wash Primer" (Sherwin Williams DOD-P-15328D) on military decks (large flatbed trailers) as required by the contract through their DOD contractor. In the construction permit application submitted to Orange County Environmental protection Division (EPD), we indicated that the maximum annual emissions from this non-compliant coated would be 0.29 tons/yr of VOC. If a compliant coating was available with a VOC content of 3.5 lbs VOC/gal, the maximum emission rate would be 0.175 tons/yr. The use of this non-compliant coating results in a difference of 0.115 tons/yr of VOC or a maximum of 230 pounds.

### **Petition for Variance 62-110.104 FAC**

#### *(a) The petitioner's name and signature*

- Central Florida Custom Trailers, Inc. d.b.a. Ram-Lin
- David McCorkle, President
- Letter is signed by the president

*(b) The statute or rule from which the variance is sought*

- Rule 62-296.513(2)(a)2. which reads; 3.5 pounds per gallon of coating (0.42 kilograms per liter), excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 194 degrees Fahrenheit (90 degrees Celsius).

*(c) Facts showing that a variance should be granted for one of the reasons set forth in Section 403.201 Florida Statutes.*

- 403.201(1)(b) Compliance with the particular requirement or requirements from which a variance is sought will necessitate the taking of measures which, because of their extent or cost, must be spread over a considerable period of time.

The cost to control the additional 230 pounds of VOC/yr caused from the use of this non-compliant coating would require the use of a VOC control device. The most widely used VOC control device for spray paint booths, where there is a high air volume and very low VOC concentration, is a Zeolite concentrator followed by a regenerative thermal oxidizer (RTO). The estimated cost to purchase and install such a control device on a 12,000 CFM spray booth is estimated at \$1.5 million dollars. Operating costs are not included in this estimate and are approximately \$250,000.00 per year for maintenance, natural gas and electricity.

The DOD contracts are essential to the operation of Ram-Lin who must conduct their business in strict accordance with the military specifications that requires wash coating of military parts prior to

painting with a RACT compliant coating. Ram-Lin has contacted the contracts administrator who assures us that there is no suitable replacement for this ordinance wash primer.

Ram-Lin is categorized as a "small business" under its DOD procurement programs, and the cost to add pollution control for 230 pounds of VOC per year would be cost prohibitive and not financially feasible for the company.

*(d) The time period for which the variance is sought including the reason and fact supporting this time period.*

Ram-Lin requests that the variance sought in this petition apply for the maximum period (2 years) permitted under Florida law until either the contract is revised by the DOD or a suitable wash primer is reformulated to a RACT compliant coating. It is our understanding after reasonable enquiry by our consultants at GSE and our contracts representative that a suitable compliant wash primer is not forthcoming. Therefore, this variance is required for Ram-Lin to continue to fulfill its contractual obligation and remain a contractor in good standing to obtain future work.

*(e) The requirements that the petitioner can meet, including the date and the requirements will be met.*

Ram-Lin is currently using all RACT compliant coatings with the exception of this wash primer for which this variance is sought. An application for an after-the-fact air construction permit has been submitted to the EPD and is currently under review. The application

identifies this non-compliant coating and the need to request this variance, so it can get incorporated into a permit condition.

Our employees have received training under 40 CFR Part 63 Subpart HHHHHH. This facility is a minor source of VOC with potential emissions of approximately 48.2 tons/yr and HAP emissions of approximately 2.18 TPY. Particulate emissions have been calculated at 2.2 tons/yr after controls. We are in the process of implementing the RACT record keeping requirements using a spreadsheet specifically prepared for our paints.

We have requested through the contracts administrator that once a RACT compliant wash primer is acceptable to the DOD for this and other contracts, we will notify the FDEP and EPD and discontinue the use of the current coating.

*(f) The steps or measures that the petitioner is taking to meet the requirements from which variance is sought. If the request is pursuant to paragraph 403.201(1)(b), Florida Statute, the petitioner shall include a schedule when compliance will be achieved.*

Ram-Lin uses a variety of paint colors, each with a VOC coating less than the allowable limit. These lower VOC paints offset the small amount of VOC generated by the non-compliant wash primer. The difference in VOC is 230 pounds/yr if the wash primer were a compliant coating. This additional 230 pounds of VOC is easily offset by the compliant paints resulting in the overall average VOC emission rate less than the allowable by RACT.

As stated above, we are working with our contracts administrator to find a RACT compliant coating. A letter from our contracting administrator is included in Attachment 1.

*(g) The social, economic and environmental impacts on the applicant and on residents of the area and of the state if the variance is granted.*

If the variance is granted, there will be no measureable impact to the air quality from 230 pounds of extra VOC nor will this impact Orange County's status as a maintenance area for ozone. It will secure the well-paying jobs of the skilled labor force that has been severely impacted in Central Florida since the 2008 economic crash. It will allow Ram-Lin to pursue additional work from the DOD for which we are uniquely qualified and provide economic stability to our workers and stock holders as well as provide additional skilled labor jobs in the future as additional work is obtained from military contracts.

*(h) The social, economic and environmental impacts on the applicant and on residents of the area and of the state if the variance is denied.*

If the petition were to be denied, Ram-Lin would not be able to fulfill its contractual obligation to the DOD resulting in monetary penalties and loss of current and future work and contracts. This would limit our business to private sector work which is very limited in this current economic climate.

If the DOD work could not be continued and if future contracts could not be obtained because we could not meet the DOD specifications, jobs would be lost as there is not sufficient private sector work in central Florida at this time. The impact of loss jobs on families, mortgages and

**ATTACHMENT 1**  
**LETTER FROM DOD**

other private loans would be real and not justifiable for 230 pounds of VOC emissions.


### **Fee and Attachments**

In accordance with Chapter 62-4.050(4)(q)4, a check for the application fee of \$2000.00 is attached to this request. Other Attachments include;

1. Letter from DOD contractor discussing the need for using this non-compliant metal wash primer.
2. Copy of MSDS for the wash primer
3. The potential emission calculations submitted as part of the application to EPD.

For information regarding this facility please contact me at 407-851-1144 or email at [ramlin@ramlin.com](mailto:ramlin@ramlin.com). Should you have any technical questions regarding the air pollution aspects of this variance request, please contact Bruno Ferraro at 407-298-2282 or email [Bruno@grovescientific.com](mailto:Bruno@grovescientific.com). Ram-Lin and its employees look forward to a successful resolution to our request for a variance so we can continue to fulfill our contractual obligations to the DOD and seek future contracts.

Sincerely,



David McCorkle,

President

Cc: Dave Knothe, CIH, Atlas Scientific

Bruno Ferraro, CEP, QEP, Grove Scientific & Engineering Company





A Finmeccanica Company

14 February 2013

David McCorkle, President  
Ram-Lin  
2136 E. 4th Street  
Orlando, FL 32824

Mr. McCorkle,

This letter is in response to your inquiry for a letter regarding the requirement for the US Air Force to use a DOD-P-15328D Metal Wash Primer.

Ram-Lin DBA Central Florida Custom Trailers, Inc. is processing parts as subcontractor to DRS Sustainment Services in support of this contract.

In the specifications of US Air Force Contract ID FA8519-12-D-0002 (60K Tunner Cargo Loader Contractor Logistics Support) for this US Air Force Tunner 60K Loader Refurbishment Program, it is a documented DOD requirement in the contract for Ram-Lin to continue to apply Sherwin Williams E90G4/V93VC2 Metal Wash Primer Pre-treatment to all aluminum parts.

If there are any questions regarding this requirement, please do not hesitate to contact our office.

A handwritten signature in black ink that reads "Edward Skibinski".

Edward Skibinski  
Tunner Program Manager  
DRS Technologies, Inc  
(314) 553-4530

**ATTACHMENT 2**

**MSDS FOR DOD-P-15328D**



**SHERWIN  
WILLIAMS.**

## Product Finishes

CC-M12

# DOD-P-15328D Metal Wash Primer

Green (Component A)..... E90G4  
Catalyst (Component B)..... V93VC2

<u>DESCRIPTION</u>	<u>CHARACTERISTICS</u>	<u>SPECIFICATIONS</u>
<p><b>E90G4/V93VC2</b> is a pretreatment, two package, acid catalyzed vinyl wash primer used for clean metal surfaces. It is used to enhance adhesion of the coating system and conforms to Military Specification DOD-P-15328D.</p> <p><b>Advantages:</b></p> <ul style="list-style-type: none"> <li>• Increase adhesion of topcoat</li> <li>• Fast dry</li> <li>• Conforms to Navy Formula 117 and DOD-P-15328D</li> </ul> <p>An Environmental Data Sheet is available from your local Sherwin-Williams facility.</p>	<p><b>Volume Solids:</b>            E90G4: 10.1 ± 2%            V93VC2: 7.2 ± 2%            Admixed: 7.9 ± 2%</p> <p><b>Viscosity:</b>            E90G4: 63-75 Krebs Units            Admixed: 15-30 seconds #2 Zahn Cup</p> <p><b>Recommended film thickness:</b>            Mils Wet 3.8 - 6.3            Mils Dry 0.3 - 0.5</p> <p><b>Spreading Rate</b> (no application loss)            189-529 sq ft/gal @ 0.3-0.5 mils DFT</p> <p><b>Drying</b> (1.0 mils DFT, 77°F, 50% RH):            To Recoat: 4 hours maximum for optimum adhesion - 30-60 minutes recommended for best results.            Force Dry: 5-10 min. at 130°F</p> <p><b>Flash Point:</b> 72°F Pinsky-Martens Closed Cup</p> <p><b>Mixing Ratio:</b> by volume            4 part E90G4            1 part Isopropyl Alcohol, R6K20            1 part max. V93VC2</p> <p><b>To avoid premature gelling and improve spray characteristics, mix E90G4 and Isopropyl Alcohol, then add V93VC2.</b></p> <p><b>Note: Do not use more than one part by volume isopropyl alcohol</b></p> <p><b>Pot Life:</b> 8 hours at room temperature. Higher temperature will shorten pot life.</p> <p><b>Package Life:</b> inside storage            E90G4, 1 year            V93VC2, 2 years</p> <p><b>Air Quality Data:</b>            Non-photochemically reactive            Volatile Organic Compounds (VOC)            E90G4 as packaged, maximum 5.89 lb/gal, 706 g/L            V93VC2 as packaged, maximum 5.95 lb/gal, 721 g/L            catalyzed and reduced as above, 6.1 lb/gal, 732 g/L</p>	<p><b>Steel:</b> Surface must be clean and free of grease, dirt, oil, rust, fingerprints, and other contaminants to insure optimum adhesion and performance properties. Where blasting is appropriate, blast in accordance with SSPC-SP6. Prime with wash primer E90G4 within two hours after blasting.</p> <p><b>Aluminum:</b> Clean with acidic cleaner or other appropriate cleaner depending on contamination.</p> <p><b>Galvanized and other metals:</b> Clean and remove oxidation contamination on surface, followed by treatment with E90G4. Due to the variability in these surface, testing adhesion on each situation is recommended.</p> <p><b>Testing:</b> Due to the wide variety of substrates, surface preparation methods, application methods, and environments, the customer should test the complete system for adhesion and compatibility prior to full scale application.</p>

## APPLICATION

### Typical Setups

**Reduction:** Reduce up to 15% with Isopropyl Alcohol. Use PM Acetate when better flow or slower evaporation is required.

**May be applied by:**

Conventional Spray  
Airless Spray  
Air Assisted Airless  
HVL P

Please consult with your Sherwin-Williams sales representative for proper settings for your spray equipment.

**Cleanup:**

Clean tools/equipment immediately after use with Isopropyl Alcohol, MEK, MIBK, MAK, n-Butyl Acetate, or any other epoxy thinners, such as MIL-T-81772, Type II Thinner, R91K210. Follow manufacturer's safety recommendations when using any solvent.

## SPECIFICATIONS

**Product Limitations:**

- Product must be applied over properly prepared substrates.

**Performance Properties:**

Meets all the performance properties of DOD-P-15328D.

## CAUTIONS

### FOR INDUSTRIAL SHOP APPLICATION

Thoroughly review product label and Material Safety Data Sheet (MSDS) for safety and cautions prior to using this product.

A Material Safety Data Sheet is available from your local Sherwin-Williams facility.

Please direct any questions or comments to your local Sherwin-Williams facility.

**Note:** Product Data Sheets are periodically updated to reflect new information relating to the product. It is important that the customer obtain the most recent Product Data Sheet for the product being used. The information, rating, and opinions stated here pertain to the material currently offered and represent the results of tests believed to be reliable. However, due to variations in customer handling and methods of application which are not known or under our control, The Sherwin-Williams Company cannot make any warranties as to the end result.

# **ATTACHMENT 3**

## **POTENTIAL EMISSION CALCULATIONS**

# **Source Description**

## **Ram-Lin**

### **Background**

Ram-Lin is a metal fabrication and finishing operation located at 2136 East Fourth Street, Orlando, FL 32824. This company fabricates and finishes metal parts and finished products such as boat trailers, custom boat arches, military trailer/decks and other items. Orange County Environmental Protection Division (EPD) visited this facility in June 2012 and issued a letter indicating an air permit was required to operate this business.

Atlas Scientific was contracted to assist Ram-Lin in developing in-house records on paint and solvent usage and responded to EPD in two letters dated September 25, 2012 and December 4, 2012. EPD responded in a letter dated December 12, 2013 requesting Ram-Lin to submit an after-the-fact air construction permit application.

### **Description**

Ram-Lin currently operates two (2) emission units; a metal preparation and a metal finishing process. These emission units consist of the following;

1. one (1) sandblasting booth
2. two (2) drive-in paint spray booths

Associated with this process are exempt processes that include;

- metal fabrication that includes cutting, grinding, drilling and welding and associated equipment such as air compressors and milling tools

- surface preparation of metal parts that includes sanding, filling and solvent wipe-down

### **Rule Applicability**

Particulate emissions from the sand blast operation is regulated under the “General Pollutant Emission Limiting Standards” referenced in Chapter 62-296.320(4)(b)1 F.A.C. This blasting booth is controlled by a Hoffman cartridge style dust collector which vents outdoors.

The drive-in spray booth is regulated under the following standards;

- 62-296.320(1) and (2) for volatile organic compounds (VOC) and objectionable odors.
- 62-296.320(4)(b)1 for visible emissions
- 62-296.513 Reasonable Available Control Technology (RACT) for Surface Coating of Miscellaneous Metal Products

These drive-in spray booths vent to the atmosphere through the roof.

Particulate matter is controlled by paint arrestor filters. Currently there are 5 guns total at this facility but only three are used at any one time. There are 2 guns in the large booth and one in the small booth. This is subject to change based on future production demands.

Ram-Lin has been working with Atlas Scientific and their paint suppliers and has concluded that there are RACT compliant paints that meet all of their client specification. The following are the RACT emission standards that we have identified as applying to their painting operation;

- 4.3 lbs VOC/gal of coating for clear coatings
- 3.5 lbs VOC/gal of coating for extreme performance coatings

- 3.5 lbs VOC/gal of coating that is air dried
- 3.0 lbs VOC/gal of coating for all other coatings

All of the paints used for boat trailers and military platforms are considered extreme conditions coatings. Some of the custom boat arches are clear-coated. We are not aware of any other metal products not considered extreme performance at this time, but Ram-Lin is always looking for alternative business opportunities that may not require these types of hi-performance coatings.

Ram-Lin proposes to use RACT compliant paints and mixed in the ratios recommended by the suppliers so that the VOC content as delivered to the coating applicator meets these emission limits.

There is one product that will require Ram-Lin to submit a petition for RACT variance. This product is a chromate wash coating preparation used prior to priming and painting military components and is specifically called out in the contract because alternate product that works for this application is not currently available. The petition for a variance will be submitted under a separate cover letter.

This facility is subject to 40 CFR Part 60 Subpart HHHHHH, *Paint Stripping and Miscellaneous Surface Coating Operations*. Ram-Lin does not use methylene chloride-containing stripper but the wash primer does contain chromium compounds. This facility is considered an area source of HAPs. The 6H painter training has been completed by Sherwin Williams and copies of the certificates are included in. Ram-Lin is researching to see if the initial notification and notification of compliance has been submitted. The spray guns have all been replaced to meet the HVLP requirements.



## **Potential Emission Calculations**

### **EU001 - Sand Blasting Booth**

The blast booth is a drive-in style equipped with a modified Donaldson Torit cartridge-style, pulse jet dust collector with 24 ultra-web filters providing 4,560 ft<sup>2</sup> of filter area. The system is equipped with a 12,000 cfm fan utilizing a 30 HP electric motor resulting in an approximate air-to-cloth ratio of 2.63:1. The dust collector was modified to include a drop-out system to collect the chromium containing sand/dust.

Ram-Lin uses garnet sand as the abrasive. Currently, they sand-blast 3 steel decks per month and generate 2 drums of dust waste per deck. Each drum weighs an average of 850 pounds. This dust is both from the drop-out box and the dust collector resulting in a gross overestimation of potential emission, since the dust from the drop-out box does not make it to the dust collector. Based on the current production rate a potential emission rate is calculated below.

### **Potential PM Emission**

$(3 \text{ decks/month})(1700 \text{ pounds waste dust/deck})/(1 \text{ ton}/2000 \text{ lbs}) = 2.55 \text{ tons/month}$

$(2.55 \text{ tons/month})(12 \text{ months/yr}) = 30.6 \text{ TPY}$

### **Controlled PM Emissions**

The filters are rated at 13 MERV which is 75% efficient at particles between 0.3 and 1.0 um. These filters are >99% efficient for particles at 10 um, typically the size collected during sandblasting. Therefore, we estimate actual emissions as follows;

$$(30.6 \text{ TPY})(1-0.99) = 0.306 \text{ TPY}$$

The applicable standard will be no visible emissions ( $\leq 5\%$  opacity) except that visible emissions up to 20% opacity are allowed for 3 minutes in any one-hour period.

### **EU002 - Surface Coating Operation**

Potential emission calculations from the surface coating operation are based on the maximum facility-wide projected coating and solvent consumption. Ram-Lin evaluated three months of purchase records and reviewed typical annual consumption to estimate the maximum usage rate for coatings and solvents for the next 5 years. The annual consumption is limited by the two paint booths at this facility. In order to exceed these estimated paint consumption quantities Ram-Lin would need to add additional paint booths to this facility. To simplify the potential emission calculations we are assuming all coatings contain 3.5 pounds per gallon of VOC. This is a conservative approach as the technical data sheets were reviewed and all of the coatings meet the 3.5 pounds per gallon RACT limit and many are below this limit.

The maximum annual coating usage rate is estimated to be 25,000 gallons per year:

$$(25,000 \text{ gal/yr})(3.5 \text{ lbs VOC/gal})/(2000 \text{ lbs/ton}) = 43.75 \text{ TPY VOC}$$

The emissions from the wash primer that requires the request for variance are not included in the coatings since it contains a higher VOC content:

The maximum annual wash primer usage rate is estimated to be 100 gallons per year:

$$(100 \text{ gal/yr})(5.78 \text{ lbs VOC/gal})/(2000 \text{ lbs/ton}) = 0.29 \text{ TPY VOC}$$

The request for a variance from the RACT standard will be submitted soon.

In addition to the coatings Ram-Lin uses various solvents for both preparation and clean-up. The main clean-up solvent is acetone but there are a few other products used as well such as paint thinner, methyl amyl ketone, wax and grease remover and plastic surface cleaner. To be conservative we used an average density of all clean-up solvents and assume 100% VOC (excluding acetone). Annual acetone usage is estimated to be approximately 2,000 gallons.

The maximum annual clean-up solvent usage (excluding acetone) is estimated to be 1,200 gallons per year. These contain 4.6% of HAP resulting in 0.19 TPY.

$$(1,200 \text{ gal/yr})(6.94 \text{ lb/gal density})(100\% \text{ VOC})/(2000 \text{ lbs/ton}) = 4.16 \text{ TPY VOC}$$

### **Particulate Emissions from Spray Painting**

The facility uses rolled mat style filters such as Research Products paint arrestor filters. Ram-Lin paints large flat objects such as the military decks, tubular parts and trailers. The US EPA AP-40 Table 232 shows that flat panels have an estimated overspray of 50%, while the other shapes are estimated at 85% overspray. In a large drive-in booth, some of the paint solids drop out before they make it to the filters. As a conservative estimate, we use an average overspray of 68% and an average paint density of 10 lbs/gallon to estimate particulate emissions from the paint booths. The filter efficiency for the 3000 series filter is 96.5 to 97.5%. Therefore;

$(10 \text{ lbs/gal}) - (3.5 \text{ lbs VOC/gal}) = 6.5 \text{ lbs of solids/gallon}$

$(6.5 \text{ lbs solids/gal})(25,100 \text{ gal/yr}) = 163,150 \text{ lbs of paint solids/yr}$

$(163,150 \text{ lbs solids/yr})(0.68)(1-0.965)(1 \text{ ton}/2000\text{lbs}) = 1.94 \text{ ton/yr}$

### **Summary of Facility-Wide Potential Emissions**

Emission Unit	VOC (tons/yr)	HAP (tons/yr)	PM (tons/yr)
EU 001 - Sand Blasting			
	-	-	30.6
EU 002 - Surface Coating			
Coatings	43.75	1.99	1.94
Wash Primer	0.29	0.003	-
Clean-Up	4.16	0.19	-
<b>FACILITY-WIDE TOTALS</b>	<b>48.20</b>	<b>2.18</b>	<b>32.54</b>

**Ram-Lin**  
2136 East Fourth Street  
Orlando, FL 32824  
P: 407-851-1144 F:407-857-2990  
www.ramlin.com

JPMORGAN CHASE BANK, NA  
63-8413/2670

33860

2/14/2013

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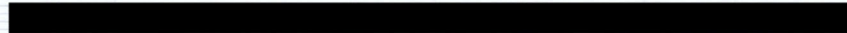
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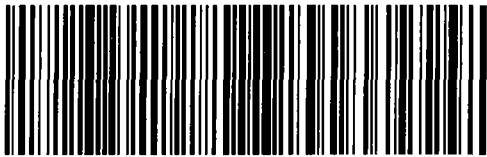
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