

STATEMENT OF BASIS

Title V Air Operation Permit Revision
Permit No. 0570442-021-AV

APPLICANT

The applicant for this project is Gulf Marine Repair/Hendry Marine Industries. The applicant's responsible official and mailing address are: David Payton, HSE Director, Gulf Marine Repair/Hendry Marine Industries, 1800 Grant Street, Tampa, Florida 33605.

FACILITY DESCRIPTION

The applicant operates two ship building and repair operations and a bulk material handling operation, which are located in Hillsborough County at 1800 Grant Street, Tampa, Florida. The following is a summary of each operation.

Gulf Marine Repair Ship Building and Repair Operations

The activities at GMR include the blasting and coating of marine vessels, which includes external and internal blasting and painting. The blasting equipment includes five blasting pots. Compressed air for propelling the abrasive blasting material is provided by up to eight diesel fuel fired compressors. Particulate matter emissions from the abrasive blasting operation are controlled by application practices and total enclosures using portable screens/tarps, which are required at all times when blasting a ship.

A partially-enclosed blasting/coating booth is used to help prepare miscellaneous metal parts prior to being installed on a ship. Particulate matter emissions from the blasting operation are controlled by the building enclosure and are vented to a 40,000 acfm baghouse on the west side of the booth. Also, a portable small parts blasting/coating area is present at the site and is comprised of tarps hung on raised wires to contain particulate matter emissions from the blasting and painting of miscellaneous parts.

After blasting, the surfaces are sprayed with a series of marine coatings, which may contain one or more volatile organic compounds (VOCs) and/or hazardous air pollutants (HAPs). Coating activities covered include the painting of the main deck, the superstructure, the hull exterior, and the ship interior. A permanent coating building is also onsite for the painting of miscellaneous metal parts.

Hendry Marine Industries' Ship Building and Repair

Hendry's operations consist of various abrasive blasting and coating operations associated with ship maintenance and repair. The facility operates the activities through the use of submergible dry docks. The abrasive blasting operation consists of up to two storage silos equipped with a fabric sock filter; up to two 24-ton capacity blasting pots; a maximum of four abrasive blasting lines per pot; and one diesel compressor fired on No. 2 fuel oil.

Particulate matter emissions from the abrasive blasting operation are controlled by application practices and total enclosures using portable screens/tarps, which are required at all times when blasting a ship. When blasting an internal section of a ship, the displaced air is passed through a filter device or a tarp enclosure that covers the exhaust points from the internal blasting prior to exhausting to the atmosphere. A portable blasting/coating containment area is also present for the blasting and painting of miscellaneous parts.

After blasting, the surfaces are sprayed with a series of marine coatings, which may contain one or more volatile organic compounds (VOCs) and/or hazardous air pollutants (HAPs). Paint overspray is controlled by application practices and total enclosures using portable screens/tarps, which are required at all times when painting a ship.

Combined Gulf Marine Repair/Hendry Marine Industries

GMR or Hendry is also authorized to operate at the Hendry's property, Hooker's Point site. The property is located directly south of the main yard and supports up to 3 additional dry docks. Operation at this site includes up to an additional 8 diesel compressors, 4 abrasive material silos, and 5 blasting pots.

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Tampa Marine Terminals

Tampa Marine Terminals receives bulk materials by either truck or ship. Bulk materials that are received by ship are transferred into two (2) on-shore hoppers, which transfer the material into open bed trucks. The trucks drive from the on-shore hoppers to the storage pile area of the property and dump the bulk material into storage piles. When ready to be shipped offsite, a front-end loader reclaims the material from the storage piles and loads it into open bed trucks for off-site delivery.

This facility also includes miscellaneous insignificant emissions units and/or activities.

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	Exterior Coating
002	Interior Coating
003	Abrasive Blasting including Diesel Compressors
004	Abrasive Silos and Blasting Pots
008	Blasting/Coating Booth
009	Bulk Material Handling - Ship Unloading to Onshore Hopper
010	Bulk Material Handling - Onshore Hopper to Truck
011	Bulk Material Handling - Truck to Pile Transfer Point
012	Bulk Material Handling - Pile to Pile Movement or Movement of Material within Storage Pile
013	Bulk Material Handling - Front-end Loader to Truck Transfer Point

APPLICABLE REGULATIONS

Based on the Title V air operation permit revision application received on November 5, 2018, this facility is a major source of PM, VOC, and hazardous air pollutants (HAPs). A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
<i>Federal Rule Citations</i>	
40 CFR 63, Subpart A, NESHAP General Provisions	001, 002, 008
40 CFR 63, Subpart II	001, 002, 008
<i>State Rule Citations</i>	
Rule 62-296.320, F.A.C.	001 – 004, 008 - 013
Rule 62-296.513, F.A.C.	001, 002, 008
Rule 62-296.700, F.A.C.	009 – 013
Rule 62-296.711, F.A.C.	009 - 013
Rule 62-296.712, F.A.C.	003, 004, 008
<i>Local Rule Citations</i>	
Ch. 1-3, Rules of the EPCHC	003, 004, 008 - 013

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PROJECT DESCRIPTION

The purpose of this permitting project is to revise the Title V Permit No. 0570442-018-AV to incorporate Permit No. 0570442-020-AC, which combined the Tampa Marine Terminals, LLC's bulk material handling operation with the Gulf Marine Repair/Hendry Marine Industries operations. Based on the information provided, the facilities are being combined for the convenience of overseeing both operations by one environmental department because the facilities are located next to each other and are owned by the same corporation.

Also, Permit No. 0570442-020-AC is being issued concurrently with this TV Revision permit.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit, Permit No. 0570442-004-AV, issued on June 14, 1996

Title V Air Operation Permit Renewal, Permit No. 0570442-017-AV, issued on May 15, 2015

Title V Air Operation Permit Revision, Permit No. 0570442-018-AV, issued on December 28, 2017

Application for a Title V Air Operation Permit Revision received November 5, 2018

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 3731 – Ship Building and Repair. The facility is categorized under this classification code because ship building and repair is the primary activity that occurs at the facility.

North American Industry Classification System (NAICS): 336611 - Ship Building and Repair.

HAP: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63, specifically, 40 CFR 63, Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating). The facility is not subject to 40 CFR 63, Subpart M, for the surface coating of miscellaneous metal parts and products since the facility is already subject to the Subpart II pursuant to 40 CFR 63.3881(c)(12).

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

GHG: The facility is not identified as a major source of green house gas (GHG) pollutants.

PROJECT REVIEW

Changes to the permit made as part of this revision are shown in ~~strike through~~ format for deletions and in double underline format for additions. For ease of identification, all changes have also been **highlighted in yellow** within the permit document.

1. In Section I, Subsection A - Facility Description, the bulk material handling emission units and the operation description are added.
2. In Section I, Subsection C – Applicable Regulations, the table was updated to include the state rules that are applicable to the bulk material handling operation.
3. Specific Condition No. FW5. is updated as follows to include the potential emissions from the bulk material handling operation.

FW5. Potential Emissions: In order to limit the potential to emit (PTE), the following limitations and restrictions apply to Gulf Marine Repair/Hendry Marine Industries and to the bulk material handling operation, as a combined facility: [Rule 62-4.070(3), F.A.C. and Permit No. 0570442-020-AC]

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- A) The maximum volatile organic compound (VOC) emissions (coating operations and compressors for blasting) shall not exceed 242.4 tons per twelve consecutive month period;
- B) The maximum combined particulate matter (PM) emissions from the abrasive blasting operation (including diesel compressor emissions) and from the bulk material handling operation shall not exceed ~~83.4~~ 112 tons per twelve consecutive month period;
- C) Total HAP emissions (coating operations and compressors for blasting) shall not exceed 189.7 tons per any 12 consecutive month period

4. Specific Condition No. FW13. is updated as follows to maintain consistency with the most recent permitting templates.

~~FW13. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]~~

- ~~A) Alteration or replacement of any equipment* or major component of such equipment.~~
- ~~B) Installation or addition of any equipment* which is a source of air pollution.~~

FW13. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the EPCHC. Also, the permittee shall not handle any materials other than those allowed by this permit without obtaining an air construction permit from the EPCHC. Such permit shall be obtained prior to beginning construction, modification, or handling a material other than those allowed by this permit. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C. and Permit No. 0570442-020-AC]

5. Section III, Subsection C. - Emission Units and Specific Conditions, is added to the permit.

CONCLUSION

This project revises the Title V air operation permit No. 0570442-018-AV, which was effective on December 28, 2017. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.