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| 1030155 75637 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **FACILITY:** **Coastal Steel Construction, Inc.** | | | | | | | | | | | | | | | | | | | | **PERMIT ID: 34** | | | | | | | | | | | | | | |
| **31st Street Facility** | | | | | | | | | | | | | | | | | | | | **DISTRICT:** Southwest | | | | | | | | | | | | | | |
| **ADDRESS:** 1000 31st Street South | | | | | | | | | | | | | | | | | | | | **CONTACT PHONE:** | | | | | | | | | | | | | | |
| St. Petersburg, FL | | | | | | | | | | | | | | | | | | | | 727-327-7123 | | | | | | | | | | | | | | |
| **ARMS NO:**  **1030155 001** | | | | | | | | **PERMIT NO:** | | | | | | | | | | | | **Expiration Date:** 2/23/15  **Renewal Date:** 12/25/14 | | | | | | | | | | | | | | |
|  | | | | | | | | **1030155-003-AO** | | | | | | | | | | | |  | | | | | | | | | | | | | | |
|  | | | | | | | |  | | | | | | | | | | | | **Test Due Date:** | | | | | | | | | | | | | | |
| **EMISSION UNIT DESCRIPTION:** **Spray Paint Area for Coating Structural Steel Fabrications. (RACT) The facility uses an airless spray system.** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **CMS INSPECTION DATE:** | | | | | | | **ARMS INSPECTION TYPE:** | | | | | | | | | | | | | | | **COMPLIANCE STATUS:** | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|  | **June 23, 2011** | | | | |  |  | | | INS**1** | | **✓** | **INS2** |  | | INS**3** | |  | FUI | | | | **✓** | | **IN** |  | | MNC | | |  | | SNC | |
|  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| **INSPECTION TYPE:** | | | | **✓** | **Initial** | | | |  | | Re-inspection | | | |  | | Complaint | | | |  | | | Drive-by | | | |  | | Quarterly | | | | |
|  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **✓** | | | **A. General Review:** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **1.** | | Permit File Review | | | | | | | | | | | | | | | | | | | | | | | | |  | | Yes | | |  | | No |
|  | | ***C****omments:* | | | | | | | | | | | | | | | | | | | | | | | | |  | |  | | |  | |  |
| **2.** | | Introduction and Entry | | | | | | | | | | | | | | | | | | | | | | | | |  | | Yes | | |  | | No |
|  | | ***Comments****: I was greeted by Mr. Steven McMullen. Mr. McMullen introduced me to Anthony Eldridge who is in training as an alternate contact. Mr. McMullen showed me the facility’s copy of the 1030155-003-AO permit. Mr. Eldridge is maintaining the VOC logs in conjunction with Mr. McMullen. Mr. Eldridge gave me the tour of the facility’s paint area.* | | | | | | | | | | | | | | | | | | | | | | | | |  | |  | | |  | |  |
| **3.** | | **Is the Responsible Official/Authorized Representative still: Greg Best?** | | | | | | | | | | | | | | | | | | | | | | | | |  | | Yes | | |  | | No |
|  | | ***C****omments:*  **The Responsible Official/Authorized Representative’s e-mail is:** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **4.** | | **Is the facility contact still:**  *Mr. Steven McMullen* **?** | | | | | | | | | | | | | | | | | | | | | | | | |  | | Yes | | |  | | No |
|  | | ***C****omments: The alternate contact in training is Anthony Eldridge.*  **The facility contact’s e-mail is:** [***lindaac@coastalstpete.com***](mailto:lindaac@coastalstpete.com) ***(receptionist/secretary receives all e-mails)*** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| **IN** | **MNC** | **SNC** | **B. Specific Conditions:** |
| --- | --- | --- | --- |
| **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓**  **✓** |  |  | **General Conditions [**62-4.160, F.A.C.]  12. This permit or a copy thereof shall be kept at the work site of the permitted activity.  ***Comments****: A copy of the permit  was kept at the worksite.*    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:   * 1. A description of and cause of noncompliance; and   2. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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.   ***Comments****: Mr. McMullen stated that Coastal was in compliance with all permit conditions since the last inspection on 9/10/10.*    **Common Conditions** [Rule 62-296.320(4)(c), F.A.C.]  Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.  **Emissions and Controls**  2. 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.]  ***Comments****: There is no control equipment at Coastal Steel. The Control Technology is in the RACT Compliant Coatings that Coastal uses with 3.43 lbs VOC per gal less exempt solvents.*    6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]  ***Comments****: I verified on the shop floor that the paint drums and paint solvent cans were sealed. There were no leaks or spills and the paint area looked better than it ever has because the accumulated overspray on the concrete had been removed. There were no odors inside or outside of the property that could be attributed to the use of paint or solvents. Coastal uses an airless spray system that is left overnight in a closed container with some thinner to keep the nozzle viable. The quantity of thinner used is recorded as used for Cleaning.*    7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An “objectionable odor” means 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. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]  A.5. General Standards - Objectionable Odor: No person shall 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.  [Rules 62-210.200(“Objectionable Odor”) and 62-296.320(2), F.A.C.; Pinellas County Code, §58- 178]  ***Comments:*** *An upwind/downwind survey of the facility was conducted. The observed parameters were:*  *Downwind odor level detected- none; Wind direction - ENE Upwind odor level detected-none.*    9. Unconfined Particulate Emissions:   1. 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. 2. Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter. 3. Reasonable precautions include the following: 4. Paving and maintenance of roads, parking areas and yards. 5. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing. 6. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities. 7. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne. 8. Landscaping or planting of vegetation. 9. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter. 10. Confining abrasive blasting where possible. 11. Enclosure or covering of conveyor systems.   ***Comments****: The facility’s property is, conservatively speaking, greater than 98% concrete or asphalt and the other 2 % is landscaped with bushes and grass. There were no fugitive dust emissions originating from the property and no conditions that I could, to the best of my judgment, perceive as having a potential to create fugitive dust emissions. There was no painting activity going on at the time of my inspection.*    **Administrative Requirements**  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. [Rule 62-210.370(3), F.A.C.]  ***Comments:*** *The annual operating report for calendar year 2010 was submitted on 3/3/11.*    8 Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to PCDEM (Compliance Authority) no later than 60 days prior to the expiration date of the operation permit.  [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.]  ***Comments:*** *The permit expires on 2/23/15. An application is required to be submitted no later than 12/25/14.*    A.2. Material Use Limit: The maximum total raw material usage of coatings and solvents shall not exceed 4,908 gallons per any consecutive 12-month period.  [Construction Permit AC52-267942]  ***Comments****: Coastal used 987.332 gallons of coating in the last 12 consecutive months ending in April (12 mos. running cumulative total gallons), therefore in-compliance with raw material usage. I saw records available, which covered all the way to the last week of June 2011.*    A.3. Material VOC Content: This facility is limited to the use of coatings that do not exceed 3.5 pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator (“as applied”). Unless directed into containers that prevent evaporation into the atmosphere, the use of solvent washings shall be included in the “as applied” VOC coating content.  [Rules 62-296.513(2)(a)2. and (2)(c), F.A.C.]  ***Comments****: The Gray Paint being used has 3.43 lbs VOC/gal less water and exempt compounds.*    A.4. VOC Emission Limitations: The facility is subject to the following limitations:  Total facility Volatile Organic Compound (VOC) emissions shall not exceed 9.9 tons per any consecutive 12-month period.   * + - 1. Emissions attributed to use of coatings shall not exceed 8.5 tons per any consecutive 12-month period.       2. Emissions attributable to use of solvents shall not exceed 1.4 tons per any consecutive 12-month period.   {Permitting Note: The VOC emission limitations above indirectly limit the potential HAP emissions below the Title V permitting thresholds of Chapter 62-213, F.A.C., since all of the HAPs are expected to be VOCs.}  [Rule 62-210.200(PTE), F.A.C.; Construction Permit AC52-267942]  ***Comments****:*   1. *Emissions attributed to use of coatings were 1.693 tons in the running, cumulative consecutive 12-month period ending in April of 2011.* 2. *Emissions attributed to use of solvents were 0.015 tons in the running, cumulative consecutive 12-month period ending in April of 2011.*     A.6. General Standards - Visible Emissions: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions 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 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  [Rules 62-296.320(4)(b)1& 4, F.A.C.]  A.8. General Standards - Unconfined Particulates: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320, 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. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include, but not be limited to the following:   1. Watering the facility’s grounds as needed. 2. Ceasing of paint operations if overspray is observed leaving the facility property line. In order to provide reasonable assurance that the above measures are being implemented and that they are effective in controlling unconfined emissions of particulate matter, visible emissions from any facility area should not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but an indication that additional controls may be required.   [Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]  ***Comments****: I did not perform a Method 9 VE, but there were no fugitive dust emissions and there was no painting going-on at the time.*    A.7. General Standards - (VOC) Emissions and/or (OS) Emissions: The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The facility shall comply with the following:   1. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials. 2. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere or become subject to Specific Condition No. A.3. 3. Tightly cover or close all VOC and/or solvent containers when they are not in use. 4. Prevent excessive air turbulence across exposed VOCs. 5. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.   [Rule 62-296.320(1)(a), F.A.C.; Pinellas County Code, §58-178]  ***Comments****: There were no leaks, spills or fugitive emissions. The paint and solvent containers were sealed.*    A.9. VOC Recordkeeping: In order to document compliance with the limitations of Specific Condition Nos. A.2., A.3., and A.4., the permittee shall maintain a log at the facility which documents the following:  Daily:   1. Facility name, Facility ID No. (1030155), Emission Unit No. & Description (001-Surface Coating Operations), and applicable rule [62-296.513(2)] 2. The application method and substrate type (metal, plastic, paper, etc.) 3. The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent used in gallons at each point of application, including exempt compounds 4. The VOC content as applied in each coating and solvent 5. The date for each application of coating and solvent 6. The amount of each Surface Preparation, Clean-Up, Wash-Up of solvent (including exempt compounds) used in gallons and the VOC content of each   Monthly:   1. Facility name, Facility ID No. (1030155), Emission Unit No. & Description (001-Surface Coating Operations) 2. The total raw material usage of coatings and solvents (gallons) 3. The VOC emissions from the use of coatings (tons) 4. The VOC emissions from the use of solvents (tons) 5. The most recent consecutive 12-month total of raw material (coatings and solvents) used (gallons) 6. The most recent consecutive 12-month total of the total facility VOC emissions (tons) 7. The most recent consecutive 12-month total of VOC emissions from the use of coatings (tons) 8. The most recent consecutive 12-month total of VOC emissions from the use of solvents (tons)   Supporting documentation (MSD sheets, purchase orders, U. S. EPA "VOC DATA SHEETS”, etc.) shall be kept for each paint, coating, thinner, solvent and other material used in the painting and coating operations which includes sufficient information to determine VOC emissions.  These records shall be retained on file at the facility for at least three (3) years and shall be made available to the Department and the Pinellas County Department of Environmental Management (PCDEM) upon request.  [Rules 62-4.070(3), 62-4.160(14)(b), 62-296.500(2)(b), and 62-296.513(2), F.A.C.; Pinellas County Code §58-90]  ***Comments****: Coastal was maintaining material usage and VOC emission records that were in compliance with a. through n. above. (see copies of the months of August & November, 2010 and January & April 2011 3 as examples)* |
| **✓** |  |  | Valid Permit [Rule 62-210.300] |
| **✓** |  |  | Changes to Facility/emission unit [Rule 62-210.300] *Does the emission unit description above match what the facility is operating (Number of emission units or points.  Yes  No*  **C**omments: |

| **✓** | | **C. Other:** | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Pollution Prevention Activities**   * P2 Handouts Provided:  P2 Brochure;  P2 Manual;  P2 Checklist * Have any emissions reductions occurred  *Yes /*  *No*   Chemical Substitution;  Equipment Changes;  Process Changes  Chemical/Material Reuse; On-site Recycling;  Other:  ***Comments:*** *Mr. Greg Best stopped by to say that business had picked –up a little bit lately, but, was, generally speaking, holding steady as seen over the long term.* | | | | | | | |
| Closing Conference: I informed Messrs. McMullen and Eldridge that Coastal Steel was deemed to be in compliance with applicable rules and permit conditions. | | | | | | | |
| **Inspector(s)**: Jose Rodriguez, *Pinellas County, Air Quality Division* | | | | | | | |
| **Signature(s)**: Date: | | | | | | | **Date: July 6, 2011** |
| ACCESS? | | **✓** | EASIIR? | **✓** |

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| --- | --- | --- | --- |
| AIRS ID  1030155 | OWNER  Coastal Steel Construction, Inc. | | FACILITY NAME  31st Street Facility |
| TITLE V | | SYNTHETIC MINOR | DATE OF THIS FCE  7/6/2011 |
| TITLE V MEGA-SITE\* | | OTHER | DATE OF LAST FCE |

\*Facility with a large number of complex emissions units. It is more reasonable to evaluate a Title V Mega-Site once every 3 years instead of once every 2 years.

Review of All Required Reports

|  |  |  |
| --- | --- | --- |
| PERIODIC REPORTS | | COMMENTS |
| DONE  N/A | Annual operating report | Calendar 2010 AOR Received timely & complete. |
| DONE  N/A | Statement of compliance |  |
| DONE  N/A | Annual |  |
| DONE  N/A | Semi-annual |  |
| DONE  N/A | Quarterly |  |
| DONE  N/A | Other : |  |
| DONE  N/A | Other : |  |

|  |  |  |
| --- | --- | --- |
| CONTINUOUS EMISSION MONITOR REPORTS | | COMMENTS |
| DONE  N/A | Quarterly excess emissions |  |
| DONE  N/A | Semi-annual |  |
| DONE  N/A | RATA |  |
| DONE  N/A | CGA |  |
| DONE  N/A | Other : |  |
| DONE  N/A | Other : |  |

Assessment of Control Device and Process Operating Conditions

|  |  |
| --- | --- |
| OFF-SITE ASSESSMENT | (Describe the off-site assessment in comments) |
| ON-SITE ASSESSMENT | (Document the on-site inspection below) |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| DATE OF INSPECTION | DATE OF INSPECTION REPORT | My office maintains the inspection report... | | |
| ...in the ARMS database through EASIIR. | ...with the paper or electronic compliance files | ...in another location (specify). |
| Jun 23rd, 2011 | July 7th , 2011 |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| COMMENTS | | | | |

Review of Tests and Records

|  |  |  |
| --- | --- | --- |
| TESTS, OBSERVATIONS AND RECORDS | | COMMENTS |
| DONE  N/A | Visible emission observation(s) |  |
| DONE  N/A | Review of facility records and logs |  |
| DONE  N/A | Assessment of process parameters (feed rates, process rates, raw material compositions, etc.) |  |
| DONE  N/A | Assessment of control equipment performance parameters  (water flow rates, pressure drops, temperatures, ESP power levels, etc.) |  |
| DONE  N/A | Stack test(s) |  |
| DONE  N/A | Other : |  |
| DONE  N/A | Other : |  |

Compliance Monitoring (CM) Information

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| CM ELEMENT | My office maintains this information... | | | |
| ...electronically, in the ARMS database. | ...in the permit. | ...in the inspection report. | ...in another location (specify). |
| Facility information |  |  |  |  |
| Applicable requirements |  |  |  |  |
| Inventory of emission units |  |  |  |  |
| Enforcement history |  |  |  |  |
| Compliance activities |  |  |  |  |
| Findings and recommendations |  |  |  |  |
| COMMENTS | | | | |

Other Comments

|  |
| --- |
|  |

Prepared by: Jose Rodriguez Date: July 7th , 2011

Reviewed by: Date:

1. Complete the form as much as possible during for inspection; 2. The remainder of checklist, for activities in the FY, are filled in no later than 9/15; 3. Between 9/15 and 9/30, complete the FCE by closing out the FCS project in ARMS. The INSP > FCS record only accepts a completion date and a comment; it does not accept information on the lower portion of the form.  If an FCS project already exists for the fiscal year in question, enter a completion date and comment in the existing record, do not create a duplicate FCS record.