FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803-3767

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SECRETARY

Electronically Sent- Received Receipt Requested
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DRAFT PERMIT

PERMITTEE

SAPA Precision Tubing, Rockledge, LLC
100 Gus Hipp Boulevard
Rockledge, FL 32955

Authorized Representative:
Mr. Scott Church, Plant Director

Air Permit No. 0090078-008-AC
Permit Effective: XX/XX/2015
Permit Expires: 01/31/2016
Site Name: SAPA Precision Tubing, Rockledge, LLC
Minor Source Air Construction Permit
Project Name: Coating line modifications

This is the draft air construction permit, which authorizes an increase in production in one coating line emission unit located on-site, and establishes lower emission limits in order to classify the facility as a minor source so that it longer requires a Federally Enforceable State Operating Permit (FESOP). The proposed work will be conducted at the SAPA Precision Tubing, Rockledge facility (Standard Industrial Classification No. 3354). The facility is located in Brevard County at 100 Gus Hipp Boulevard in Rockledge, Florida. The UTM coordinates are Zone 17, 528.61 km East, and 3131.0 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

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Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes 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.

Executed in Orange County, Florida

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_____ _____

F. Thomas Lubozynski, P.E. Date
Waste & Air Resource Programs Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) 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 _____ to the persons listed below.

Ms. Roberta Molignaro, HSE Manager, SAPA Precision Tubing (roberta.molignaro@sapagroup.com)
Mr. Don Kramer, Technical Manager, SAPA Precision Tubing (don.kramer@sapagroup.com)
Mr. Thomas Cozzie, T. Cozzie Consulting, Inc. (tcozzie@tcozzie.com)
Mr. Keith Cole, P.E., Environ International Corporation, (kcole@environcorp.com)

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

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_____ _____

(Clerk) (Date)

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FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility consists of two aluminum tubing surface coating lines. The existing facility consists of the following emissions units.

Facility ID No. 0090078	
ID No.	Emission Unit Description
007	Surface Coating Line No. 1 w/ Thermal Oxidizer (control device)
008	Surface Coating Line No. 2 w/ Thermal Oxidizer (control device)

Project Description Affected Emission Units

This project will modify the following emissions unit.

Facility ID No. 0090078	
ID No.	Emission Unit Description
008	Surface Coating Line No. 2 w/ Thermal Oxidizer (control device)

The purpose of this project is to modify emission unit EU-008. The emission unit will be fitted with new equipment to allow for the coating of two strands of metal tube simultaneously, which will increase the permitted maximum capacity of coating mixture applied at this emission unit from 693 lbs/day to 960 lbs/day. Several new coating formulations will be applied on this process line using the same thinning solvent (glycol ether PM acetate) as currently in-use.

In addition, based on the application, this facility should be classified as a natural minor, non-Title V source, rather than as a synthetic minor source. This permit establishes lower emission limits in order to classify the facility as a natural minor source so that it longer requires a Federally Enforceable State Operating Permit (FESOP).

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no 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 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, Prevention of Significant Deterioration, F.A.C.
- This facility is a minor source for volatile organic compounds (VOCs), HAPs, and individual HAPs. The recordkeeping of VOCs and HAP emissions based on total pounds per day of coating applied and production rates on each coating line at the facility will ensure that the actual VOC and HAP emissions remain less than the major source threshold limits.

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PERMIT HISTORY/AFFECTED PERMITS

The facility is currently permitted under Federally Enforceable State Operating Permit (FESOP) 0090078-006-AF. This permit expires on January 31, 2016.

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1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Waste & Air Resource Programs. The Central District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Central District Office
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767
   Telephone: 407-897-4100

   All documents related to applications for permits shall be submitted to the above address or electronically to the following address: **DEP_CD@dep.state.fl.us** . In any electronic submittal clearly identify the Air Permit No. 1270208-002-AC

2. Compliance Authority: The compliance authority for this project is the Florida Department of Environmental Protection, Central District Compliance Assurance Program. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Compliance Assurance Program (Use the above mailing or e-mail address).

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms, and Application Procedures: Unless otherwise specified in this permit, the construction 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: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

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7. Application for Non-Title V Air Operation Permit: This permit authorizes construction or modification of the permitted emissions unit EU-008 and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions units. The permittee shall apply for a Non-Title V air operation permit at least 60 days prior to expiration of this permit. This application may also serve as the renewal application for Permit 0090078-006-AF. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

    a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

    b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

    c. copies of the most recent compliance test reports required by Specific Condition No. **A.11**, if not previously submitted; and,

    d. copies of the most recent two months of records/logs specified in Specific Condition No(s). **A.12**.

[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.]

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A. EU No 008- Surface Coating Line No. 2

This section of the permit addresses the following emission unit.

ID No.	Emission Unit Description
008	Surface coating Line No. 2 with Thermal Oxidizer: This emission unit applies Silicon Flux coating to the aluminum extrusions using roll coaters housed in permanent total enclosure. Emissions from the roll coating applicator room and drying oven are exhausted to the thermal oxidizer before the air is exhausted into the atmosphere through a vertical stack. This Construction Project will allow the facility to expand the coating capabilities of this emission unit by adding a second set of pay-off and take-up spools, and a sizing station to mechanically size the metal tube to desired product dimensions. This additional equipment will allow a second tubing extrusion to be coated simultaneously, thereby increasing the production capacity of the coating line and the potential for application of additional coating mixtures.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum capacity for coating material used at EU-008 shall not exceed the following:

ID No. and Description	Coating Mixture Applied (lbs/day)
008- Surface Coating Line No. 2	960

[Rule 62-210.200(225)(Potential to Emit), F.A.C.; Permit Application received December 31, 2014]

A.2. Restricted Operation: The permittee shall comply with the following:

a. The hours of operation are not limited (8,760 hours per year).
b. The emission unit shall operate only when the thermal oxidizer is operating.

[Rules 62-4.070(3) and 62-210(225)(Potential to Emit), F.A.C.; Construction Permit 0090078-005-AC]

A.3. Authorized Fuel: The permittee is authorized to fire the drying oven and thermal oxidizers using natural gas only.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit 0090078-005-AC]

EMISSIONS STANDARDS

A.4. VOC and HAP Emissions Standards – As proposed by the Applicant, the maximum facility total VOC, total HAPs, and individual HAP emissions from this facility shall not exceed the following limits:

Pollutant	Facility-wide Maximum Emissions Rate (Tons Per Any Consecutive 12-month period)
VOC Emissions	50
Total HAP Emissions	11.3
Individual HAP Emissions	8

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[Permit Application received January 31, 2014, Request for Additional Information Response received January 16, 2015, and Rule 62-210.200(225) "Potential to Emit", F.A.C.]
{*Permitting Note: The facility currently does not use HAP containing coatings. The applicant has requested the total HAP and individual HAP limitations in order to allow for potential future usage of HAP containing coating mixtures to respond to customer requirements. The applicant has accepted the 8 ton per year individual HAP limit so that the facility can be considered a natural minor source.}*

A.5. Visible Emissions. Visible emissions shall not exceed 20% opacity.
[Rule 62-296.320(4)(b)1, F.A.C]

TESTING REQUIREMENTS

A.6. Initial Compliance Tests: The emission unit shall be tested to demonstrate the destruction efficiency of the thermal oxidizer. The initial tests shall be conducted no later than 180 days after initial operation of the surface coating line with the additional second tubing extrusion line installed. The testing shall consist of three (3) runs of one (1) hour duration each. The inlet VOC quantity and outlet VOC quantity shall be measured **simultaneously**. The following values shall be determined as specified:

a. The inlet VOC quantity shall be determined using EPA Method 25A, EPA Method 1, and EPA Method 2.
b. The outlet VOC quantity shall be determined by using EPA Method 25A, EPA Method 1, and EPA Method 2.
c. The destruction efficiency of the oxidizer shall be at least 90 percent.
d. The oxidizer temperature shall be reported.
e. Visible emissions opacity shall be determined by DEP Method 9.

{*Permitting Note: As long as this initial test is conducted and the test report is received by the Department before the due date of the application for renewal of FESOP permit 0090078-006-AF (that is, 12/02/2015), the Department will accept this initial testing as also meeting the requirement for testing in Specific Condition **A.8**. of FESOP Permit.}*
[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C., Construction Permit 0090078-005-AC, and FESOP Permit 0090078-006-AF]

A.7. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.8. Test Method(s): Required tests shall be performed in accordance with the following reference method.

Method(s)	Description of Method and Comments
EPA 1	Sample and Velocity Traverses for Stationary Sources
EPA 2	Determination of Stack Gas Velocity and Volumetric Flow Rate
EPA 25 A	Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer

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A. EU No 008- Surface Coating Line No. 2

Method(s)	Description of Method and Comments
DEP 9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.401, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

A.9. Test Notification: The permittee shall notify the Compliance Authority (**DEP_CD@dep.state.fl.us)** at least 15 days prior to the date on which each formal compliance test is to begin. The notification shall include 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 for the permittee.
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.10. Notification of Operation Commencement: The permittee shall notify the Compliance Authority (**DEP_CD@dep.state.fl.us)** of the date of commencing operation of the coating line with the additional second strand no later than five (5) business days after that date. Commencing operation is defined as setting any emissions unit into operation for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

A.11. 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, that is, the required test report shall be filed with the Department as soon as practical but no later than 45 days after each test is completed.
[Rule 62-297.310(8), F.A.C.]

A.12. Daily/Monthly Log: In order to demonstrate compliance with Specific Condition **A.2.,** the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded.

a. The Daily summary of the log, at a minimum, shall contain the following for EU 008 operations:
    1. Date (Month/Day/Year);
    2. Total coating mixture applied for each coating line (in pounds);
    3. Total daily hours of operation of each coating line;
    4. Total daily hours of operation of the thermal oxidizer; and
    5. Daily average application rate of each coating line (pounds/day)

b. The Monthly summary of the log, at a minimum, shall contain the following for EU 008 operations:

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1. Facility Name, Facility ID No. (i.e., SAPA Precision Tubing, Rockledge, LLC, Facility ID 0090078);
2. Designation of the month and year of operation for which the records are being tabulated;
3. Monthly total of: total VOC emissions; each individual HAP emission; and, total HAPs emissions, in tons/month. The log must include the calculations and references to the supporting documents relied upon to determine the totals emitted.
4. Consecutive 12-month total of VOC emissions; and,
5. Consecutive 12-month total of total HAPS emissions and each individual HAP emission.

The monthly logs shall be completed no later than the end of the following month.

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data is available until such a time as a consecutive 12-month total can be maintained each month.

Supporting documentation (chemical usage tracking logs, Safety Data Sheets (SDS), purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions.

The log and documents shall be kept at the facility for at least five years and made available to the Department upon request. The monthly logs shall be completed by the end of the following month.
[Rule 62-4.070(3) and Chapter 62-210, F.A.C.]

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