TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

Facility ID No. 0090078

PROJECT

Project No. 0090078-008-AC
Application for Minor Source Air Construction Permit
Project Name: Coating Line Modifications

COUNTY

Brevard County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste and Air Resource Programs
Central District Office
Orlando, Florida 32803-3767

February 2, 2015

Prepared by Stephen Amirault, Project Engineer

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

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

I. Project Description:

A. Applicant:

Mr. Scott Church, Plant Director
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Rockledge, FL 32955
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B. Application Professional Engineer of Record

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Environ International Corporation
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C. Application Contact:

Mr. Thomas Cozzie
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D. Project Location:

100 Gus Hipp Boulevard
Rockledge, FL 32955

E. Project Summary:

The proposed permit 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 natural minor source so that it longer requires a Federally Enforceable State Operating Permit (FESOP). The permitted maximum capacity of coating mixture applied at EU-008 changes from 693 lbs/day to 960 lbs/day.

F. Application Information:

Application received on: 12/31/2014
Request for Additional Information issued on: 01/12/2015
Additional information received on: 01/16/2015
Information completeness determination on: 02/06/2015

III. PSD Applicability for Project

As provided in the application, the total project emissions will not exceed the PSD significant emission rates; therefore, the project is not subject to the PSD preconstruction review.

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. – Stationary Source, General Requirements	Y	Not exempt from permitting requirements
Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration	N	Facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	N	There is no applicable source category.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Aluminum extrusion coating operations are a potential source of VOCs and odor.
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Brevard County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category
Rule 62-213, F.A.C. – Operation Permits for Major Source of Air Pollution	N	The new emission limit calculations contained in the application for this permit establish the facility as a minor source for volatile organic compounds (VOCs), total hazardous air pollutants (HAPs), and individual HAPs. The permit limits based on maximum production capability of the two coating lines and recordkeeping requirements will limit the facility's VOC and HAP emissions to less than the threshold limits required for the facility to be considered a major source per Chapter 62-213, F.A.C.

III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tons per year)[1,3]	Allowable Emissions (tons per year)
VOC	EU 008	14.46[1]	Less than 50 (facility-wide)
Total HAP	Facility-wide	11.3[2]	Less than 11.3
Individual HAP	Facility-wide	8[2]	Less than 8
VE	Facility wide		Less than 20%

1. *The potential emissions as provided in the Construction Permit Application, received December 31, 2014. Emissions assume daily usage of 79.2 pounds per day of VOCs based on Silflux 1 coating application. The Silflux 1 coating application has the highest VOC content of the four coatings expected to be applied within this coating line emission unit. The 79.2 pounds per day consists of:*
   i. *34.6 pounds per day from fugitive emissions from the application of precoating material to tubing products prior to coating.*
   ii. *44.3 pounds per day from the Silflux 1 coating mixture application process (comprised of: 2.47 pounds per day from the applicator enclosure, 20.77 pounds per day from fugitive emissions, and 21.01 pounds per day from the drying oven).*
   iii. *0.3 pounds per day from natural gas combustion in the drying oven and the thermal oxidizer for EU 008.*

2. *As provided in response for request for additional information received January 16, 2015, 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.*

3. *The tracking of VOC and HAP emissions based on total coating usage and the production rates for the two coating lines will ensure that the requested VOC, total HAP and individual HAP emission limits will remain significantly less than the major source threshold limits and the facility can be considered a natural minor source. Submission of an Annual Operating Report in order to confirm that annual emissions remain less than major source threshold limits is not required. Instead the record keeping requirements in the permit will be used to ensure the emissions remain less than major source threshold limits.*

IV. Federal NSPS and/or NESHAP Provisions

There are no applicable NSPS or NESHAP provisions.

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will ensure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer, Stephen Amirault, at the Florida Department of Environmental Protection, Waste & Air Resource Programs, Central District Office, 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767, 407/897-4100.