



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Central District
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Electronically Sent- Received Receipt Requested

ttownley@townley.net

FINAL PERMIT

PERMITTEE

Townley Engineering and Manufacturing Co., Inc.
10551 SE 110th Street
Candler, Florida 32111

Authorized Representative:
Mr. Toro Townley, President

Air Permit No. 0830136-006-AF
Permit Expires: 05/31/2016
Site Name: Townley Engineering and
Manufacturing
FESOP (Federally Enforceable state
Operation Permit) Revision
Project Name: Townley #2 FESOP
Revision

This is the final air operation permit revision. Townley Engineering and Manufacturing (Standard Industrial Classification No. 3341) is located in Marion County at 10551 SE 110th Street in Candler, Florida. The UTM coordinates are Zone 17, 404.75 km East, and 3216.26 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.

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



9/20/2013

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

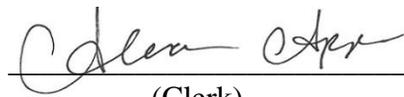
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, 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 9/20/2013 to the persons listed below:

Toro Townley, President, Townley Engineering & Manufacturing: ttownley@townley.net
Veronica Sgro, P.E., Senior Engineer, Koogler & Associates: vsagro@kooglerassociates.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.



(Clerk)

09/20/2013

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

Existing Facility

Established in 1963, Townley Engineering and Manufacturing Company, Inc. is a mining equipment and supplies manufacturer. The facility consists of a rubber shop that includes three operations: (1) fabrication, (2) rubber hose lay-up, and (3) rubber lining. Custom fabrication hose begins with preparation of the flanges and integrated nipples, layup of the hose wear tube, fabric and reinforcement on the appropriate mandrel. When complete the hose is staged in the autoclave. After vulcanization, the hose is removed from the mandrel, inspected and shipped. Rubber lining of pipe and other metal components starts with fabrication or repair on re-lining projects, virgin rubber sheet is accurately cut and applied. The parts are autoclaved and painted to order.

The existing facility consists of the following emissions units.

Facility ID No. 0830136	
ID No.	Emission Unit Description
001	Three Blasting Booths – Blasting Booth No. 1 has a dry cartridge dust collector for dust control. Blasting Booth No. 2 uses a wet cyclone to control particulate emissions. Blasting Booth No. 3 uses a high efficiency dust collector system for dust control. Operation hours for the booths are not limited.
002	Coatings Scavenger/Incinerator – fired by natural gas or propane. Operation hours for the scavenger/incinerator are not limited.

Project Description

This project revises Permit No. 0830136-004-AF by incorporating the equipment changes and conditions of Permit No 0830136-005-AC.

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(PSD), F.A.C.
- This facility is a synthetic non-Title V source for volatile organic compounds (VOCs), Total HAPs, and any individual HAP.
- This facility has three emergency power generators that are spark ignition internal combustion engines (SI ICE). These engines **are not subject** to 40 CFR Part 60, Subpart JJJJ. The main office emergency generator engine (Engine No. 2) was manufactured on January 31, 2008, which predates the Subpart JJJJ applicability date (January 1, 2009) for **emergency engines**. The engines **are subject** to 40 CFR Part 63, Subpart ZZZZ (maintenance requirements listed in Table 2D, No. 5 of the regulation).

SECTION 1. GENERAL INFORMATION

Engine No.	Location	Model	S/N	Engine Power	Purchase Date	Rule Applicability
1	Office Trailer	QT04524ANSN	4707820	45kW	05/10/07	<i>ZZZZ</i>
2	Main Office	QT04524JNSN	4949880	45kW	04/16/09	<i>ZZZZ</i>
3	CNC Shop	QT15068JNSNA	4854428	150kW	03/23/08	<i>ZZZZ</i>

PERMIT HISTORY/AFFECTED PERMITS

Incorporates the conditions of Permit No. 0830136-005-AC with Permit No. 0830136-004-AF.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

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 Project No. 0830136-006-AF.

2. Compliance Authority: 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.) In each document, clearly identify the air Permit Project No. 0830136-006-AF and specific emission unit.
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 Requirement
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation 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.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

7. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports (AORs) shall be submitted electronically to the Compliance Authority by April 1st of each year. Go to the following website for the latest information about electronic submittal of AORs:

<http://www.dep.state.fl.us/air/emission/eaor/default.htm>

[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:
- 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/>*);
 - the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
 - copies of the most recent compliance test reports required by Specific Condition No. **A.8.**, if not previously submitted; and
 - copies of the two most recent months of records/logs specified in Specific Condition No. **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.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS

A. Facility-Wide Conditions

This section of the permit addresses the following emissions units

ID No.	Emission Unit Description
001	Blasting Booths (3) – Blasting Booth No. 1 has a dry cartridge dust collector for dust control. Blasting Booth No. 2 uses a wet cyclone to control particulate emissions. Blasting Booth No. 3 uses a high efficiency dust collector system for dust control. Operation hours for the booths are not limited. Incinerator Scavenger
002	Coatings Scavenger/Incinerator – fired by natural gas or propane. Operation hours for the scavenger/incinerator are not limited.

PERFORMANCE RESTRICTIONS

- A.1. Authorized Fuel: The incinerator shall **only** fire natural gas or propane. [Rules 62-210.200(PTE), F.A.C. and 62-4.070(3), F.A.C.]
- A.2. Restricted Operation: The hours of operation for the emission units are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(247), Potential To Emit, F.A.C.]
- A.3. VOC/HAP Emissions Limitations: The maximum **facility-wide** VOC/HAP emissions shall not exceed the following:

Pollutant	Emissions (tons per any consecutive 12-month period)
Total VOCs	Less than 25.0
Total HAPs	Less than 25.0
Individual HAP	Less than 10.0

[Rules 62-4.070(3) and 62-210.200(247), Potential To Emit, F.A.C.]

- A.4. General Visible Emissions (VE) Limitation for Blasting Booths: Visible emissions for each Blasting Booth are limited to less than 20 percent opacity. [Rule 62-296.320(4)(b)1., F.A.C.]
- A.5. VE Limitation for Incinerator: Visible emissions for the incinerator shall not exceed 5 percent opacity except that visible emissions not exceeding 15 percent opacity are allowed for up to six minutes in any one-hour period. [Rule 62-296.401(1)(a), F.A.C.]
- A.6. Unconfined Emissions of Particulate Matter: No person shall cause, let, suffer or allow the emissions of unconfined particulate matter from any or activity, including, but not limited to, vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Pursuant to rule 62-296.320(4)(c)1., 3., and 4., F.A.C., reasonable precautions to prevent unconfined emissions of particulate matter at this facility include the following requirements:

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS

A. Facility-Wide Conditions

- a. Use of hoods, fans or filters, and similar equipment to contain, capture and/or vent particulate matter; and containing abrasive blast material where possible. Conduct a monthly visual inspection of each filter used in the filter systems for the blasting booths.
- b. Paving and maintenance of roads, parking areas and yards.

[Rules 62-4.070(3) and 62-296.320(4)(c)1., 3., and 4., F.A.C.]

- A.7. Circumvention: No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

TESTING REQUIREMENTS

- A.8. Compliance Testing for Incinerator: During each federal fiscal year (October 1st to September 30th), the incinerator, EU 002, shall be tested to demonstrate compliance with the emissions standard for visible emissions specified in Specific Condition **A.5**. [Rule 62-297.310, F.A.C.]

- A.9. Test Method: Required tests shall be performed in accordance with the following reference methods.

Methods	Description of Method and Comments
EPA Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources EPA Method 9 shall be conducted for at least thirty minutes.

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 methods 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.10. Test Notification: The permittee shall notify the Compliance Authority, at least 15 days prior to the date on which each formal compliance test is to begin. The notification shall include the following information: date, time, and location of each such test; and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator; and the name, company, and the telephone number of the person conducting the test. [Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

- A.11. Test Reports: The permittee shall prepare and submit reports for all required tests (**A.8.**) in accordance with the requirements specified in Appendix D (Common Testing Requirements) of

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS

A. Facility-Wide Conditions

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 the last sampling run of each test is completed.” [Rule 62-297.310(8), F.A.C.]

- A.12. Monthly Log: In order to demonstrate compliance with Specific Condition Nos. **A.1.** and **A.3.**, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall be made available to the Department upon request. The log shall contain the following:
- a. Facility Name, Facility ID No. (i.e., 0830136);
 - b. Month and year of record;
 - c. Monthly total of VOC emissions (tons/month);
 - d. Most recent consecutive 12-month total of VOC emissions (tons/consecutive 12-month period);
 - e. Monthly total of individual HAPs and combined HAP emissions (tons/month);
 - f. Most recent consecutive 12-month total of individual HAPs and combined HAP emissions (tons/consecutive 12-month period);
 - g. Type and quantity of fuel fired by the incinerator for a one-month period;
 - h. Type and quantity of fuel fired by the incinerator for a consecutive 12-month period; and
 - i. Record observation details of each filter visual inspection (see Condition **A.6.a.**). When a filter is replaced, make a note of the replacement in the log.

The monthly logs shall be completed by 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 consecutive 12-month total is not a year-to-date total. Facilities or emission units that have not been operating for 12 months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month. [Rule 62-4.070(3), F.A.C.]

- A.13. Additional Recordkeeping Requirements: Records specified in Specific Condition No. **A.12.** (previous condition) must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those used to derive emissions, must be clearly documented, and may be presented in the form of a

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS

A. Facility-Wide Conditions

template of sample calculations and available for review on site by the Department.
[Rule 62-4.070(3), F.A.C.]

- A.14. Annual Log: In order to demonstrate compliance with the maintenance requirements of 40 CFR 63, Subpart ZZZZ, the following must be documented for the emergency engines:
- a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first;
 - b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63, Subpart ZZZZ, Table 2D, No. 5]

SECTION 4. APPENDICES

Contents

- Appendix A. Citation Formats and Glossary of Common Terms
- Appendix B. General Conditions
- Appendix C. Common Conditions
- Appendix D. Common Testing Requirements

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CITATION FORMATS

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located

“2222” represents the specific facility ID number for that county

“001” identifies the specific permit project number

“AC” identifies the permit as an air construction permit

“AF” identifies the permit as a minor source federally enforceable state operation permit

“AO” identifies the permit as a minor source air operation permit

“AV” identifies the permit as a major Title V air operation permit

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° **F:** degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

CAA: Clean Air Act

CMS: continuous monitoring system

CO: carbon monoxide

CO₂: carbon dioxide

COMS: continuous opacity monitoring system

DARM: Division of Air Resource Management

DEP: Department of Environmental Protection

Department: Department of Environmental Protection

dscf: dry standard cubic feet

dscfm: dry standard cubic feet per minute

EPA: Environmental Protection Agency

ESP: electrostatic precipitator (control system for reducing particulate matter)

EU: emissions unit

F.A.C.: Florida Administrative Code

F.A.W.: Florida Administrative Weekly

F.D.: forced draft

F.S.: Florida Statutes

FGD: flue gas desulfurization

FGR: flue gas recirculation

Fl: fluoride

ft²: square feet

ft³: cubic feet

gpm: gallons per minute

gr: grains

HAP: hazardous air pollutant

Hg: mercury

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

ID: induced draft	PSD: prevention of significant deterioration
ID: identification	psi: pounds per square inch
kPa: kilopascals	PTE: potential to emit
lb: pound	RACT: reasonably available control technology
MACT: maximum achievable technology	RATA: relative accuracy test audit
MMBtu: million British thermal units	RBLC: EPA's RACT/BACT/LAER Clearinghouse
MSDS: material safety data sheets	SAM: sulfuric acid mist
MW: megawatt	scf: standard cubic feet
NESHAP: National Emissions Standards for Hazardous Air Pollutants	scfm: standard cubic feet per minute
NO_x: nitrogen oxides	SIC: standard industrial classification code
NSPS: New Source Performance Standards	SIP: State Implementation Plan
O&M: operation and maintenance	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
O₂: oxygen	SO₂: sulfur dioxide
Pb: lead	TPD: tons/day
PM: particulate matter	TPH: tons per hour
PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less	TPY: tons per year
ppm: parts per million	TRS: total reduced sulfur
ppmv: parts per million by volume	UTM: Universal Transverse Mercator coordinate system
ppmvd: parts per million by volume, dry basis	VE: visible emissions
QA: quality assurance	VOC: volatile organic compounds
QC: quality control	

SECTION 4. APPENDIX B

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
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:
 - a. A description of and cause of noncompliance; and
 - b. 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.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or

SECTION 4. APPENDIX B

General Conditions

Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX C

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
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.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
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.]
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.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:**
 - a. 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.
 - b. 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.
 - c. Reasonable precautions include the following:
 - (1) Paving and maintenance of roads, parking areas and yards.
 - (2) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.

SECTION 4. APPENDIX C

Common Conditions

- (3) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
- (4) 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.
- (5) Landscaping or planting of vegetation.
- (6) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- (7) Confining abrasive blasting where possible.
- (8) Enclosure or covering of conveyor systems.

[Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 3 years following the date on which such measurements, records, or data are recorded, unless otherwise specified by Department rule. Records shall be made available to the Department upon request. [Rule 62-4.160, F.A.C.]
11. Emissions Computation and Reporting:
 - a. *Applicability*. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]
 - b. *Computation of Emissions*. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
 - (1) *Basic Approach*. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
 - (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 - (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (2) *Continuous Emissions Monitoring System (CEMS)*.
 - (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:

SECTION 4. APPENDIX C

Common Conditions

- 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
 - 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
- 1) A calibrated flow meter that records data on a continuous basis, if available; or
 - 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) Mass Balance Calculations.
- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
- 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
- (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
- (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
- 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.

SECTION 4. APPENDIX C

Common Conditions

- 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
- b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - a. All Title V sources.
 - b. All synthetic non-Title V sources.
 - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
 - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

SECTION 4. APPENDIX D
Common Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units at the facility.

COMPLIANCE TESTING REQUIREMENTS

1. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62-297.310(2), F.A.C.]
2. **Applicable Test Procedures - Opacity Compliance Tests:** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4), F.A.C.]

3. **Determination of Process Variables:**
 - a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

4. **Frequency of Compliance Tests:** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
 - a. *General Compliance Testing.*
 1. The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.
 2. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to sub-subparagraph 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department

SECTION 4. APPENDIX D
Common Testing Requirements

shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- (a) Did not operate; or
 - (b) In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours,
3. During each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for visible emissions, if there is an applicable standard.
4. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of 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 owner or operator.
- b. *Special Compliance Tests.* When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

[Rule 62-297.310(7), F.A.C.]

RECORDS AND REPORTS

5. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report shall provide the following information.
- a. The type, location, and designation of the emissions unit tested.
 - b. The facility at which the emissions unit is located.
 - c. The owner or operator of the emissions unit.
 - d. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - e. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - f. The date, starting time and end time of the observation.
 - g. The test procedures used.
 - h. The names of individuals who furnished the process variable data, conducted the test, and prepared the report.
 - i. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
 - j. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Townley Engineering and Manufacturing Company, Inc.
10551 SE 110th Street
Candler, FL 32111

Townley Engineering and Manufacturing

Facility ID No. 0830136

PROJECT

Project No. 0830136-006-AF
Application for Non-Title V Air Operation Permit Revision
Project Name: Townley #2 FESOP Revision

COUNTY

Marion County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste and Air Resource Programs
Central District Office
Orlando, Florida 32803-3767
DEP_CD@dep.state.fl.us

September 9, 2013

Prepared by Jeff Rustin, P.E.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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. Toro Townley, President
Townley Engineering and Manufacturing Company, Inc.
10551 SE 110th Street
Candler, FL 32111
ttownley@aol.com

B. Professional Engineer:

Ms. Veronica N. Sgro, P.E., Senior Engineer
Koogler and Associates
4014 NW 13th Street
Gainesville, FL 32609
vsgro@kooglerassociates.com

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

C. Project Location:

10551 SE 110th Street
Candler, FL 32111

D. Project Summary:

This project (revision) incorporates conditions from Construction Permit No. 0830136-005-AC into Permit No. 0830136-004-AF.

E. Application Information:

Application Received and Complete on: 07/03/2013
Application Complete: 07/03/2013

II. PSD Applicability for Project

No increase in air emissions; therefore, this project is not subject to PSD preconstruction review.

III. Rule Applicability

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

Subject to:	Y/N	Comments
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	Y	The facility is a potential source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	The incinerator and paint/solvents are sources of VOCs and odors.
Rule 62-296.400, F.A.C. – Stationary Source Emission Standards	Y	EU No. 002 is subject to Rule 62-296.401, F.A.C. – Incinerators. It is a unit specific requirement.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Marion County is an attainment area for ozone

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Subject to:	Y/N	Comments
Rule 62-204.800(8), F.A.C. - Standards of Performance for New Stationary Sources (NSPS – 40 CFR 60)	N	The facility’s three spark ignition internal combustion engines are <u>not</u> subject to 40 CFR 60, Subpart JJJJ because the engines were manufactured prior to January 1, 2009, the emergency engine applicability date (§60.4230 (4)(iv)). The No. 2 engine was manufactured on January 31, 2008.
Rule 62-204.800(11), F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	Y	The facility’s three spark ignition internal combustion engines are subject to 40 CFR 63, Subpart ZZZZ. The requirements are listed in Table 2D, No. 5 of the regulation.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	Facility is a synthetic minor source.
Rule 62-297.310, F.A.C. – General Compliance Test Requirements	Y	Annual Visible Emission Test for the incinerator. The annual frequency is listed in Rule 62-296.401(c), F.A.C.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Actual Emissions * (tons/year)	Major Source Thresholds (tons/year)
PM	Facility	1.79056	100
VOC	Facility	0.0088	100
NOx	Facility	0.1600	100
Total HAPs	Facility	0.00288	25
CO	Facility	0.1344	100

*based on data in ARMS database

I reviewed data in the ARMS database for calendar year 2012.

V. Discussion

The current operating permit is a Federally Enforceable State Operation Permit. Potential emissions are below major source levels; however, the applicant has not requested a change in the facility classification. It is classified as a synthetic Non-Title facility. I did not see a recent annual visible emission test in the ARMS database for the incinerator as required by the permit.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

VI. Federal NSPS and/or NESHAP Provisions

- A. Facility's incinerator is by definition a small incinerator with a charging rate of less than (50) tons per day and therefore, is not subject to 40 CFR 60, Subpart E – Standards of Performance for Incinerators.

- B. The facility's three spark ignition internal combustion engines are subject to 40 CFR 63, Subpart ZZZZ.

VII. Conclusions

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

VII. 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 at the Florida Department of Environmental Protection, Waste & Air Resource Programs, Central District Office, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767, by e-mail at jeff.rustin@dep.state.fl.us or by phone at 407-897-4100.