Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

NOTICE OF DRAFT PERMIT REVISION

Mr. John Taylor, Executive Vice President
High Performance Systems, Inc.
1201 American Superior Boulevard
Winter Haven, FL 33884

Ref: Revision to Construction Permit 1050158-001-AC
DEP Project File No. 1050158-007-AC
Winter Haven Facility

Dear Mr. Taylor:

On January 27, 2012, the Department received a Title V air pollution permit renewal application (DEP Project File No. 1050158-006-AV) from High Performance Systems, Inc. for a conveyorized extruded aluminum metal finishing plant located in Polk County at 1201 American Superior Boulevard, Winter Haven. Review of the application and the current Title V permit 1050158-005-AV revealed the following changes to Construction Permit No. 1050158-001-AC are necessary: 1) Clarify the allowable VOC emission limitations are for Emission Unit No. 001 verses the entire facility; 2) Modify the visible emission standards for Emission Unit Nos. 002 and 003; 3) Delete the regularly scheduled visible emission testing requirements; 4) Change the dry-off oven from a regulated activity, which is part of Emission Unt No. 002, to an insignificant activity; and 5) Establish the Paint Bake Oven's afterburner shall be operating whenever the oven is operating. Therefore, the following conditions in Construction Permit No. 1050158-001-AC are changed:

<u>SPECIFIC CONDITION No. 3:</u>

FROM: Pursuant to Rule 62-296.320, F.A.C. and application dated May 17, 1996, volatile organic compounds/organic chemical (VOC/OC) emission from this facility, including paint spray booths, drying ovens, touch-up booths, paint mix room, and use of cleanup solvents shall not exceed 193.4 pounds/hour** and 240.0 tons for any 12 consecutive-month period.

** This value is a daily average derived from monthly operating time.

TO: Volatile organic compound (VOC) emissions from Emission Unit No. 001, including paint spray booths, touch-up booth, paint mix room, and use of cleanup solvents shall not exceed

193.4 pounds/hour (monthly average basis) and 240.0 tons for any consecutive 12-month period.
[Rule 62-210.200(PTE), F.A.C.]

SPECIFIC CONDITION No. 4:

FROM: Visible emissions from the batch bake-off incinerator (Stack No. 9) and the Tank No. 3/paint bake oven/afterburner (Stack No. 8) shall each not exceed 5% opacity except that visible emissions not exceeding 20% opacity are allowed for up to three minutes in any one hour period.
[Rule 62-296.401(1)(a), F.A.C.]

TO: Visible emissions from the Paint Spray Booth Nos. 1 -5 (Stack Nos. 1 – 6), paint mix room (Stack No. 7), paint stripping furnace (Stack No. 9) and the Tank No. 3/paint bake oven/afterburner (Stack No. 8) shall not be equal to or exceed 20% opacity. In order to provide reasonable assurance that the emission activities are being properly operated, visible emissions should not exceed 5% opacity. If the 5% value is exceeded it will not be considered a violation in and of itself, but an indicator that additional controls and/or visible emission testing may be required.
[Rules 62-4.070(3) and 62-296.320(4)(b), F.A.C.]

SPECIFIC CONDITION No. 6:

FROM: The Batch Bake-off Incinerator (0.35 MMBTU/hr.), the Paint Bake Oven (4 MMBTU/hr.), Paint Bake Oven Afterburner (5 MMBTU/hr.), Dry-off Oven (1 MMBTU/hr.), and heated liquid tanks shall be fueled primarily with natural gas. Propane may be used as an alternative fuel during times of natural gas curtailment.
[Permit AO53-200881 and application dated May 17, 1996]

TO: The Paint Stripping Furnace, the Paint Bake Oven, Paint Bake Oven Afterburner, and heated liquid tanks shall be fueled primarily with natural gas. Propane may be used as an alternative fuel during times of natural gas curtailment.
[Rule 62-210.200 (PTE), F.A.C.]

SPECIFIC CONDITION No. 7:

FROM: The after burner shall, whenever possible, be operated when the Paint Bake Oven is in operation, and shall be maintained at a minimum temperature of 1340° F (1050° F indicated).
[Permit AO53-200881]

TO: The afterburner shall be operating whenever the Paint Bake Oven is in operation, and shall be maintained at a minimum temperature of 1,340°F (1,050°F indicated).
[Rule 62-296.320(1)(a), F.A.C.]

SPECIFIC CONDITION No. 12:

FROM: Annually, within 60 days of July 10th, test the Binks Spray Booths (Stack Nos. 1-4), The Batch Bake-off Incinerator (Stack No. 9) and the Tank No. 3/paint Bake Oven/Afterburner (Stack No. 8) for visible emissions. Testing shall be conducted within 60 days prior to the anniversary date of the initial testing. Submit 2 copies of the test data to this office within 45 days of suck testing. Testing procedures shall be consistent with the requirements of Section 62-297, F.A.C. [Rule 62-297.340 and Rule 62-297.570(2), F.A.C.]

TO: DELETE

SPECIFIC CONDITION No. 13:

FROM: Compliance with the emission limitation of Specific Conditions No. 4 & 5 shall be determined using DEP Method 9 contained in Rule 62-297, F.A.C**.** The visible emissions compliance test shall be conducted by a certified observer and be a minimum of 30 minutes in duration for Stacks 1-4 and 60 minutes for Stacks 8 & 9. The visible emissions compliance test shall be conducted by a certified observer. The minimum requirements for stationary point source emissions test procedures and reporting shall be in accordance with Rule 62-297, F.A.C**.** [Rule 62-297.310(4)(A)2. and Rule 62-297.310(4)(A)2., F.A.C.]

TO: If requested, visible emission testing shall be conducted using EPA Method 9 contained in Chapter 62-297, F.A.C**.** The test shall be conducted by a certified observer and be a minimum of 30 minutes in duration. The minimum requirements for stationary point source emissions test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C**.** [Rule 62-297.310, F.A.C.]

SPECIFIC CONDITION No. 14:

FROM: The compliance tests required in Specific Condition No. 12 shall be conducted when the batch bake-off oven and Tank No. 3/paint bake oven/afterburner are operating within 90-100% of their maximum heat input rate, 0.35 MMBTU/hr., 780 BTU/hr., 4.0 MMBTU/hr., and 5.0 MMBTU/hr., respectively. Test the Binks Spray Booth exhausts while spraying sufficient paint to release 90-100% of the permitted VOC emissions level of 193.4 pounds/hour. Failure to state the heat input rates or paint usage during the compliance tests may invalidate the data. [Rule 17-4.070(3), F.A.C**.**]

TO: DELETE

SPECIFIC CONDITION No. 18:

FROM: Compliance with Specific Conditions Nos. 3, 4, and 5 above shall be demonstrated by submitting to this office a copy of the records specified in Specific Condition No. 16**,** documenting at least 2 months of operation in a manner consistent with the requirements of this permit. The records shall be included with the visible emissions test reports specified above, and shall be submitted to this office within 45 days of visible emissions testing. [Rules 62-297.310(7)(a) and 62-297.310(8)(b), F.A.C.]

TO: DELETE

Upon issuance of this final permit revision, 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.

This letter must be attached to and becomes a part of Construction Permit No. 1050158-001-AC. If you have any questions, please contact permit engineer specialist, Jim McDonald, at jim.mcdonald@dep.state.fl.us, or by phone at (813)632-7600 extension 106.

Executed in Hillsborough County, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

DRAFT

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Robert C. Wong
District Air Program Administrator
Southwest District

RCW/jm

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit Revision was sent by electronic mail before the close of business on _____ to the person(s) listed:

Mr. John Taylor, Executive Vice President, High Performance Systems, Inc.
jtaylor@hpscoatings.com

Mr. Lynn Robinson, P.E., Southern Environmental Sciences, Inc.
lrobinson@sesfla.com

Clerk Stamp

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

DRAFT _____

(Clerk) (Date)