Greif Packaging LLC

Facility ID No. 1050175
Polk County

Title V Air Operation Permit Renewal

Permit No. 1050175-012-AV
(Renewal of Title V Air Operation Permit No. 1050175-010-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Southwest District Office
Air Resource Management Section

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 632-7600
Fax: (813) 632-7668

Compliance Authority:

State of Florida
Department of Environmental Protection
Southwest District Office
Compliance and Enforcement Section – Attention: Air

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 632-7600
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DRAFT/PROPOSED PERMIT

PERMITTEE:
Greif Packaging LLC
211 Sandra Jackson Road
Auburndale, Florida 33823

Permit No. 1050175-012-AV
Facility ID No. 1050175
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. This existing facility is located in Polk County at 211 Sandra Jackson Road in Auburndale, Florida. UTM Coordinates are: Zone 17, 17, 422.79 East and 3102.85 North. Latitude is: 28° 02' 55.59" North; and, Longitude is: 81° 47' 08.37" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE, 20xx
Renewal Application Due Date: Exp. Date -225 days, 20xx
Expiration Date: Eff. Date + 5 years, 20xx

(Draft/Proposed)

_____

Kelley M. Boatwright
District Air Program Administrator
Southwest District

KMB/drz

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This facility is a metal drum container manufacturing and coating operation consisting of two drum paint spray booths, one lid paint spray booth, and two (2) curing ovens.

Fabricated drums and lids are sprayed with an interior surface coating and painted on the outside surfaces in the spray application booths. They are then conveyed through curing ovens. The drying ovens are natural gas fired, each with a burner with a heat input rating of 5.4 MMBtu/hour.

Based on previous Title V permit applications and the Title V permit renewal application dated January 31, 2013, this facility is a major source of Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs).

Subsection B. Summary of Emissions Units.

EU ID No.	Brief Description
Regulated Emissions Units	
007	Paint Spray Booths
008	Curing Oven B
009	Curing Oven E

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received February 1, 2013, this facility is a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU ID No(s).
Federal Regulations	
40 CFR 63 Subpart A, NESHAP General Provisions	007
40 CFR 63 Subpart MMM - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products	007
State Regulations	
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	All

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices - The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. **Not federally Enforceable.** 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. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The permittee shall comply with the following operating procedures and work practices relating to VOC use and emissions:

a. All materials containing VOC shall be stored in closed containers and/or in small automatic closing safety cans.

b. Clean-up solvent washings shall be directed into containers that prevent evaporation into the atmosphere.

c. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of materials.

d. Immediately attend to all spills as appropriate.

e. Work practice controls, when practicable, shall include limiting the amount of clean-up solvents issued to employees.

f. Doors and windows shall be closed whenever feasible to insure that VOC materials are captured and exhausted through exhaust stack(s) with adequate dispersion.

[Rule 62-296.320(1), F.A.C.; Construction Permit 1050175-007-AC]

FW4. 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. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter - 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. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the use of paint spray booth filter systems to control overspray emissions.
[Rule 62-296.320(4), F.A.C.; Construction Permit 1050175-007-AC]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report - The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.
[Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee - The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm.
[Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance - The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA) - If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

***IMPORTANT NOTES TO PERMITTEE*:**

Permit Renewal - see Appendix TV, Condition No. TV18.
(Note: Renewal application is due 225 days prior to expiration date of this permit.)

Title V Semi-Annual Monitoring Reports – see Appendix RR, Condition No. RR4.

NESHAP Semi-Annual Compliance Reports - see Appendix 40 CFR 63 Subpart MMMM Sections 63.3920 for semi-annual compliance reporting requirements associated with Federal NESHAP 40 CFR 63 Subpart MMMM.

Subsection A. Emissions Unit No. 007 – Paint Spray Booths

The specific conditions in this section apply to the following emissions unit (EU):

EU ID No.	Brief Description
007	Paint Spray Booths – Fabricated drums and lids are sprayed with an interior surface coating and painted on the outside surfaces in the spray booths shown below. The spray booths are equipped with filter panels to control overspray. Spray Booths: Drum shell interior coating paint spray booth (Line B) Drum shell interior coating paint spray booth (Line E Lids paint spray booth

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation - This emissions unit is permitted to operate continuously (i.e., 8,760 hours/year). [Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit No. 1050175-007-AC]

A.2. Permitted Production Rate - The production of drums, completely fabricated and with interior and exterior coating applied to drum body and lid, shall not exceed 500 drums per hour (monthly average basis*).

(Note: Monthly average production rate is the number of drums processed during the month, divided by the hours of drum production operation for the month.)*

[Rules 62-4.160(2) and 62-210.200 (Potential to Emit), F.A.C.; Construction Permit No. 1050175-007-AC]

Emission Limitations and Standards

(Permitting Note - The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

A.3. Volatile Organic Compound (VOC) Emissions - Emissions of VOC shall not exceed 196.6 tons per any consecutive 12-month period. Total VOC shall be determined by the sum of the VOC in coatings and solvents used for equipment cleaning minus the VOC in any solvents recycled or disposed of as hazardous waste.
[Rule 62-210.200 (Potential to Emit), F.A.C.; Construction Permit No. 1050175-007-AC]

Recordkeeping Requirements

A.4. Production Records - The permittee shall keep daily production records in order to document compliance with the production limitations of Specific Condition No. A.2. The records shall include daily operating hours (operating hours are defined as any period during which drums are being manufactured) and daily drum production. At the end of each month a monthly average hourly drum production rate (average drums/hour) shall be calculated based on the monthly totals of the daily operating hours and daily production values (i.e. monthly total drums manufactured/monthly total operating hours).
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050175-007-AC]

A5. Volatile Organic Compound Emission Records - The permittee shall keep a record of VOC containing material usage to document compliance with the limitations of Specific Condition No. A.3. At a minimum, the records shall record the following:

Monthly Records

a. Record the total quantity, in pounds, of each VOC containing material used.

b. The records shall show the VOC content (% by weight) of coatings and solvents used.

c. Calculate (based on a. and b. above) and record the monthly total quantity, in pounds, of VOC for each of the above materials.

d. Calculate and record the most recent consecutive 12- month period VOC emission rate (tons/consecutive 12-month period).

General Requirements

e. Each record, where applicable, shall have attached the documentation for all chemicals captured for disposal or recycle.

f. The monthly records shall be completed by the end of the following month. Supporting documentation (MSD Sheets, purchase orders, etc.) shall be kept for each material which includes sufficient information to determine VOC emissions.

g. The records shall be retained on file at the facility for at least five (5) years and shall be made available for inspection upon request.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050175-007-AC]

Other Requirements

A6. Hazardous Air Pollutants (HAP) Emission Standards: 40 CFR 63 NESHAP Requirements - This emission unit is subject to and shall comply with the applicable requirements *(see below)* of 40 CFR 63 Subpart MMMM National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, as adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C., contained in the attached Appendix 40 CFR 63 Subpart MMMM, which is a part of this permit.

See the following attached appendix:

APPENDIX NESHAP 40 CFR 63 Subpart MMMM -

40 CFR 63 Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products *(also includes table of applicable provisions of 40 CFR 63 Subpart A - General Provisions to 40 CFR 63 NESHAPs)*.

40 CFR 63 Subpart MMMM Applicable Provision References [1, 2]

*([1] **NOTE:** Entire section applies unless otherwise noted with specific applicable subsection references below the section title.)*

40 CFR 63 Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

What This Subpart Covers

63.3880 What is the purpose of this subpart?

63.3881 Am I subject to this subpart?
63.3882 What parts of my plant does this subpart cover?
63.3883 When do I have to comply with this subpart?

Emission Limitations
63.3890 What emission limits must I meet?
63.3890(b) and (c)
63.3891 What are my options for meeting the emission limits?
63.3891(a) or (b)

General Compliance Requirements
63.3900 What are my general requirements for complying with this subpart?
63.3900(a)(1)
63.3901 What parts of the General Provisions apply to me?

Notifications, Reports, and Records
63.3920 What reports must I submit?
63.3920(a)
63.3930 What records must I keep?
63.3930(a) through (h), and (j)
63.3931 In what form and for how long must I keep my records?

Compliance Requirements for the Compliant Material Option
63.3941 How do I demonstrate initial compliance with the emission limitations?
63.3942 How do I demonstrate continuous compliance with the emission limitations?

Compliance Requirements for the Emission Rate Without Add-On Controls Option
63.3951 How do I demonstrate initial compliance with the emission limitations?
63.3952 How do I demonstrate continuous compliance with the emission limitations?

Other Requirements and Information
63.3980 Who implements and enforces this subpart?
63.3981 What definitions apply to this subpart?

Tables and Appendices to Subpart MMMM of Part 63 –
Table 2 to Subpart MMMM of Part 63—Applicability of General Provisions to Subpart MMMM of Part 63
Table 3 to Subpart MMMM of Part 63--Default Organic HAP Mass Fraction for Solvents and Solvent Blends
Table 4 to Subpart MMMM of Part 63--Default Organic HAP Mass Fraction for Petroleum Solvent Groups

Appendix B to Subpart MMMM of Part 63--Applicability of 40 CFR 63 Subpart A General Provisions to Subpart MMMM of Part 63

([2] Permitting Note: The above applicability references are based upon current operations as reflected in the Title V permit renewal application dated January 13, 2013. Any change in operations may change the applicable provisions.)

[Rule 62-204.800(11)(b), F.A.C.; 40 CFR 63 Subpart MMMM and Subpart A]

The specific conditions in this section apply to the following emissions units (EUs):

EU ID No.	Brief Description
008 & 009	Curing Oven B (EU No. 009) and Curing Oven E (EU No. 009 – Painted drums and drum lids are conveyed through high temperature curing ovens for curing of the drum shell interior coat (Curing Oven B) and drum shell exteriors coat (Curing Oven E). Curing Ovens B and E are fired with natural gas or propane. Each oven has a burner heat input rating of 5.4 MMBtu/hour. Emissions from all oven exhausts are uncontrolled.

Essential Potential to Emit (PTE) Parameters

B.1. Hours of Operation - There is no restriction on the operating hours for the Ennis Container, Inc. plant (i.e., permitted for 8,760 hours per year).
[Rule 62-210.200 (Potential to Emit), F.A.C.; Construction Permit No. 1050175-007-AC]

B.2. Permitted Fuel - Curing Ovens B and E shall be fired on natural gas or propane only.
[Rules 62-4.160(2) and 62-210.200 (Potential to Emit), F.A.C.; Construction Permit No. 1050175-007-AC]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary*

Appendix I, List of Insignificant Emissions Units and/or Activities*

Appendix NESHAP 40 CFR 63 Subpart A – General Provisions

Appendix NESHAP 40 CFR 63 Subpart MMMM

Appendix RR, Facility-wide Reporting Requirements*

Appendix TR, Facility-wide Testing Requirements*

Appendix TV, Title V General Conditions*

* Included in one combined electronic document entitled: 1050175.012.av.appendices.doc.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Figure 1, Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance (40 CFR 60, July, 1996).

Statement of Basis

Table H, Permit History.

Table 1, Summary of Air Pollutant Standards and Terms.

Table 2, Compliance Requirements.