Industrial Container Services – Lakeland, LLC

Facility ID No. 1050208

Polk County

Title V Air Operation Permit Renewal

Permit No. 1050208-017-AV

(Renewal of Title V Air Operation Permit No. 1050208-012-AV as revised by Title V Operation Permit No. 1050208-016-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:
Industrial Container Services – Lakeland, LLC
PO Box 2006
Auburndale, Florida 33823

Permit No. 1050208-017-AV
Industrial Container Services – Lakeland, LLC
Facility ID No. 1050208
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. The Industrial Container Services – Lakeland, LLC facility is located in Polk County at 2006 Thornhill Road, Auburndale, Florida. UTM Coordinates are: Zone 17, 419.48 East and 3103.34 North. Latitude is: 28° 03' 10.6" North; and, Longitude is: 81° 49' 09.6" 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
Air Program Administrator
Southwest District

KMB/nek

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

Industrial Container Services operates a metal drum refinishing facility. A metal drum reconditioning furnace is used to remove existing paint and residual material from the drums prior to cleaning and coating. Drums and lids are cleaned in shotblast machines, coated in paint spray booths, and dried in drying ovens (2). Drum rings are coated by dipping into a dip tank. Cleaning solvents are used throughout the facility, primarily for cleaning paint spray guns.

Subsection B. Summary of Emissions Units (EUs).

EU ID No.	Brief Description
Regulated Emissions Units	
001	Drum Reconditioning Furnace
002	Automated Paint Spray Booth
006	Lid Paint Spray Booth
009	Ring Dip Tank
010	Cleaning Solvent Usage

Note: Emission Unit No. 007, Lid Paint Spray Booth #2 is no longer used and has been removed from this permit.

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received January 10, 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 Nos.
NESHAP 40 CFR 63, Subpart A – General Provisions	002, 006, 009, 010
NESHAP 40 CFR 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products	002, 006, 009, 010
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	All

Note: The drum reconditioning furnace and two drying ovens at this facility are not subject to NESHAP 40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. They do not meet the definition of process heaters contained in 40 CFR 63.7575 (combustion gas does come into direct contact with process materials).

SECTION II. FACILITY-WIDE CONDITIONS.

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.

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

b. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.

c. Tightly cover or close all VOC containers when they are not in use.

d. Prevent excessive air turbulence across exposed VOC.

e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling, or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit No. 1050208-013-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 following measures.

a. Vehicle parking areas are paved.

b. Abrasive blasting processes are confined to enclosed blaster units and equipped with dust collectors.

c. If weather conditions are such that unpaved roads within the facility become a continuing source of particulate emissions, application of water will be used for suppression.

[Rule 62-296.320(4)(c), F.A.C., and proposed by applicant in Title V air operation permit application received January 10, 2013]

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. and 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]

Subsection A. Emissions Unit No. 001 – Drum Reconditioning Furnace

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

EU ID No.	Brief Description
001	This emissions unit consists of a Spencer Boiler and Engineering, Inc., Model No. SBCO450, metal drum reconditioning furnace. The furnace is used to remove paint and residual material from used drums prior to coating them. The drums move through the furnace on a conveyor system and residual material is pyrolized in the primary chamber. The primary chamber contains several zones in which the drums are heated and then cooled. The products of incomplete combustion generated by the pyrolysis process are controlled in the secondary chamber by a direct-flame afterburner. The secondary chamber provides a one-second residence time at 1450° F. The furnace and afterburner are fired with natural gas at a combined maximum heat input of 16.0 MMBtu/hour (6.0 MMBtu/hr furnace and 10.0 MMBtu/hour afterburner).

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity - The maximum operation rate of the drum reconditioning furnace shall not exceed 450 drums/hour (daily average basis).
[Rules 62-4.160(2), 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1050208- 015-AC]

A.2. Authorized Fuel -The furnace and afterburner shall be fired with natural gas only.
[Rule 62-213.440, F.A.C.; Construction Permit No. 1050208-015-AC]

A.3. Permitted Hours of Operation - The drum reconditioning furnace unit shall not be operated more than 2,844 hours per consecutive 12-month period. Operation is defined as any period that drums are being processed through the drum furnace.
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1050208-015-AC]

Control Technology

A.4. Minimum Secondary Chamber Operating Temperature **-** The minimum operating temperature of the secondary chamber shall be 1450° F when the reconditioning furnace is in operation.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050208-015-AC]

Monitoring of Operations

A.5. Secondary Chamber Temperature Monitoring - The permittee shall operate and maintain a continuous chart recording device for monitoring the secondary chamber (afterburner) temperature. The operator shall initial and mark the chart upon initial introduction of drums after startup and again upon completion of drum processing through the furnace. Said recordings shall be maintained as records for a period of five years and shall be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050208- 015-AC]

Recordkeeping and Reporting Requirements

A.6. Drum Reconditioning Furnace Operation Records - In order to document compliance with Specific Condition Nos. A.1. and A.3., the permittee shall keep the following records of drum reconditioning furnace hours of operation and the number of drums processed through the drum furnace.

Daily

a. hours of operation of the drum furnace (hours) (defined as any period that drums are being processed through the drum furnace);

b. number of drums processed through the drum furnace (drums);

c. daily average drums/hour drum processing rate, from a. and b. above (drums/hour);

Monthly

e. total drum furnace operating hours for the month (hours/month); and

f. total drum furnace operating hours for the most recent consecutive 12-month period (hours/consecutive 12- month period).

The above records shall be maintained in a form suitable for inspection. Daily records shall be completed within 3 business days. Monthly records shall be completed by the 15th day of the following month. The records shall be kept at the facility for a minimum of five years and be made available to the Department upon request.

[Rules 62-4.070(3), 62-213.440(1)(b)2.b., F.A.C.; Construction Permit No. 1050208-015-AC]

(Recordkeeping Note - See also Specific Condition No. A.5., for secondary chamber temperature monitoring recordkeeping requirements.)

Other Requirements

A.7. Hazardous Waste Restrictions - Drums that contain residues that are hazardous wastes as defined in 40 CFR 261, Subparts C and D, are allowed to be incinerated only if those drums meet the definition of empty containers as defined in 40 CFR 261.7*. If the drums containing hazardous waste residues do not meet the empty drum criteria, the drums shall not be incinerated unless the facility obtains a hazardous waste incinerator permit in accordance with 40 CFR 264, Subpart O, and Rule 62-730.240, F.A.C.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050208-015-AC]

**(Note: Drums are considered "empty containers" if all wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating, and no more than 2.5 centimeters (one inch) of residue remain on the bottom of the container.)*

A.8. Hazardous Waste Management - Hazardous waste removed from the drums must be managed in accordance with 40 CFR 262, 264, and 265, and Chapter 62-730, F.A.C.
[Construction Permit No. 1050208- 015-AC]

A.9. Non-Hazardous Waste Restrictions - Drums containing residues that are non-hazardous waste are allowed to be incinerated only if those drums are empty containers.
[Construction Permit No. 1050208- 013-AC]

A.10. Burning Residue Restriction - No drums with burning residue on the interior or exterior may be allowed to leave the furnace's primary chamber.
[Construction Permit No. 1050208- 015-AC]

Subsection B. Emissions Unit Nos. 002 – Automated Paint Spray Booth, 006 – Lid Paint Spray Booth, 009 – Ring Dip Tank and 010 – Cleaning Solvent Usage

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

EU ID Nos.	Brief Description
002, 006, 009, 010	Collectively, these emissions units, plus the drum and lid shotblast machines, make up the drum refinishing operation. Reconditioned drums are processed in the drum shotblast machine. Any remaining residue is blasted away by steel shot. Drum lids go through a separate, but similar process in the lid shotblast machine. After shotblasting, the drum interiors and exteriors are sprayed with coatings in a Kremlin, 12' X 11.5', automated paint spray booth, EU No. 002. Once coating is complete, the drums are dried in a natural gas-fired drum drying oven with a maximum heat input rate of 1.0 MMBtu/hr. Drum lids are coated in a separate paint spray booth, EU No. 006 and are dried in a shop-built, 1.2 MMBtu/hr lid dryer that is fired with natural gas. Drum lid rings are coated in the dip tank, (EU No, 009) and are air-dried. The drum and lid shotblasting machines as well as the drum and lid drying ovens are considered insignificant emission activities (*See Appendix I*).

Essential Potential to Emit (PTE) Parameters

B.1. Methods of Operation - The paint spray booths shall not be operated unless the exhaust fans and the overspray filters are functioning properly. Replacement filters shall be similar to those stated in the application dated September 20, 1990, with an average particulate removal efficiency of 98%.
[Rule 62-210.650, F.A.C.; Construction Permit No. 1050208-013-AC]

B.2. Hours of Operation - These emissions units may operate continuously (8,760 hours/year).
[Rule 62-210.200 ("Potential to Emit"), F.A.C., Construction Permit No. 1050208-006-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.)

B.3. Visible Emissions (VE) Limitations - Visible emissions from the paint spray booth exhausts are limited to less than 20% opacity; however, in order to provide reasonable assurance that the filter systems are being properly operated, visible emissions due to paint overspray should not exceed 5% opacity. Exceedance of this limit shall not be considered a violation in and of itself, but an indication that additional overspray control precautions and/or practices may be necessary.
[Rules 62-4.070(3) and 62-296.320(4)(b)1., F.A.C.; Construction Permit No. 1050208-013-AC]

B.4. Volatile Organic Compound (VOC) Emissions Limitations - The total VOC emissions from the automated paint spray booth, lid paint spray booth, ring dip tank, and cleaning solvent usage are limited to 150 tons per consecutive 12-month period.
[Rule 62-4.160(2), F.A.C.; Construction Permit No. 1050208-013-AC]

***(Important Permitting Note**: See Specific Condition No. B.8., relating to 40 CFR 63 Subpart MMMM NESHAP requirements.)*

Recordkeeping and Reporting Requirements

B.5. VOC Content Records - Compliance with Specific Condition No. B.4., shall be determined by recordkeeping, including determination of the VOC content of each coating using EPA Method 24 or 24A, referenced in Chapter 62-297, F.A.C. The certification under EPA 450/3-84-019, if properly completed for each affected coating, may be submitted in lieu of the Method 24 or 24A tests. New coatings or the same coatings supplied by a different manufacturer shall have their VOC content determined using EPA Method 24, 24A, or the above certification prior to use in initial production. VOC content shall be determined for each coating after dilution with the maximum amount of solvent used by the permittee for production. The records shall be retained at the facility for a minimum of five years and be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050208-013-AC]

B.6. Waste VOC Content Records - A composite sample of the solvent in wastes hauled off-site shall be tested for VOC content using EPA Method 24 or 24A on a quarterly basis. The certification under EPA 450/3-84-019, if properly completed for each affected coating, may be used in lieu of the Method 24 or 24A tests. Records shall be retained at the facility for at least five years and made available to the Department upon request.
[Rules 62-4.070(3) and 62-213.440, F.A.C.; Construction Permit No. 1050208-013-AC]

B.7. Drum Refinishing Operation Records - A recordkeeping log shall be kept to document compliance with Specific Condition No. B.4. At a minimum the log shall include the following:

a. month of operation;

b. monthly total usage of each paint, thinner, and cleanup solvent, less disposal and/or reuse (in gallons);

c. VOC content (lbs/gal) of each paint, thinner, and cleanup solvent;

d. monthly total VOC emissions (lbs and/or tons) of each paint, thinner, and cleanup solvent; and

e. total facility VOC emissions for the current month and for the most recent consecutive 12-month period (lbs and/or tons/month and tons/consecutive 12-month period, respectively).

Monthly records shall be completed by the last day of the following month. The facility shall retain supporting documentation (EPA VOC data sheets, MSD sheets, purchase orders, etc.) for all coatings and solvents used. The records shall be retained at the facility for a minimum of five years and be made available to the Department upon request.

[Rules 62-4.070(3) and 62-213.440, F.A.C.; Construction Permit No. 1050208-013-AC]

Other Requirements

B.8. Federal NESHAP Requirements -The painting activities associated with drum refinishing operations of Emission Unit Nos. 002, 006, 009 and 010 are subject to the applicable provisions of 40 CFR 63, Subpart MMMM - Standards of Performance 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), F.A.C. These provisions are shown in their entirety in Appendix MMMM, which is a part of this permit. Appendix NESHAP 40 CFR 63 Subpart MMMM includes the applicable provisions of 40 CFR 63, Subpart A - General Provisions.
[Rule 62-204.800(11) and 62-213.400, F.A.C.]

B.8. *(continued)*

The following applicability references are based upon the permittee's Title V operation renewal application received January 10, 2013. Therefore, any change in operation may change the applicable provisions.

(Note - Entire section applies unless otherwise noted with specific applicable subsection references shown below the section caption.)

40 CFR 63 Subpart MMMM Applicable Provision References

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?

63.3890 What emission limits must I meet?

63.3890(b)

63.3890(c)

63.3891 What are my options for meeting the emission limits?

63.3892 What operating limits must I meet?

63.3892(a)

63.3893 What work practice standards must I meet?

63.3893(a)

63.3900 What are my general requirements for complying with this subpart?

63.3900(a)(1)

63.3900(b)

63.3901 What parts of the General Provisions apply to me?

63.3910 What notifications must I submit?

63.3920 What reports must I submit?

63.3920(a)(1)

63.3920(a)(2)

63.3920(a)(3)

63.3920(a)(4)

63.3920(a)(5)

63.3920(a)(6)

63.3930 What records must I keep?

63.3930(a)

63.3930(b)

B.8. *(continued)*

63.3930(c)(1), (c)(2) and (c)(3)

63.3930(d) through (j)

63.3931 In what form and for how long must I keep my records?

63.3940 By what date must I conduct the initial compliance demonstration?

63.3941 How do I demonstrate initial compliance with the emission limitations?

63.3942 How do I demonstrate continuous compliance with the emission limitations?

63.3950 By what date must I conduct the initial compliance demonstration?

63.3951 How do I demonstrate initial compliance with the emission limitations?

63.3952 How do I demonstrate continuous compliance with the emission limitations?

63.3980 Who implements and enforces this subpart?

63.3981 What definitions apply to this subpart?

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

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

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 - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (version 12/22/06 FR)
Appendix RR - Facility-wide Reporting Requirements
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REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Statement of Basis
Table H - Permit History
Table 1 - Summary of Air Pollutant Standards and Terms
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