Title V Air Operation Permit Renewal
Permit No. 1050208-017-AV

## APPLICANT

The applicant for this project is Industrial Container Services – Lakeland LLC. The applicant's responsible official and mailing address are: Mr. David Swanbeck, Facility Manager, Industrial Container Services – Lakeland, LLC, PO Box 2006, Auburndale, FL 33823.

## FACILITY DESCRIPTION

The applicant operates the Industrial Container Services – Lakeland LLC, which is located at 2006 Thornhill Road, Auburndale, FL.

Industrial Container Services operates a metal-drum-refinishing facility. A metal-drum-reconditioning furnace is used to remove existing paint and residual material from used drums prior to cleaning and coating. The products of incomplete combustion generated by the pyrolysis process in the primary chamber are controlled in the secondary chamber by a direct-flame afterburner fired with natural gas. The secondary chamber provides a one-second-residence time at 1450° F. Drums and lids are cleaned of remaining residue by shotblast machines. After shotblasting, the drum interiors and exteriors are sprayed with coatings in an automated paint-spray booth. Once coating is complete, the drums are dried in a natural-gas-fired drum-drying oven. Drum lids are coated in one of two paint-spray booths, and then dried in a natural-gas-fired dryer. Cleaning solvents are used throughout the facility primarily for cleaning paint-spray guns. All paint spray booths are equipped with filter systems to control overspray emissions. CAM does not apply, since there is no VOC control device associated with the painting operation.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Surface coating operations at this facility are subject to the applicable requirements of 40 CFR 63 Subpart MMMM - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Surface Coating of Miscellaneous Metal Parts and Products.

The drum reconditioning furnace and two drying ovens at this facility are not subject to 40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants (NESHAP) for 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).

## PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

## PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit No. 1050208-012-AV issued August 24, 2008
Title V Air Operation Permit Revision, Permit No. 1050208-016-AV, issued June 28, 2011
Application for a Title V Air Operation Permit Renewal received January 10, 2013
Notice of Intent to Issue Air Permit issued **[Month day, year]** *(to be completed in final permit)*
Public Notice Published **[Month day, year]** *(to be completed in final permit)*

## PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate emissions units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63. EU Nos. 002 - Automated Paint Spray Booth, 006 - Lid Paint Spray Booth, 009 - Ring Dip Tank and 010 - Cleaning Solvent Usage are subject to NESHAP 40 CFR 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the emissions units at the facility.

## PROJECT REVIEW

This renewal includes the following modifications:

Wrote the permit according to the latest Tallahassee Title V template.

Removed all references to EU No. 007 – Lid Paint Spray Booth #2 as requested by applicant. This EU is no longer operated.

Removed the designator of #1 from Lid Paint Spray Booth #1 since there is only one lid paint spray booth.

Added unrestricted hours of operation for EU Nos. 002 - Automated Paint Spray Booth, 006 - Lid Paint Spray Booth, 009 - Ring Dip Tank and 010 - Cleaning Solvent Usage. This was in Air Construction Permit 1050208-006-AC, but had been omitted from later permits.

Clarified the specifications of the overspray filters in Specific Condition No. B.1. in accordance with the permit application referenced in the specific condition.

Added several sections from 40 CFR 63, Subpart MMMM to Specific Condition B.8., relating to Compliance Requirements for the Emission Rate Without Add-On Controls Option, as requested by the applicant.

## CONCLUSION

This project renews Title V Air Operation Permit No. 1050208-012-AV, as revised by Title V Air Operation Permit No. 1050208-016-AV. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.