# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

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LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY


# FINAL PERMIT

**PERMITTEE**

Americoat Corporation
2935 Barneys Pumps Place
Lakeland, FL 33812

Authorized Representative:
Mr. S. V. Desai, President

Air Permit No. 1050210-007-AF
Permit Expires: xx/xx/xxxx
Federally Enforceable State Operation Permit (FESOP)
Project: FESOP Renewal

This is the final permit to renew Federally Enforceable State Operation Permit No. 1050210-007-AF for a burn-off oven with after burner control of emissions operation at a surface coating operation (Standard Industrial Classification No. 3479). The facility is located in Polk County at 2935 Barneys Pumps Place in Lakeland, Florida. The UTM coordinates are Zone 17, 411.37 km East, and 3096.92 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to 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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this final permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or

modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this final permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

Kelley M. Boatwright
District Air Program Administrator
Southwest District

Effective Date

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including 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 the date indicated below to the persons listed below.

Mr. S. V. Desai, Americoat Corporation (americoatusa@yahoo.com)

Erin DiBacco, SWD CAP Manager (Erin.DiBacco@dep.state.fl.us)

Clerk Stamp
**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____
(Clerk) (Date)

## FACILITY AND PROJECT DESCRIPTION

### Existing Facility

This surface coating facility operates a burn-off oven with after burner control of emissions. The burn-off oven removes old coatings (epoxies, polyesters, etc.) from steel and aluminum parts. After coating removal, the parts are either sanded, wire brushed, or abrasive blasted. The parts are then powder coated.

Facility ID No. 1050210

| EU ID No. | Emissions Unit Description |
|---|---|
| 003 | Controlled Pyrolysis, Model PRC 330, Burn-Off Oven No.11 |

***NOTE:*** *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

### Exempt Emission Sources/Activities

The emissions from the following emission sources at this facility are deemed insignificant and exempt from permitting:

- Curing and Drying ovens (except for Emission Unit No. 003: burn-off oven No. 11)
- Liquid Teflon Spray Booths (Emission Unit 001)
- Grit blast system (Emission Unit 004)
- Powder Spray Booths (Emission Units 017 through 020)

[Rule 62-4.040(1)(b), F.A.C.; Construction Permit No. 1050210-002-AC]

## FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- 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 62-213, 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 the pollutants Volatile Organic Compounds and Hazardous Air Pollutants. The emission limitations, restriction on hours of operation, restriction on the type or amount of material combusted, stored or processed in this permit will ensure that the facility's Volatile Organic Compounds and Hazardous Air Pollutants emissions will be below the threshold for a Title V source.

## PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1050210-006-AF.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

**1.** Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

**2.** Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

**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 Requirements.

**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.]

**7.** Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority. [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 this operation permit. To properly apply for an operation permit, the applicant shall submit the following:

a. 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/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

c. a copy of the most recent visible emission test report for the burn-off oven No. 11 (Specific Condition No. A.11); and

d. a copy of the most recent operating month record (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.]

## A. EU No.003 Burn-Off Oven No.11

This section of the permit addresses the following emissions unit (EU).

| EU ID No. | Emissions Unit Description |
|---|---|
| 003 | Controlled Pyrolysis, Model PRC 330, Burn-Off Oven No.11 operation procedure is as follows:<br>1. Each batch is about 6000 lbs of metal, coating thickness is about 4 Mils, and coating material is about 60 lbs.<br>2. 30 minutes to load the oven; check the water sprinkler system, door stays open.<br>3. Afterburner starts, flame is detected and oven door is closed. Afterburner runs for 45 minutes to reach $1400^0$F stack temperature.<br>4. Then the primary burner is activated automatically and it takes about 45 minutes to reach $800^0$F.<br>5. Burn-off process starts. The timer is manually set for 3 hours to ensure completion of burn-off process. If a higher amount of coating is expected, then the hours are increased.<br>6. At the end of the cycle, the oven shuts off automatically and cool down cycle begins.<br>The temperature of the after burner is factory set. The primary burner cannot start until the stack temperature reaches above $1400^0$F (design factor). There is no manual control to change this temperature. If for any reason, this does not occur, the oven automatically shuts off. The burner has a temperature indicator. Typically, the stack temperature reads $1500^0$F.<br>The oven removes the combustible materials (i.e., old coatings). The system monitors the rate of smoke emissions from the parts by measuring stack temperature. Any increase in smoke emissions raises the stack temperature. When the stack temperature reaches a preset point, the stack controller turns on water spray to cool the parts, lowering the smoke emission rate before the smoke can reach an ignition state inside the oven's cleaning chamber. The water spray system also operates if the oven temperature exceeds its set-point temperature by $30^0$F. In case of a malfunction, the oven shuts off. |

### PERFORMANCE RESTRICTIONS

**A.1.** Permitted Capacity – The maximum heat input rate is 0.80 MMBtu/hour.

*(Permitting Note - See Appendix D, Condition 1, for operation rate during testing requirements.)*

[Rule 62-210.200 (definition of Potential to Emit), F.A.C.]

**A.2.** Authorized Fuel – Burn-off oven is limited to being only fired with natural gas.
[Rule 62-4.070(3), F.A.C.; Rule 62-210.200(definition of Potential to Emit), F.A.C. and Construction Permit No. 1050210-003-AC]

**A.3.** Restricted Operation – The hours of operation are not limited (8760 hours per year
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

### EMISSIONS STANDARDS

**A.4.** Operational Limitations –

a. Burn-off oven shall be used to remove paint residue from liquid-coated and powder-coated metal parts. It shall not be used for the curing or drying of varnished or painted parts that may contain uncured paint or significant amounts of volatile solvents.

c. Burn-off oven is limited to operate a maximum 2 batches per day. A typical batch cycle is about 4.5 hours and is determined from the time a part(s) is placed in the oven and the firing of natural gas is initiated until the natural gas is shutoff. The hours are increased if higher amount coating is expected.
d. During periods when parts are being processed in the oven, the burn-off oven's afterburner shall be maintained at a minimum of $1,400^0$F.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050210-003-AC]

## COMPLIANCE TESTING REQUIREMENTS

**A.5.** Visible Emission Test Requirements – The burn-off oven's exhaust shall be tested for visible emissions on an annual basis between October 1st and September 30th (once per Federal Fiscal Year).
[Rules 62-4.070(3) and 62-297.310(7)(a)4., F.A.C.; Construction Permit Nos. 1050210-002-AC and 1050210-003-AC]

**A.6.** Visible Emission Test Condition – The burn-off oven's exhaust shall be tested for visible emissions while cleaning coatings from parts that are likely to produce the worst-case visible emissions during the cleaning process.
[Rules 62-4.070(3) and 62-297.310, F.A.C.]

**A.7.** Compliance Test Method – Required compliance tests shall be performed in accordance with the following reference method.

| Method | Description of Method and Comments |
|---|---|
| 9 | Visual Determination of the Opacity of Emissions from Stationary Sources |

The above method is described in Appendix A4 of 40 CFR 60 and is 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.
[Rule 62-204.800, F.A.C.; Appendix A4 of 40 CFR 60]

## MONITORING REQUIREMENTS

**A.8.** Monitoring Equipment Requirements – During periods when parts are being processed in the oven, the burn-off oven's afterburner temperature shall be displayed by a temperature gauge.
[Rule 62-4.070(3), F.A.C.]

## NOTIFICATION REQUIREMENTS

**A.9.** Test Notification – The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(*Permitting Note - The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

## RECORDKEEPING AND REPORTING REQUIREMENTS

**A.10.** Compliance Test Reports – The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

**A.11.** Visible Emission Test Reports – The burn-off oven's exhaust shall be tested for visible emissions while cleaning coatings from parts that are likely to produce the worst-case visible emissions during the cleaning process.
[Rules 62-4.070(3) and 62-297.310, F.A.C.]

**A.12.** Operational Data – The permittee shall In order to comply with the Specific Condition Nos. A.4.a., and A.4.b., the permittee shall keep the following records for all periods of burn-off oven operations:

a. facility ID No. (1050210) and Date (month/day/year);
b. oven Identification (i.e., Controlled pyrolysis oven, Model PRC 330); and Emission Unit Number (i.e., EU003);
c. batch cycle start time as determined when a part(s) is placed in the oven and the firing of the natural gas is initiated. Also record the afterburner temperature;
d. batch cycle end time as determined when the natural gas is shut off. Also record the afterburner temperature just before the natural gas is shut off;
e. time of each batch cycle, in hours.

[Rule 62-4.070(3), F.A.C].