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

REVISED DRAFT PERMIT

PERMITTEE

Sewell Products of Florida, LLC
909 Magnolia Avenue
Auburndale, FL 33823

Authorized Representative:
Mr. Roger Barney, General Manager

Air Permit No. 1050443-001-AC
Permit Expires: 09/30/2013
Site Name: KIK Custom Products
Minor Air Construction Permit
New HCl Solution Bottling Line

This is the final air construction permit for the construction of a new HCl Bottling Line at this existing facility. The proposed work will be conducted at the existing KIK Custom Products (Standard Industrial Classification No. 2819) located in Polk County at 909 Magnolia Avenue in Auburndale, Florida. The UTM coordinates are Zone 17, 422 km East, and 3103.82 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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.

Executed in Hillsborough County, Florida

DRAFT

_____ _____

Robert C. Wong Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

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

Mr. Roger Barney, Sewell Products of Florida, LLC
(rbarney@kikcorp.com)

Mr. Travis Gladish, KIK Custom Products
(tgladish@kikcorp.com)

Mr. Kevin Miller, P.E., U.S. Compliance Corporation
(kmiller@uscompliance.com)

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.

DRAFT

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Project Description and Proposed Emission Units

The project is the construction of a new HCl (hydrochloric acid) Bottling Line at this existing facility. HCl solution (35.2%HCl) will be unloaded from delivery trucks and/or railcars and transferred to storage tanks (3). From the storage tanks HCl solution will be transferred to dilution tanks (2) where it will be diluted to 31.45% HCl. From the dilution tanks the HCl solution will be transferred to the HCl solution bottling (container filling) operations.

Emissions from these operations will be controlled by two (2) high efficiency wet scrubbers. Emissions (vapors) from the delivery trucks and/or railcars while they are unloading and emissions (vapors) from the HCl solution storage and dilution tanks will both be controlled by a common Scrubber 1. Emissions (vapors) from the HCl bottling (container filling) operations will be controlled by Scrubber 2.

This project will create the following emissions unit (EU).

Facility ID No. 1050443

EU ID No.	Emission Unit Description
001	HCl Solution Truck/Railcar Unloading, and HCl Solution Storage and Dilution Tanks (including transfer) (w/emissions controlled by Scrubber 1)
002	HCl Solution Bottling Line Operations (w/ emissions controlled by Scrubber 2)

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- 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 hazardous air pollutants (HAPs) (specifically for the individual HAP hydrochloric acid (HCl)).

PERMIT HISTORY/AFFECTED PERMITS

This construction permit is the initial air permit for this existing facility.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (REVISED DRAFT)

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

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

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

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

3. Appendices - The following Appendices are attached as part of this permit (Section 4.):

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. *(See also Section 4. Appendix C. (Common Conditions) Condition No. 11.c. for additional AOR information.)*
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit - This permit authorizes construction of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of the new HCl Bottling Line. Commencing operation is defined as the first instance of HCl solution bottling (container filling). To apply for a Non-Title V air 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.; and

c. a statement of the scrubber operation parameter(s) and range(s) as established in accordance with Specific Condition Nos. A.2. and A.3.; and copies of the most recent month of records specified in Specific Condition Nos. A.5. and A.6.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

Facility –Wide Requirements Permitting Note – See Section 4. Appendix C. (Common Conditions) *(in the Appendices electronic document)* for Facility-Wide Requirements, in particular, the following:

- Condition No. 7 for Objectionable Odor Prohibited requirements; and
- Condition No. 8 for the facility-wide General Visible Emissions (VE) standard.

A. EU Nos. 001 (HCl Solution Unloading, and HCL Solution Storage and Dilution Tanks), and 002 (HCl Solution Bottling Line Operations)

This section of the permit addresses the following emissions units (EU):

EU ID No.	Emission Unit Description
001	HCl Solution Truck/Railcar Unloading, HCl Solution Storage and Dilution Tanks, consisting of transfer of HCl solution to storage tanks (3) and dilution tanks (2) (where the HCl solution is diluted from 36% to 31.45% HCl); and storage of HCl solution in these tanks. Vapor emissions from the HCl solution unloading operations and from the HCl solution storage and dilution tanks will both be controlled by a common high efficiency wet scrubber (Scrubber 1).
002	HCl Solution Bottling Line Operations consisting of the bottling (container filling) of HCl solution (approximately 31.45% HCl). The bottling operations are expected to have a maximum process rate of 48 gallons/minute. Vapor emissions from these operations will be controlled by a high efficiency wet scrubber (Scrubber 2).

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

SPECIFIC CONDITIONS

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity – The production rate of HCl solution bottled by the HCl Solution Bottling Line (part of EU No. 002) shall not exceed 5,000,000 gallons in any consecutive 12 month period. *(See Specific Condition No. A.5. for associated recordkeeping requirements.)*
[Rule 62-210.200(Definition of Potential to Emit), F.A.C.]

A.2. Circumvention of Control Equipment (Scrubbers 1 and 2) - The permittee shall not circumvent the air pollution control equipment (i.e., high efficiency wet scrubbers) or allow the emission of air pollutants without this equipment operating properly. In order to provide reasonable assurance of proper operation of the scrubbers, the permittee shall establish, for Scrubbers 1 and 2, an operation parameter (or parameters – e.g., scrubber flow rate, pressure drop, and/or pH) operating range that represents effective operation of the scrubbers. The operation range(s) shall be established based on manufacturers guidelines, operation of similar scrubbers on similar operations, and/or an evaluation by a Professional Engineer licensed in Florida. Scrubbers 1 and 2 shall be operated with the scrubber parameters maintained in the established range.
(See Specific Condition Nos. 8.c., A.3., A.6, and A.7. for associated scrubber parameter notification, monitoring and recordkeeping requirements.)
[Rules 62-210.650 (Circumvention), and 62-296.320(2) (Objectionable Odor Prohibited), F.A.C.]

MONITORING REQUIREMENTS

A.3. Scrubber Parameter Monitoring (Scrubbers 1 and 2) – In order to document compliance with the requirements of Specific Condition No. A.2., the permittee shall install, calibrate, operate and maintain instruments to monitor the scrubber parameters chosen to document proper operation of Scrubbers 1 and 2. The monitors shall be operated in accordance with the requirements shown below.

a. Scrubber 1 – At a minimum, a scrubber operation parameter for Scrubber 1 shall be pressure drop as measured by a differential pressure gauge. In addition, the permittee shall install and continually operate an audible alarm system connected to the differential pressure gauge for Scrubber 1 to detect variances outside of established normal operating conditions established in accordance with Specific Condition No. A.2.

In the event the monitored pressure drop prompts an alarm, response corrective actions shall be taken at the facility. During standard operational hours, the Facility Processing Operators and Facility Maintenance Staff shall suspend HCl solution bottling operations and investigate the cause of the alarm. Facility staff will complete necessary corrective actions within their capabilities; otherwise, an outside contractor would be consulted. All actions taken shall be documented and records maintained. The facility shall also assign specific response contacts, including management, for the Security and Plant Personnel to contact during non-operational hours in the case of an alarm. The personnel contacted shall coordinate a response effort to investigate the cause of the alarm and implement correction actions.

(See Specific Condition No. A.7. for associated scrubber operation recordkeeping requirements.)

b. Scrubber 2 - The permittee shall daily monitor and record the chosen scrubber operation parameter(s) (e.g., scrubber flow rate, pressure drop and/or pH) on Scrubber 2 at least once each day of operation of the HCl Bottling Line.

(See Specific Condition No. A.6. for associated scrubber parameter recordkeeping requirements.)

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

NOTIFICATION REQUIREMENTS

A.4. Notification of Commencement of Operation - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of EU No. 002, no later than fifteen (15) days after that date. Commencing operation of EU No. 002 (HCl Solution Bottling Operations) is defined as the first instance of bottling of HCl solution by the HCl Solution Bottling Line.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDKEPING REQUIREMENTS

(**Note** - See also Appendix C., Condition 10. for record retention requirements.)

A.5. HCl Bottling Line Production Records – In order to document compliance with the production limitation of Specific Condition No. A.1., the permittee shall keep records of the quantity of HCl solution bottled. At a minimum, the records shall include the following.

a. Daily Records:

1. the facility name, Facility ID Number (1050443), and EU No. (EU No. 002);
2. the date of the record; and
3. the quantity of HCl solution bottled for that day (gallons/day).

b. Monthly Records:

1. the facility name, Facility ID Number (1050443), and EU No. (EU No. 002);
2. the month and year of the record;
3. the total quantity of HCl solution bottled for that month (gallons/month); and
4. the total quantity of HCl solution bottled for the most recent consecutive 12 month period (gallons/consecutive 12 months).

The above records shall be completed no later than 5 days after the date of the record for daily records, and no later than 15 days after the month of record for monthly records.
[Rule 62-4.070(3), F.A.C.]

A.6. Scrubber Operation Parameter Daily Records for Scrubber 2 – In order to document compliance with the requirements of Specific Condition Nos. A.2. and A.3., the permittee shall keep daily records of the scrubber operation parameter(s) values established for Scrubber 2 in accordance with the requirements of Specific Condition No. A.2. At a minimum, the parameter readings for Scrubber 2 shall be taken and recorded at least once each day of operation of the HCl Bottling Line. The records shall include: the date and time; identification of the scrubber (Scrubber 2); the parameter(s) being monitored; and the value of the parameter(s) at the time of the record.
[Rule 62-4.070(3), F.A.C.]

A.7. Scrubber Operation Records for Scrubber 1 – In order to document compliance with the requirements of Specific Condition Nos. A.2. and A.3., the permittee shall keep the following operation records for Scrubber 1 for each incident where the Scrubber 1 differential pressure gauge pressure drop alarm was triggered indicating that the scrubber was operating outside the established good operation range.

a. date, time, and identification of the scrubber (Scrubber 1);

b. the value(s) of the pressure drop that triggered the alarm;

(continued)

A.7. *(continued)*

c. the steps taken to address and investigate the incident; and

d. cause of the incident and corrective actions taken to resolve the issue, including the date and time the scrubber was back in operation operating within the established good operation range.

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