FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Electronically Sent- Received Receipt Requested
bradaldrich@earthlink.net

FINAL PERMIT

PERMITTEE

Benada Aluminum Products LLC
2540 Jewett Lane
Sanford, FL 32771

Air Permit No. 1170027-011-AF
Permit Expires: May 30, 2016
Site Name: Benada Aluminum Products LLC
Project Name: Renewal

Authorized Representative: Brad Aldrich, President

This is a Federally Enforceable State Operation Permit (FESOP) Renewal Permit for the facility. Benada Aluminum Products LLC (Standard Industrial Classification No. 3354) is located in Seminole County at 2540 Jewett Lane in Sanford, Florida. The UTM coordinates are Zone 17, 471.23 km East, and 3186.40 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and 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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the

Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:
(a) The name and address of each agency affected and each agency's file or identification number, if known;
(b) The name, address, and telephone number of the petitioner; the name, address, and telephone 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 the petitioner received notice of the agency 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 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 Department'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 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department 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 Orange County, Florida

F. Thomas Lubozynski, P.E. — November 4, 2014
Waste & Air Resource Programs Administrator — 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 November 4, 2014 to the persons listed below.

Brad Aldrich, President, Benada Aluminum Products, bradaldrich@earthlink.net
James Keller, Environmental Specialist and Paint Line Manager, james.keller@benada.com
Russell Indiveri, Safety and Environmental Manager, russell.indiveri@benada.com
Jeff Rustin, P.E., FDEP – Central District, jeff.rustin@dep.state.fl.us

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk) — November 4, 2014 (Date)

FACILITY AND PROJECT DESCRIPTION

Benada Aluminum Products LLC

The facility is Benada Aluminum Products LLC. The facility has a secondary aluminum melting furnace equipped with a venturi scrubber and quenching system to control air emissions.

The existing facility consists of the following emissions unit.

Facility ID No. 1170027	
ID No.	Emission Unit Description
001	Melt Furnace with Venturi Scrubber and Quenching System

Project Description

This project is a FESOP renewal for the existing facility. The melt furnace has been shut down since May of 2011. As required by Rule 62-210.300(2)(a)3.b., F.A.C., the expiration date of this permit is approximately five (5) years from the date the emission unit (furnace) was shut down.

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 213, F.A.C.
- The facility is classified as a synthetic minor source for hazardous air pollutants (HAPs) and volatile organic compounds (VOCs).
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

This is a FESOP renewal. The previous permit projects were No. 1170027-009-AF (initial FESOP Permit) and 1170027-010-AF (Transfer of Ownership).

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District, Waste & Air Resource Programs. The Central District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Central District Office
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767
   Telephone: 407-897-4100

   All documents related to applications for permits shall be submitted to the above address or electronically to the following address: DEP_CD@dep.state.fl.us. In each document, clearly identify the Air Permit Project No. 1170027-011-AF.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Compliance Assurance Program. (Use the above mailing or e-mail address.) In each document, clearly identify the Air Permit Project No. 1170027-011-AF and specific emission unit.

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;
   d. Appendix D. Common Testing Conditions;
   e. Appendix E. 40 CFR 63, Subpart A, General Provisions;
   e. Appendix F. NSPS - 40 CFR 63, Subpart RRR; and
   f. Appendix G. Operation, Maintenance, and Monitoring Plan

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: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports (AORs) must be submitted even when the emission unit has not operated. The AOR shall be submitted electronically to the Compliance Authority by April 1st of each year. Go to the following website for the latest information about electronic submittal of AORs: http://www.dep.state.fl.us/air/emission/eaor/default.htm

   [Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application: A completed application for a renewal operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of this air 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.; and
   c. copies of the most recent two months of records/logs specified in Specific Condition No. **A.20.**

   [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. 001 – Melting Furnace with Venturi Scrubber and Quenching System

This section of the permit addresses the following emission unit.

ID No.	Emission Unit Description
001	Melt Furnace with Venturi Scrubber and Quenching System

EQUIPMENT

A.1. Equipment Name: The permittee may operate a secondary aluminum melting furnace equipped with a venturi scrubber and quenching system to control air emissions. The control systems will quench the hot exhaust air from the aluminum remelt furnace and abate particulate and hydrochloric acid (HCl) emissions. A capture efficiency of 90 percent is expected.

The facility includes the following emissions sources and activities. According to the previous permit, the following meet the exemption criteria listed in Rule 62-210.300(3)(a), F.A.C., Rule 62-210.300(3)(a)34., F.A.C., or Rule 62-210.300(3)(b)1.c., F.A.C.:

a. Aging Oven #1,
b. Aging Oven #2,
c. Aging Oven #3,
d. Billet Furnace #1,
e. Billet Furnace #2,
f. Billet Furnace #3,
g. Powder Coat Spray Room,
h. Stripping Oven #1,
i. Stripping Oven #2,
j. Powder Curing Oven #2,
k. Homogenizing Oven,
l. Dry-Off Oven,
m. Infra-Red Heating Oven,
n. Methyl Ethyl Ketone (MEK) usage,
o. Gas-Fired Water Heater for Aluminum Cleaning Operations, and
p. Cut-Off Saws.

{Permitter's Note: This facility uses under 20 gallons per year of Methyl Ethyl Ketone (MEK). Most of this solvent is used as a quality assurance measure to test the paint adhesion properties. With a density of 0.800 g/ml, this corresponds to a usage and emission rate of approximately 134 pounds per year.}

PERFORMANCE RESTRICTIONS

A.2. Restricted Operation: The hours of operation are not limited (8,760 hours per year) [Rule 62-210.200(PTE), F.A.C.]

A.3. Permitted Capacity: The maximum operation rate shall not exceed 25,550 tons of aluminum processed per consecutive 12 months. [Rule 62-210.200(PTE), F.A.C., and construction permit application received March 4, 2003]

A.4. Authorized Fuel and Permitted Capacity: The emission unit may only burn natural gas or propane with a maximum heat input of 219,000 MMBTU per consecutive 12 months. [Rule 62-210.200(PTE), F.A.C., and construction permit application received March 4, 2003]

A.5. Unconfined Emissions of Particulate Matter (PM) - In addition to the conditions in Appendix C., Condition 9, the following reasonable precautions shall be followed:

a. Paved parking and trafficked areas shall be maintained and kept free of particulate matter build-up.

b. Sprinkling with water shall be used as necessary on paved areas, unpaved areas, stockpiles, and during loading/unloading operations.

If operating experience indicates that these reasonable precautions are not sufficient to control unconfined PM emissions, the Department reserves the right to require additional measures. [Rules 62-4.070(3), 62-210.300(3)(c)2.e., and 62-296.320(4)(c), F.A.C.

A.6. VOC Emissions: Pursuant to Rule 62-296.320(1)(a), F.A.C., the following procedures shall be used to minimize emissions:

a. Maintain tightly fitting cover, lids, etc. on all containers of VOCs when they are not being handled, used, etc.;

b. All equipment, fittings, valve lines, pipes, drums, tanks, etc. shall be properly operated and maintained;

c. Prevent excessive air turbulence across exposed VOCs; and

d. All VOC spills shall be attended to immediately and waste properly disposed, recycled, etc.

[Rule 62-296.320(1), F.A.C.]

EMISSIONS LIMITS

A.7. The facility is subject to the requirements of 40 CFR 63 Subpart A – General Provisions and the applicable requirements (requirements that apply to a minor source) of 40 CFR 63, Subpart RRR – Secondary Aluminum Production.
[40 CFR 63 Subpart A – General Provisions and 40 CFR 63 Subpart RRR – Secondary Aluminum Production]

A.8. Visible Emissions Limitation: Visible emissions from the facility are limited to less than 20 percent opacity.
[Rule 62-296.320(4)(b)1., F.A.C.]

A.9. Emission Limits: Emissions from the secondary aluminum melting furnace shall not exceed 0.00021 grains of D/F TEQ (toxicity equivalent for dioxins and furans) per ton of aluminum processed. [Rule 62-210.200(PTE), F.A.C. and 40 CFR 63.1505(i)(3)]

A.10. VOC and HAP Emission Limits: The maximum facility-wide VOC and HAP emissions are limited as follows:

Pollutant	Emission Limits (tons per any consecutive 12 month period
Total Volatile Organic Compounds (VOCs)	Less than 10.0
Total Hazardous Air Pollutants (HAPs)	Less than 25.0
Individual Hazardous Air Pollutant (HAP)	Less than 10.0

[Rules 62-4.070(3) and 62-210.200(247), Potential to Emit, F.A.C.]

TESTING REQUIREMENTS

A.11. Compliance Tests: No later than 30 days after being placed back into operation (after the current long term shutdown), the emissions unit (EU 001) shall be tested to demonstrate compliance with the emissions standards for visible emissions, dioxins, and furans.
[Rules 62-297.310(7)(a)4.a., 62-297.310(7)(a)3., and 62-4.070(3), F.A.C.]

A.12. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), the emissions unit (EU 001) shall be tested to demonstrate compliance with the emissions standards for dioxins and furans.
[Rule 62-297.310(7)(a)4.c., F.A.C.]

A.13. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.14 Additional PM Testing Requirements: Stack sampling facilities must comply with the Rule 62-297.310(6), F.A.C.

A.15. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Methods	Description of Method and Comments
EPA Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources
EPA Method 23	Determination of Polychlorinated Dibenzo-p-Dioxins and Polychlorinated Dibenzofurans from Stationary Sources.

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.401, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

A.16. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the Melting Furnace, EU No. 001, no later than five (5) days after that date. Commencing operation means setting any emissions unit into operation for any purpose.
[Rules 62-4.070 and 62-210.200(91), Commence Operation, F.A.C.]

A.17. Test Notification: The permittee shall notify the Compliance Authority at least 15 days prior to the compliance test for the melt furnace (EU 001). 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.
[40 CFR 60, Subpart A, 60.8(d) and Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

MONITORING REQUIREMENTS

A.18. The pH value of the scrubber recirculation water and venturi pressure drop of the scrubber shall be measured and recorded in the monthly log no less than once a month. The pH value of the scrubber recirculation water shall be no less than 7.5 and the pressure drop shall be no less than 10.0 inches, water column, at any time during the operation of the scrubber. These values are based on the operation, maintenance and monitoring plan; and previous stack test data.
[Rule 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

A.19. Compliance Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit, that is, "The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed."
[Rule 62-297.310(8), F.A.C.]

A.20. Monthly Log: In addition to the recordkeeping and reporting requirements of 40 CFR 63, Subpart RRR, a monthly log shall be kept to demonstrate compliance with Specific Condition No. **A.3.**, **A.4.**, and **A.10.** The permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall be made available to the Department upon request. The log shall contain the following:

a. Facility Name, Facility ID No. (i.e., 1170027);

b. Month and year of record;

c. Quantify the most recent consecutive 12-month total aluminum operating rate;

d. Quantify the most recent consecutive 12-month heat input to the aluminum melting furnace;

e. Most recent consecutive 12-month total of VOC emissions, total HAP emissions, and each HAP emission;

f. One month total of VOC emissions, total HAP emissions, and each HAP emission;

g. No less than one reading each month of the pH value of the scrubber recirculation water; and

h. No less than one reading each month of the venturi pressure drop (inches, water column) of the scrubber.

Monthly logs shall be completed by the end of the tenth of the following month.

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data is available until such a time as a consecutive 12-month total can be maintained each month. [Rule 62-4.070(3), F.A.C.]

A.21. Additional Recordkeeping Requirements: Records specified in Specific Condition No. **A.20.** (previous condition) must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those to used to derive emissions, must be clearly documented, and may be presented in the form of a template of sample calculations. The documents must be available for review on site by the Department. [Rule 62-4.070(3), F.A.C.]

A.22. Supporting Documentation: Supporting documentation (e.g., chemical usage tracking logs, "As Supplied" sheets, Safety Data Sheets, EPA data sheets, purchase orders, waste shipment/disposal records, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions for a minimum of five (5) years. The records shall be made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]

A.23. Record Retention: The records required in Specific Condition No. **A.20.** shall be recorded in a permanent form suitable for inspection and made available to the Department upon request. The records shall be maintained onsite for a minimum of five (5) years. [Rule 62-4.070(3), F.A.C.]

A.24. Additional Reporting: The emission unit is subject to additional reporting requirements contained in the attached Appendix F – Operation, Maintenance, and Monitoring Plan. The facility must follow this plan. [Rule 62-4.070(3), F.A.C.]