Florida Department of Environmental Protection

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

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Secretary

FINAL PERMIT

PERMITTEE

Metal Industries, Inc.
P.O. Box 4490
Clearwater, FL 33758-4490

Authorized Representative:
Mr. Jay Poppleton, Treasurer/Assistant Secretary

Air Permit No. 1190007-007-AF
Permit Expires: 08/10/2017
Site Name : Metal Industries, Inc. - Bushnell
Minor Federally Enforceable State Operation Permit (FESOP) Renewal
Project Name: Operation Permit Renewal

This is the final permit to renew Air Operation Permit No. 1190007-005-AF and to remove EU 014 - Clean Oven (incinerator) as a regulated emission unit for a facility that manufactures aluminum and steel air distribution products at Metal Industries, Inc. – Bushnell (Standard Industrial Classification No. 3446). The facility is located in Sumter County at 400 West Walker Avenue in Bushnell, Florida. The UTM coordinates are Zone 17, 390.74 km East, and 3173.20 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

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.

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

_____ _____

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.

Howard Loy, Director of Chemical and Environmental Engineering
Metal Industries, Inc

Jay Poppleton, Treasurer/Assistant Secretary
Metal Industries, Inc.

Danielle Henry, Southwest District Air Program Compliance Manager
Florida Department of Environmental Protection

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 facility manufactures aluminum and steel air distribution products (grilles, registers, etc.). The existing facility consists of the following emissions units.

Facility ID No. 1190007	
ID No.	Emission Unit Description
014	Clean Oven (incinerator)
016	Paint Line No. 1
017	Paint Line No. 2

Project Description and Affected Emission Unit

This project renews Operation Permit No. 1190007-005-AF and changes EU 014 – Clean Oven (incinerator) from a regulated emission unit to an exempt emission unit. This project will delete the following emission unit.

Facility ID No. 1190007	
ID No.	Emission Unit Description
014	Clean Oven (incinerator)

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

Exempt Emission Units/Activities

One 26.8 HP propane fired emergency generator. This generator was installed in January 1987. It is expected to operate less than 400 hours per year.
[Rule 62-210.300(3)(a)35., F.A.C.]

The following propane or natural gas combustion sources are exempt per Rule 62-210.300 (3)(a)(34), F.A.C.:

One cleaning oven that is used to remove paint residue from the racking hardware. The oven is fired only on propane or natural gas at a maximum heat input rate of 0.8 MMBtu/hour (0.4 MMBtu/hour for the primary chamber + 0.4 MMBtu/hour for the afterburner, secondary chamber). All VOC and HAP emissions from the paint residue are considered accounted for in Emission Unit Nos. 016 and 017;

(Permitting Note: This oven was previously regulated as Emission Unit 014.)

Pre-Treatment Tank No. 3 (cleaner) w/heater with a maximum heat input rate of 3.5 MMBtu/hour associated with EU No. 016;

Pre-Treatment Tank No. 5 (conversion coating) w/heater with a maximum heat input rate of 3.5 MMBtu/hour associated with EU No. 016;

Dry-Off Oven with a maximum heat input rate of 2.0 MMBtu/hour associated with EU No. 016;

Dehydration Oven with a maximum heat input rate of 2.5 MMBtu/hour associated with EU No. 016;

Bake Oven with a maximum heat input rate of 6.0 MMBtu/hour associated with EU No. 016;

ED Evaporator with a maximum heat input rate of 1.2 MMBtu/hour associated with EU No. 016;

Pre-treatment washer tank w/heaterwith a maximum heat input rate of 1.5 MMBtu/hour associated with EU No. 017;

Dry-Off Oven with a maximum heat input rate of 3.5 MMBtu/hour associated with EU No. 017.; and

Bake Oven with a maximum heat input rate of 4.5 MMBtu/hour associated with EU No. 017.

Brazing, soldering, or welding activities.
[Rule 62-210.300(3)(a), F.A.C.]

Sanding equipment.
[Rules 62-210.300(3)(a), F.A.C.]

Fire and safety equipment.
[Rule 62-210.300(3)(a), F.A.C.]

Portable gasoline and diesel powered equipment.
[Rule 62-210.300(3)(b), F.A.C.]

Propane and gasoline powered forklifts.
[Rule 62-210.300(3)(b), F.A.C.]

Laboratory equipment and testing activities.
[Rule 62-210.300(3)(a), F.A.C.]

Steam cleaning activities.
[Rule 62-210.300(3)(a), F.A.C.]

Space heating.
[Rule 62-210.300(3)(a), F.A.C.]

Industrial wastewater treatment activities.
[Rule 62-210.300(3)(b), F.A.C.]

Adhesive activities.
[Rule 62-210.300(3)(b), F.A.C.]

Plastic wrapping and heat sealing activities.
[Rule 62-210.300(3)(b), F.A.C.]

Propane hot water heaters.
[Rule 62-210.300(3)(a), F.A.C.]

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 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 pollutant volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

Modifies Permit No. 1190006-006-AC and renews Permit No. 1190007-005-AF.

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

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:

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 the 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 month of records/logs specified in Specific Condition No. A.7.

[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 Nos. 016 and 017 – Paint Line Nos. 1 and 2

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
016	This emissions unit is a continuous painting conveyor line used to paint/coat aluminum and steel air distribution products. The products are processed by passing through pre-treatment tanks, a dry-off oven, 3 electrodeposition vats, rinse tanks, a dehydration oven, 3 touch-up paint spray booths, and a bake oven prior to packaging/shipping. The process emission sources consist of the following: Facility ID — Propane or Natural Gas Combustion Sources* — Max. Heat Input Rate (MMBtu/hour) #7 — Pre-Treatment Tank No. 3 (cleaner) w/heater — 3.5 #8 — Pre-Treatment Tank No. 5 (conversion coating) w/heater — 3.5 #5 — Dry-Off Oven — 2.0 #1 — Dehydration Oven — 2.5 #9 — Bake Oven — 6.0 #18 — ED Evaporator — 1.2 * Exempt emission sources Facility ID — Coating/Paint Sources #3 — 3 Electrodeposition Vats (uncontrolled) #2 — 3 Paint Touch-Up Booths, DeVilbiss Model XWE-6371 rated at 17,000 ACFM or equivalent, each controlled by a fabric filter.
017	This emissions unit is a paint spray line used to paint/coat aluminum and steel air distribution products. The products are processed by passing through a pre-treatment washer with heater, rinse tanks, dry-off oven, spray booth, and a bake oven prior to packaging/shipping. The process emission sources consist of the following: Facility ID — Propane or Natural Gas Combustion Sources* — Max. Heat Input Rate (MMBtu/hour) #10 — Pre-treatment washer tank w/heater — 1.5 #11 — Dry-Off Oven — 3.5 #13 — Bake Oven — 4.5 * Exempt emission sources Facility ID — Coating/Paint Sources #12 — Paint Spray Booth, DeVilbiss Model XWE-6371, rated at 17,500 ACFM or equivalent, and controlled by a fabric filter.

A. EU Nos. 016 and 017 – Paint Line Nos. 1 and 2

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 ("Potential to Emit"), F.A.C.]

EMISSIONS STANDARDS

A.2. Volatile Organic Compound (VOC) Emission Limitations - VOC emissions attributed to the paints/coatings, thinners, and cleanup solvents shall not exceed the following:

Emission Unit No.	VOC (tons/any consecutive 12-month period)
016	84.95
017	11.90

[Construction Permit No. 1190007-006-AC]

A.3. Hazardous Air Pollutant (HAP) Emission Limitations –HAP emissions from both emission units combined shall not exceed the following:

Emission Unit Nos.	Individual HAP (tons/any consecutive 12-month period)	Total HAPs (tons/any consecutive 12-month period)
016 and 017 combined	9.0	22.5

[Construction Permit No. 1190007-006-AC]

A.4. Visible Emission (VE) Limitations - Visible emissions from the paint spray booths are limited to <20% opacity, however, in order to provide reasonable assurance that the fabric filters are being properly operated, visible emissions due to paint overspray should not exceed 5 percent opacity. Exceedance of the 5% limit shall not be considered a violation in and of itself, but an indicator that additional control precautions and/or practices may be necessary.
[Rules 62-296.320(4)(b)1., F.A.C.; Construction Permit No. 1190007-006-AC]

A.5. Unconfined Particulate Emission Precautions - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter at this facility. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing, and handling. Reasonable precautions to be taken at this facility shall include, but not be limited to, the use of fabric filters to control paint spray booth overspray emissions.
[Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 1190007-006-AC]

RECORDS AND REPORTS

A.6. Recordkeeping Requirements - A monthly log for these emission units shall be kept to document compliance with the limitations of Specific Condition Nos. A.3. and A.4. The log shall be retained at the facility for a minimum of three years. At a minimum, the log shall indicate the following:

For each emissions unit separately:

a. facility name, facility ID No., emission unit ID No., and description (e.g., Metal Industries, Inc., 1190007, EU 016, Paint Line #1);

b. date (month and year);

c. identity and quantity of each paint, coating, thinner, and cleanup solvent used;

d. operation (electrodeposition vat, paint spray booth, or cleanup);

e. monthly usage of each VOC and HAP containing material (gallons/month);

f. VOC and/or HAP content (lbs/gallon) of each item in Specific Condition No. A.6.e., above;

g. total VOC emissions (tons/month) based on Specific Condition Nos. A.6. e. and f.;

h. cumulative total VOC emissions for the most recent consecutive 12-month period (tons/ consecutive 12-month period) based on Specific Condition No. A.6.g.;

For both emissions units combined:

i. total HAP emissions (tons/month) based on Specific Condition Nos. A.6. e. and f.;

j. cumulative total HAP emissions for the most recent consecutive 12-month period (tons/ consecutive 12-month period) based on Specific Condition No. A.6.i.;

k. if the most recent consecutive 12-month period of total HAP emissions exceed 8 tons, calculate for that current month the monthly HAP emissions for each individual HAP, in tons per month (based upon material HAP content); and

l. if the most recent consecutive 12-month period of total HAP emissions exceed 8 tons, calculate the cumulative total of the HAP emissions for each individual HAP in tons for that most recent consecutive 12-month period.

Supporting documentation ("As Supplied", "As Applied" sheets, MSD sheets, purchase orders, etc.) shall be kept for each paint and solvent as indicated in the log, which includes sufficient information to determine VOC and HAP emissions. Documentation of the solvent used for cleanup shall use a mass balance to determine usage (amount used for cleanup minus amount collected for disposal or recycle). The monthly logs shall be completed by the end of the following month. These records shall kept at the facility for at least 3 years and be made available to the Department upon request. [Rules 62-4.070(3), F.A.C.; Construction Permit No. 1190007-006-AC]