Florida Department of Environmental Protection

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DRAFT PERMITS

PERMITTEE

Outokumpu Stainless Pipe, Inc.
241 West Clarke Street
Wildwood, FL 34785-3001

Authorized Representative:
Mr. Domenick DiGiallonardo, Vice President
Technology

Air Permit Nos. 1190046-006-AC
1190046-005-AO
Permits Expire: 03/31/2013 (AC)
xx/xx/20xx (AO)
Site Name: Outokumpu Stainless Pipe, Inc.

Minor Air Construction and Operation Permits
Project Name: Replace Furnace Burners and Operation Permit Renewal

These are the final air construction and operation permits, in one document. Construction Permit 1190046-006-AC is for the after-the-fact replacement of the burners in the three annealing furnaces (EU 001). Operation Permit 1190046-005-AO is to renew Air Operation Permit No. 1190046-004-AO for a facility that manufactures stainless steel pipe (Standard Industrial Classification No. 3317). The facility is located in Sumter County at 241 West Clarke Street in Wildwood, Florida. The UTM coordinates are Zone 17, 398.71 km East, and 3194.56 km North. As noted in the Final Determination provided with these final permits, no changes or only minor changes and clarifications were made to the draft permits.

This final document 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, this document contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this document.

These air pollution permits are 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 these permits. 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 these final permits, 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

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Kelley M. Boatwright 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 Permits 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 to the persons listed below.

Mr. Domenick DiGiallonardo, Vice President Technology
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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

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(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility manufactures stainless steel pipe. The existing facility consists of the following emissions units (EUs).

Facility ID No. 1190046	
EU ID No.	Emission Unit Description
001	Group of Propane Fired Furnaces
002	Outside Wet Sand Blasting Area

Project Description and Affected Emission Unit

This project is for the after-the-fact replacement of the burners in each of the three furnaces (EU 001). Each burner was replaced with low-NOX burners. Two of the furnaces (F-2 and F-3) have a slight increase in heat input based on their maximum capacity from 11.5 to 12.0 MMBtu/hr for furnace F2, and from 10.6 to 11.0 MMBtu/hr for furnace F3. This permit also changes the blasting material used in EU 002 and adds a new Plasma Cutting System to the list of exempt emission activities. This project will modify the following emissions unit.

Facility ID No. 1190046	
EU ID No.	Emission Unit Description
001	Group of Natural Gas Fired Furnaces
002	Outside Wet Abrasive Blasting Area

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

Exempt Emission Units/Activities

The following are exempt by Rule 62-210.300(3)(a)33., F.A.C. - Fossil Fuel Hot Water Heaters:

Water heater fired with only natural gas at a maximum heat input rate of 400,000 BTU/hr.;

Water heater fired with only natural gas at a maximum heat input rate of 500,000 BTU/hr.;

Water heater fired with only natural gas at a maximum heat input rate of 600,000 BTU/hr.

The following are exempt by Rule 62-210.300(3)(b)1., F.A.C. - Generic Emissions Unit or Activity Exemption:

Hydrofluoric acid storage tank;

Nitric acid storage tank;

Three (3) pickling tanks;

Two (2) 10,000 gallon silos for the temporary storage of pickling liquid when the three (3) pickling tanks are being repaired and/or maintained;

Four (4) Ink Printers that may use Methyl Ethyl Ketone base ink (approximately 43 gallons/yr.) and associated solvents for pipe labeling and stenciling operations;

Inside Diameter Pipe Steel Grit Blasting Operation to blast/clean the inside of pipes. (During the recycling of the recovered grit, the filtering of the airflow with a baghouse is considered an integral part of the operation.);

Outside Diameter Pipe Steel Grit Blasting Operation to blast/clean the outside of pipes. (During the recycling of the recovered grit, the filtering of the airflow with a baghouse is considered an integral part of the operation.);

Elevated abrasive blasting media storage hopper/bin used in conjunction with the Outside Wet Abrasive Blasting Area. (The hopper/bin receives abrasive blasting media pneumatically by truck and the uncontrolled displaced air vents to the atmosphere. The amount of abrasive blasting media transferred is limited by a federally enforceable limitation associated with Emission Unit No. 002 – Outside Wet Abrasive Blasting Area that limits the maximum amount of abrasive blasting media to 3,553 tons/yr.); and

Plasma Cutting System in the North Building. The plasma cutter is used to cut patterns out of sheets of stainless steel. Air is drawn down into the cutting table and exhausted through a HEPA filter system.

A mobile air compressor powered by a Cummins diesel engine, Model N14. The horsepower can vary from 310 to 525 HP depending on the air demand and the throttle setting used during operation. This activity is exempt in accordance with the provisions of Rule 62-210.300(3)(a)35., F.A.C. – Stationary Reciprocating Internal Combustion Engines.

Lime storage silo. (Based on the uncontrolled particulate matter emissions from pneumatically transferring a maximum of four (4) truck shipments a year. Lime is used for the on-site waste water treatment plant. Therefore, the number of truck shipments of lime in a reasonable and practical matter is considered to be a maximum of four (4) lime truck shipments a year.)
This activity is exempt in accordance with the provisions of Rule 62-4.040(1)(b), F.A.C. – Exemptions: Insignificant Impact.

Exemptions under Rule 62-4.040(1)(b), F.A.C., may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

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 natural minor source of air pollution.

PERMIT HISTORY/AFFECTED PERMITS

These permits modify and replace Construction Permit No. 1190046-003-AC and replace Operation Permit No. 1190046-004-AO.

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority – Beginning January 1, 2013, the permitting authority for this project is the Florida Department of Environmental Protection (Department), Central District's Air Resource Management Section. The mailing address and phone number is:

Florida Department of Environmental Protection
Central District Office
Air Resource Management Section
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 applicable address.

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

3. Appendices - The following Appendices are attached as part of this document:

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. 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 renewal, 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

d. copies of the most recent month of records/logs specified in Specific Condition Nos. A.5. and B.5.

[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.]

FACILITY-WIDE SPECIFIC CONDITIONS

8. Unconfined Emissions of Particulate Matter - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. 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 shall include the following:

a. Application of water with a water applicator trailer to paved and unpaved areas accommodating vehicular traffic, as necessary.

b. Maintain a five (5) mile per hour (MPH) speed limit on roadways.

c. Enclosure or covering of activities or equipment where necessary.

d. The outside sandblasting area shall use partitions and/or curtains, as necessary, to minimize unconfined particulate matter emissions from leaving the property grounds. The area shall also have at a minimum four (4) 20 foot high tall wind screens.

e. Any collected particulate shall be wetted and properly removed in a manner so that it will not become airborne.

f. During the truck loading of lime into the lime storage silo the displaced air shall be vented through a pipe that discharges below the water level of a water barrel.

[Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 1190046-006-AC]

9. Visible Emissions Indicator Standard - As an indicator that the precautions to control unconfined particulate matter emissions are adequate, visible emissions (VE) at the facility's property line should not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself,

but may be a violation of the precautions stated above and serve as justification to the Department to require additional controls or work practices.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1190046-006-AC]

A. EU 001 - Group of Three Furnaces

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

EU ID No.	Emission Unit Description
001	This emission unit consists of a group of three furnaces used to anneal stainless steel pipe. Each furnace is described below: Roller Hearth Furnace (F-1) designated as Emission Point No. 1: This GASMACO, Model No. MUTA-PCA-84, furnace is located inside the South Building and is fired with only natural gas at a maximum design heat input rate of 8.0 MMBtu/hr. The furnace has a low-NOx gas fired burner roller hearth unit comprised of a preheat chamber using recuperated combustion air, two (2) heating zones, and two (2) water spray quench chambers at the exit end for heat treatment. Spray headers with nozzles are positioned above and below the roller conveyor. Approximately 1.015 tons/hour and 8,887 tons/year of pipe are annealed in the furnace. At the outlet of the furnace there is a hood which directs steam from a water quench and fugitive emissions leaving the furnace to a stack that vents above the South Building roof. Car-Bottom Furnace (F-2) designated as Emission Point No. 2: This ARMCO furnace is located outside the North Building under an open air roof shelter and fired with only natural gas at a maximum design heat input rate (of the multiple low-NOx burners) of 12.0 MMBtu/hour. Pipe is placed on a car-bottom and rolled into the furnace. As the car-bottom goes in place, the integral furnace door is closed. When the pipe is annealed, the furnace is opened and the pipe is removed. The pipe is processed (annealed) in the furnace in batches of approximately 1.028 tons/hr. and 9,005 tons/yr. Emissions from the furnace are fugitively emitted to the atmosphere. Rotary Roller Furnace (F-3) designated as Emission Point No. 3: This Surface Combustion, Model No. 84-PCA, Serial No. CC-10570-1, furnace is located inside the North Building and fired with only natural gas at a maximum design heat input rate of 11.0 MMBtu/hour. The furnace has direct fired low-NOx burners. It is a heated, skewed hourglass type roller hearth annealing furnace consisting of a charge table, two (2) heat zones, a water quench chamber, and a discharge table. The equipment is designed to automatically traverse pipe, in a single file through the annealing zone and provides immediate water quenching. The quenching is achieved by using spray headers with nozzles positioned around the roller conveyed pipe. Approximately 1.015 tons/hour and 8,887 tons/year of pipe are annealed in the furnace. Emissions from the furnace are fugitively emitted to the atmosphere through building openings (i.e., windows and doors).

A. EU 001 - Group of Three Furnaces

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation of this emissions unit are not limited (i.e., permitted for 8760 hours per year).
[Rules 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1190046-006-AC]

A.2. Authorized Fuel - Each furnace shall be fired with natural gas only.
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1190046-006-AC]

A.3. Permitted Capacity – The total combined natural gas usage for the three (3) furnaces shall not exceed 255,996,120 cubic feet per any consecutive 12-month period.
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1190046-006-AC]

MONITORING REQUIREMENTS

A.4. Natural Gas Monitoring – A natural gas meter(s) shall be used to determine natural gas usage in cubic feet.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1190046-006-AC]

RECORDS AND REPORTS

A.5. Recordkeeping Requirements - In order to document compliance with Specific Condition Nos. A.2. – A.4., the permittee shall record the following monthly for the group of three furnaces:

a. facility name, Facility ID No. (1190046), Emission Unit ID No. (EU 001);

b. date, in month and year;

c. type of fuel used (natural gas);

d. amount of natural gas used, in cubic feet; and

e. total amount of natural gas used for the most recent consecutive 12-month period, in cubic feet.

The monthly records shall be completed by the end of the following month and retained at the facility for at least three (3) years. The records shall be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1190046-006-AC]

B. EU 002 - Abrasive Blasting

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

EU ID No.	Emission Unit Description
002	After a pipe is processed an annealing scale from oxidation is formed on the pipe. In order to remove the scale the pipe is transferred to an outside wet abrasive blasting area in the southwest part of the facility. The blasting operation is conducted on a pad, bounded on four sides by a 20-foot tall windscreen with a ceiling of windscreen to minimize unconfined emissions of particulate matter. The blasting media is primarily Staurolite, but similar hard garnet-like media can also be used. It is pneumatically conveyed by 80 psig air pressure through one of two water-fed halo nozzles. A maximum of two (2) wet blasting media nozzles are used at any one time. The abrasive/air/water stream abrades the oxidized surface of the pipes. The blasting media is pneumatically conveyed to the two (2) nozzles from an (exempt from permitting) abrasive blasting media storage hopper/bin at a maximum usage rate of 3,553 tons per any consecutive 12-month period.

PERFORMANCE RESTRICTIONS

B.1. Restricted Operation - The hours of operation of this emissions unit are not limited (i.e., permitted for 8760 hours per year).
[Rules 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1190046-006-AC]

B.2. Nozzle Usage – A maximum of two wet abrasive blasting media nozzles shall be used at any one time.
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1190046-006-AC]

B.3. Nozzle Requirements - Only abrasive blasting media nozzles with an integral water halo shall be used.
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1190046-006-AC]

B.4. Permitted Capacity – A maximum of 3,553 tons of abrasive blasting media shall be used per any consecutive 12-month period. Abrasive blasting media usage shall be based on the amount of blasting media transferred to the elevated blasting media storage hopper/bin.
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1190046-006-AC]

RECORDS AND REPORTS

B.5. Monthly Records - In order to document compliance with Specific Condition No. B.4., the permittee shall record the following monthly:

a. facility name, Facility ID No. (1190046), Emission Unit ID No. (EU 002);

b. amount of abrasive blasting media transferred by truck to the elevated blasting media storage hopper/bin, in tons; and

c. total amount of abrasive blasting media transferred by truck to the elevated blasting media storage hopper/bin for the most recent consecutive 12-month period, in tons.

The monthly records shall be completed by the end of the following month and retained at the facility for at least three years. The records shall be made available to the Department upon request. [Rule 62-4.070(3), F.A.C.; Construction Permit No. 1190046-006-AC]