TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

Facility ID No. 1190046

PROJECT

Project No. 1190046-006-AC
Application for Minor Air Construction Permit
Project Name: Replace Furnace Burners

COUNTY

Sumter, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

December 14, 2012

Prepared by Nancy E. Knight

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Facility Description:

This facility manufactures stainless steel pipe.

II. Project Description:

A. Applicant:
Mr. Domenick DiGiallonardo, Vice President Technical
Outokumpu Stainless Pipe, Inc.
241 West Clarke Street
Wildwood, FL 34785-3001

B. Professional Engineer:
Mr. Jerzy Z. Hubert, P.E.
Diversified Engineering International, Inc.
5378 Riverview Dr.
St. Augustine, FL 32080

C. Project Location:

241 West Clarke Street, Wildwood, Sumter County

D. Project Summary:

Replace the existing burners with low-NOX burners in three (3) annealing furnaces at an existing stainless steel pipe manufacturing plant as further described in the permit.

E. Application Information:

Operation Permit Renewal Application Received on: October 29, 2012
Additional Information Requested on: November 9, 2012
Construction Permit Application Received on: December 11, 2012
Additional Information Received on: December 11, 2012
Application Complete: December 28, 2012

III. Applicable State and Federal Regulations

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source, and project is not PSD major itself
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	facility is a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOC and Odor)	Y	facility is a source of VOC and odors
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Sumter County is not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	there is no applicable source category
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	N	there is no applicable source category

Subject to:	Y/N	Comments
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a natural minor non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	testing is not required. Compliance is demonstrated via recordkeeping.

IV. Summary of Emissions

Allowable Emissions

Visible Emissions (VE): EUs 001 and 002 - <20% opacity

Potential Emissions

Pollutant	EU No. and brief description	Existing Potential Emissions (TPY)	Change in Potential Emissions (TPY)	Potential Emissions after Project (TPY)
PM	001- Furnace F-1	0.26	--	0.26
	001– Furnace F-2	0.37	0.02	0.39
	001– Furnace F-3	0.34	0.02	0.36
	002 – Outside Blasting	21.70	--	21.70
	Facility Total	**22.67**	**0.04**	**22.71**
PM10	001- Furnace F-1	0.26	--	0.26
	001– Furnace F-2	0.37	0.02	0.39
	001– Furnace F-3	0.34	0.02	0.36
	002 – Outside Blasting	3.29	--	3.29
	Facility Total	**4.26**	**0.04**	**4.30**
VOC	001 – Furnace, F-1	0.19	--	0.19
	001 – Furnace, F-2	0.27	0.02	0.29
	001 – Furnace, F-3	0.25	0.01	0.26
	Facility Total	**0.71**	**0.03**	**0.74**
NOx	001 – Furnace, F-1	3.40	-1.67	1.73
	001 – Furnace, F-2	4.89	-2.30	2.59
	001 – Furnace, F-3	4.51	-2.13	2.38
	Facility Total	**12.80**	**-6.10**	**6.70**
SO2	001 – Furnace, F-1	0.02	-0.01	0.01
	001 – Furnace, F-2	0.03	-0.01	0.02
	001 – Furnace, F-3	0.03	-0.01	0.02
	Facility Total	**0.08**	**-0.03**	**0.05**

Pollutant	EU No. and brief description	Existing Potential Emissions (TPY)	Change in Potential Emissions (TPY)	Potential Emissions after Project (TPY)
CO	001 – Furnace, F-1	2.86	0.05	2.91
	001 – Furnace, F-2	4.11	0.25	4.36
	001 – Furnace, F-3	3.79	0.21	4.00
	Facility Total	**10.76**	**0.51**	**11.27**

Furnace emissions are based on operating 8,760 hours per year, the maximum design heat input rate of each furnace and AP-42 Table 1.4-2 emission factors.

Outside blasting PM/PM_{10} emissions are based on operating 2 nozzles 8,760 hours per year using 600 lbs/hour of abrasive blasting media, and AP 42 Section 13.2.6 Table 4-4.

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).