Title V Air Operation Permit Renewal
Permit No. 0250407-014-AV

APPLICANT

The applicant for this project is the Exteria Building Products, LLC. facility. The applicant's responsible official and mailing address are: Stefan Schwarz, Sr. VP of Engineering, Exteria Building Products, LLC. facility, 1111 NW 165 Street, Miami, FL 33169.

FACILITY DESCRIPTION

The applicant operates the Exteria Building Products, LLC facility, which is located at 1111 NW 165 Street, Miami, FL 33169.

This facility consists of the following emissions units:

EU No.	Brief Description
001	Coating Line No.1 consists of three (3) spray booths, and a gas-fired curing oven Captured emissions from this emissions unit are routed to an RTO
004	Coating Line No. 2 consists of three (3) continuous paint spray booths, two (2) touch-up spray booths, and an electric curing oven Captured emissions from this emissions unit are routed to an RTO

Exteria Building Products, LLC. operations consist of the manufacturing and coating of polypropylene siding used for architectural and construction applications. The plastic siding is manufactured, coated, and packaged at the facility for shipping offsite. The coating operations consist of two spray painting coating lines. Line No. 1 coats plastic shingles molded from polypropylene pellets. Line No. 1 consists of three coating paint spray booths (one of which being state-of-the art), and a gas-fired curing oven. The coatings used are solvent-based color coatings. Line No. 2 also coats plastic shingles molded from polypropylene pellets. Line No. 2 consists of three continuous spray booths, two touch-up spray booths, and an electric convection-curing oven. Both paint lines are connected to an air pollution control system consisting of a Regenerative Thermal Oxidizer (Model No. RETOX 27.0 RTO95).

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V Air Operation Permit, and incorporate the terms and conditions of concurrently processed Air Construction Permit No. 0250407-015-AC for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received March 12, 2013.
Application for an Air Construction Permit received November 27, 2013.

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a source of air pollution for Prevention of Significant Deterioration (PSD) in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to Emissions Units 001 and 004. The facility currently has a CAM Plan in its Title V Permit, and this CAM Plan will be incorporated into this Title V Renewal project.

PROJECT REVIEW

Specific changes were made to the previous Title V Air Operation Permit No. 0250407-013-AV, and are in this PROPOSED Title V Air Operational Permit Renewal. Such changes include FDEP reformatting of the entire permit document, replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, etc. For example, some of the recordkeeping, and testing requirements that were previously listed under TV-6, (i.e. administrative permit corrections, deviation reports, etc.) and the Facility-Wide Conditions, and Specific Conditions under the previous Title V permit (i.e. certification by responsible official, testing, submittal of monitoring reports, statement of compliance, etc.) are now listed under the new Appendix RR – Facility-Wide Reporting Requirements, and Appendix TR – Facility-Wide Testing Requirements.

Additionally, recent organizational changes have occurred within the Miami-Dade County Government and the Department of Environmental Resources Management (DERM) was merged with two (2) other departments. The consolidated name is now the Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management. As a result, all references to DERM in the permit have been changed to RER. Other DERM references were changed to FDEP or Administrator.

Items numbered 1 – 8 below represent the changes to the previous Title V Air Operation Permit. Underline text indicates additions. ~~Strikethrough indicates text removed~~.

1. Changes in Section III – Subsection A, Emissions Units and Specific Conditions, Emissions Units 001 and 004 – Coating Line Nos. 1 and 2. This Subsection addresses the Common Conditions and has been removed. With the FDEP reformatting of the entire permit document, the following specific conditions that were listed in the permit under Subsection A are now listed either under the Facility-wide Conditions, Applicable Regulations, new Appendix TR – Facility-Wide Testing Requirements, new Appendix RR – Facility-Wide Reporting Requirements, new Appendix TV – Title V General Conditions or removed as follows:

From: Subsection A – Common Conditions	To: Applicable Section
A.1	Applicable Regulations (page No. 2 of 43)
A.2 – A.8	Appendix TR
A.9	Removed
A.10	Appendix TV
A.11	Appendix RR
A.12	Facility-Wide Conditions

2. Changes in Section III – Subsection B, Emissions Units and Specific Conditions, Emissions Units 001 and 004 – Coating Line Nos. 1 and 2. With the removal of Subsection A, all Specific Conditions that were listed under Subsection B in the previous permit are now listed under Subsection A. There is no Subsection B in the permit renewal. In addition, the incorporation of Air Construction Permit No. 0250407-015-AC required that the following Specific Conditions be modified as follows:

A.2. Permitted Capacity: The maximum amount of coating applied shall not exceed a combined usage of 460,000 gallons for both lines during any consecutive 12-month period.
[Rules 62-212.400(2)(g), 62-204.800(10)(d)2, and 62-210.200(PTE), F.A.C.; Air Construction Permit No. 0250407-015-AC]

A.4. Volatile Organic Compounds:

a) For the facility, the maximum amount of VOC contained in all coatings, thinners and/or other additives, and cleaning materials used in the coating operation shall not exceed 1,495 tons per consecutive 12-month period.
b) For the facility, emissions of VOC after control from all materials including coatings, thinners and/or additives, and cleaning materials shall not exceed 249 tons during any consecutive 12-months and shall not exceed 30 tons during any single month.
c) For the purposes of this permit, all emissions limits include emissions during startup, shutdown and malfunction and are not subject to the provisions of Rule 62-210.700(1) F.A.C.

[Rule 62-212.400(2)(g), 62-210.700(1), 62-210.700(6), F.A.C. and Permit No. 0250407-015-AC]

A.5. Control Technology Requirements: The Permittee shall operate a Regenerative Thermal Oxidizer for the control of VOC/HAPs.

a) EU-001 and EU-004 shall only operate while appropriately connected to the Regenerative Thermal Oxidizer (RTO) so that emissions are controlled.
b) The RTO shall operate with at least 97 percent destruction efficiency.
c) Capture efficiency of Emissions Unit 001 shall be no less than 90 percent.
d) Capture efficiency of Emissions Unit 004 shall be no less than 86 percent.

[Rule 62-212.400(2)(g), 62-210.200 (PTE), F.A.C.; Case-by Case MACT and Permit No. 0250407-015-AC]

3. Changes in Section III – Subsection B, Emissions Units and Specific Conditions, Emissions Units 001 and 004 – Coating Line Nos. 1 and 2. With the FDEP reformatting of the entire permit document, the following specific condition that was listed in the permit have been removed since it is now listed under the new Appendix RR – Facility-Wide Reporting Requirements as follows:

4. Changes in Section III – Subsection B, Emissions Units and Specific Conditions, Emissions Units 001 and 004 – Coating Line Nos. 1 and 2. With the FDEP reformatting of the entire permit document, the following specific condition that was listed in the permit have been removed since it is now listed under the new Appendix TR – Facility-Wide Testing Requirements as follows:

5. Changes in Section III – Subsection B, Emissions Unit and Specific Conditions, Emissions Units 001 and 004 – Coating Line Nos. 1 and 2. To keep with the FDEP reformatting of the entire permit document, the following specific condition addressing CAM applicability has been added:

A.15. CAM Plan: These emissions unit(s) are subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

6. Changes in Section III – Subsection A, Emissions Unit and Specific Conditions, Emissions Units 001 and 004 – Coating Line Nos. 1 and 2. To keep with the FDEP reformatting of the entire permit document, the following specific conditions addressing other testing and reporting requirements have been added:

A.39. Other Testing Requirements: See Appendix TR, Facility-Wide Testing Requirements, for additional reporting requirements.

A.48. Other Reporting Requirements: See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

7. The addition and removal of some specific conditions required that subsequent specific conditions be renumbered accordingly. Rule citations for some specific conditions have been updated. In addition, some minor typographical errors have been corrected.

8. The incorporation of Air Construction Permit No. 0250407-015-AC required that all Specific Conditions include this air construction permit No. as part of the rule citation.

CONCLUSION

This project renews Title V air operation permit No. 0250407-013-AV, which was issued on October 24, 2008. In addition, it incorporates the terms and conditions of concurrently processed Air Construction Permit No. 0250407-015-AC. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.