M E M O R A N D U M

DATE: September 7, 2011

TO: Richard D. Garrity, Ph.D.

FROM: Lora Webb **THRU:** Diana M. Lee, P.E.
Sterlin Woodard, P.E.

SUBJECT: **Renewal Operating Permit – L.V. Thompson, Inc.**
Permit No. 0571301-003-AO

Attached is Renewal Operating Permit No. 0571301-003-AO for L.V. Thompson, Inc., a metal coil coating facility. The facility operates a single line coating operation. Metal coils are placed on one of two uncoilers and the uncoiled metal is passed through a wash tank to clean the metal. From there, the metal passes through a rinse tank, through a pretreater tank, and through a dryer. From the dryer, the metal goes into a coating room where two coaters are used to coat both sides of the metal. The coating room is enclosed and kept under negative pressure. There is no limitation on the types of coatings that can be used provided that the annual usage of coatings does not exceed 120,000 gallons/year and the maximum VOC emissions from the facility do not exceed 37.2 tons/year.

The metal, once it is coated, passes through a two-stage oven, which cures the paint, and then through a quench tank. The coated metal is then re-coiled and stored or shipped offsite. The materials used in the wash tank, rinse tank, and pretreatment tank do not contain VOCs or HAPs, therefore, they are exempt from permitting.

Volatile Organic Compound (VOC) emissions from the coating room and the finish oven are vented to a Gasway Corporation Fume Incinerator equipped with a heat exchanger and a direct recuperation system. The finish oven and incinerator are fired by propane at a maximum heat input rate of 7.2 MMBtu/hr. and 7 MMBtu/hr., respectively. Combustion air for the incinerator is drawn from the coating room. VOC emissions from the incinerator stack and quench exhaust stack are exhausted directly to the atmosphere.

The facility is subject to the 2.6 lb/gal of coating VOC RACT limit (Rule 62-296.502, F.A.C. - Coil Coating), and the 0.14 kg/l of coating solids NSPS limit (40 CFR 60.462, Subpart TT - Metal Coil

Surface Coating). The facility is a synthetic minor source of volatile organic compounds (VOC) and hazardous air pollutants (HAP). Propane, which is used to fuel the oven and incinerator, is stored in a 30,000 gallon horizontal storage tank. The storage tank is exempt from permitting pursuant to 40 CFR 60.110b(d)2.

As part of the requirements of the operating permit, the facility has to conduct a capture efficiency test, which is performed once every five years prior to renewal and a destruction efficiency test, which is done on an annual basis. The most current tests were conducted in May 2011 and resulted in a CE of 90.8% and a DE of 98.5%. The Compliance Section reviewed both tests on July 12, 2011 and determined that they both demonstrated compliance with the permit.

In July 2007, a Warning Notice was issued for failure to maintain tightly fitting covers on the acetone drums and for failure to keep the access doors to the coating room closed and sealed during operation. This Warning Notice was closed without any Enforcement action. In addition, in July 2010, a Warning Notice was issued for failure meet the destruction efficiency minimum requirement of 90% during the annual destruction efficiency test performed on May 25, 2010. This Warning Notice resulted in Enforcement Case No. 10-0525NM1301. The facility retested the incinerator for destruction efficiency in August 2010 and passed the test with a 98.7% destruction efficiency. The Enforcement Case was closed in March 2011. No other complaints about the facility or warning notices have been issued in the past five year.

Based on our review, we recommend approval of the above referenced permit as drafted.

LAW: 0571301-003-AO

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

L.V. Thompson
President
L.V. Thompson, Inc.
5015 E Hillsborough Ave.
Tampa, FL 33610
_____/

File No.: 0571301-003-AO
County: Hillsborough

Enclosed is Permit Number 0571301-003-AO to operate a single line metal coil coating facility, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

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, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of receipt of this permit. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (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 F.A.C.

A petition that disputes the material facts on which the EPC's action is based is required to contain the following information:

(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 and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;

(c) A statement of how and when the petitioner received notice of the EPC action;

(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 EPC's proposed action;

(f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC'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 EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC'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 EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant

supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY

_____
Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

cc: Florida Department of Environmental Protection – via email
Cory Houchin, P.E. – Environmental Sciences Group, Inc.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

PERMITTEE:
L.V. Thompson, Inc.
5015 E. Hillsborough Avenue
Tampa, FL 33610

PERMIT/CERTIFICATION
Permit No.: 0571301-003-AO
County: Hillsborough
Expiration Date: September 7, 2016
Project: Metal Coil Coating

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

This permit authorizes the operation of a metal coil coating facility. The coating line is a single coat operation, which operates two coaters. The operation starts with the uncoiling of the metal. Metal coils are placed on one of two uncoilers and the uncoiled metal is passed through a wash tank where spray nozzles spray a cleaner onto the top and bottom of the coil to clean both sides. From there, the metal passes through a rinse tank which rinses the metal. The rinse tank uses water and a pH toner to adjust the pH of the water as needed. The metal is then passed through a pre-treatment tank which contains water. From the pretreatment tank, the coil is passed through an electricity-powered dryer to dry the metal. The metal then goes into a coating room where it is coated using two coaters, which coat the top and bottom of the metal. There is no limitation on the types of coatings that can be used provided that the annual usage of coatings does not exceed 120,000 gallons/year and the maximum VOC emissions from the facility do not exceed 37.2 tons/year. The coating room is enclosed and kept under negative pressure. Volatile Organic Compound (VOC) emissions from the coating room are vented to an incinerator which is described below.

The metal then passes through a two-stage oven which cures the paint. The oven is completely enclosed and VOC emissions from the oven are vented to the incinerator. The metal coil is then passed through a quench tank, which sprays the metal with water that has been circulated through a cooling tower. The coated metal is then recoiled and stored or shipped offsite. The materials used in the wash tank, rinse tank, and pretreatment tank do not contain VOCs or HAPs, therefore, the materials are exempt from permitting.

VOC emissions from the coating room and the finish oven are vented to a Gasway Corporation Fume Incinerator equipped with a heat exchanger and a direct recuperation system. An interlock circuit is used to ensure that the coating line will not operate if the incinerator is not in operation. The finish oven and

incinerator are fired by propane at a maximum heat input rate of 7.2 MMBtu/hr. and 7 MMBtu/hr., respectively. The combustion air for the incinerator is drawn from the coating room. VOC emissions from the incinerator stack and quench exhaust stack are exhausted directly to the atmosphere.

Propane, which is used to fuel the oven and incinerator, is stored in a 30,000 gallon horizontal storage tank. The storage tank is exempt from permitting pursuant to 40 CFR 60.110b(d)2.

Location: 802 North 45th Street, Tampa, Fl Hillsborough County

UTM: 17-361.615 E 3092.192 N NEDS NO: 1301

Emission Unit No. 001 - Metal Coil Coating Line with Fume Incinerator

References Permit No.: 0571301-001-AC

Replaces Permit No.: 0571301-002-AO

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

3. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

4. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

5. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

6. As requested by the permittee, in order to establish the facility as a synthetic minor for both criteria and Hazardous Air Pollutants (HAP), the following emission limitations shall apply: [Rules 62-4.070(3), 62-210.200, and 62-296.502, F.A.C., 40 CFR 60 Subpart TT, and Permit No. 0571301-001-AC]

A) The maximum facility wide VOC emissions shall not exceed 37.2 tons per any 12 consecutive month period.
B) The HAP, as defined in Rule 62-213.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP, and 25 tons in any 12 consecutive month period for any combination of HAPs.

7. The permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.6 pounds per gallon of coating (0.31 kilograms per liter), excluding water, delivered to a coating applicator from prime and top-coat or single-coat operations. [Rule 62-296.502(2), F.A.C. and Permit No. 0571301-001-AC]

8. The emission limit of Specific Condition No. 7 shall be achieved by oxidizing at least 90% of the volatile organic compounds (VOC measured as a total combustible carbon) which enters the incinerator to carbon dioxide and water. [Rule 62-296.502(3)(b), F.A.C. and Permit No. 0571301-001-AC]

9. The permittee shall not cause to be discharged into the atmosphere more than: [40 CFR 60.462(a)(2) and (3) and Permit No. 0571301-001-AC]

SPECIFIC CONDITIONS:

A) 0.14 kg VOC/liter of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or
B) 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency.

10. In order to ensure compliance with Specific Condition Nos. 6, 7, 8, and 9, the following restrictions and limitations shall apply: [Rule 62-4.070(3), F.A.C. and Permit No. 0571301-001-AC]

A) The maximum coating usage shall not exceed 24.0 gallons in any hour and 120,000 gallons in any 12 consecutive month period.
B) The material usage of coating(s) shall not result in the facility emitting more than 37.2 tons of VOC emissions per twelve consecutive month period.
C) No more than 133.4 lbs./hr. of VOC shall be charged to the incinerator.
D) The oven and the incinerator shall be fired on propane exclusively.
E) The maximum combined heat input rate of the oven and incinerator shall not exceed 14.2 MMBtu/hr.
F) Hours of operation of the coil coating line are not restricted.
G) The minimum capture efficiency of the system shall be 90% of the VOC usage rate of the coil coating line.
H) The incinerator shall be maintained at a minimum instantaneous temperature of 1350° F while the coil coating line is operating.
I) The permittee shall install and maintain a device which continuously monitors and records the temperature in the incinerator.
J) The permittee shall maintain the interlock which will not allow the operation of the coil coating process line when the incinerator is not in operation.
K) Only non-VOC material is authorized to be used for cleanup or as a coating thinner.
L) Maintain and monitor negative pressure in the coater head room enclosure during routine operation of the coil coating process line.
M) Keep the access door to the coater head room enclosure closed and sealed during operation of the coil coating process line.
N) The fan used to evacuate VOC emissions from the system shall maintain a minimum of 7200 ACFM total gas flow to the incinerator.

11. At all times, the variable speed control of the quench stack exhaust fan shall be set at the level it was set at during the latest successful compliance demonstration. [Rule 62-4.070(3), F.A.C.]

12. The permittee shall ensure that the interlock circuit is functioning properly at all times when the source is in operation and shall operate and maintain the emission control device as per the manufacturer's guidelines and the best operating practice. [Rule 62-4.070(3), F.A.C.]

SPECIFIC CONDITIONS:

13. The permittee shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with Specific Condition No. 8. This device shall have an accuracy of ±2.5 °C or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. [40 CFR 60.464(c) and Rule 62-4.070(3), F.A.C. and Permit No. 0571301-001-AC]

14. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable control device operating properly. Operation of the coating line shall not occur unless the fume incinerator is operating properly. [Rule 62-210.650, F.A.C.]

15. Compliance with the destruction efficiency requirement of Specific Condition No. 8 shall be determined by the VOC destructive test method annually, once per federal fiscal year (October 1 – September 30) with a target date of June 26. Compliance with the capture efficiency requirement of Specific Condition No. 10.G) shall be determined by the VOC Nondestructive test method prior to renewal of this permit. The minimum requirements for stack sampling facilities, source sampling, and reporting shall be in accordance with Rule 62-297.310, F.A.C. and 40 CFR 60, Appendix A. [Rule 62-296.502(4), F.A.C., 40 CFR 60.8(a) and 60.466, and Permit No. 0571301-001-AC]

A) Destructive: The test method for volatile organic compounds shall be EPA Methods 1, 2, 3, 4, and 25. The EPA Method 25 test shall be conducted simultaneously on the inlet and outlet of the incinerator. Attachment 3 of EPA-450/2-78-041, incorporated and adopted by reference in Rule 62-297.440, F.A.C., may be used in place of EPA Method 25.

   i. EPA Method 25, both for measuring the VOC concentration in each gas stream entering and leaving the fume incinerator and for measuring the VOC concentration in each gas stream emitted directly to the atmosphere.
   ii. For EPA Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Environmental Protection Commission of Hillsborough County.
   iii. EPA Method 1 for sample and velocity traverses.
   iv. EPA Method 2 for velocity and volumetric flow rate.
   v. EPA Method 3 for gas analysis.
   vi. EPA Method 4 for stack gas moisture.
   vii. Negative pressure shall be maintained and monitored in the coater head room enclosure during the capture efficiency test.

B) Nondestructive: The capture efficiency test shall be performed in accordance with Rule 62-297.440(7), F.A.C. - EPA VOC Capture Efficiency Test Procedures,

   i. The sampling time for each capture efficiency test run shall be at least 8 hours, unless

otherwise approved by the Environmental Protection Commission of Hillsborough County pursuant to Rule 62-297.620, F.A.C.

ii. Capture efficiency shall be determined concurrently with the VOC destructive test.

iii. Negative pressure shall be maintained and monitored in the coater head room enclosure during the capture efficiency test.

C) VOC Content of Coating: EPA Method 24 shall be used for determining the VOC content of the coating as applied to the surface of the metal coil.

i. When the VOC content of waterborne coatings, determined by EPA Method 24, is used to determine compliance, the results of the EPA Method 24 analysis shall be adjusted as described in Section 12.6 of EPA Method 24.

ii. For EPA Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

16. The permittee shall include the following data with the annual compliance test report required by 40 CFR 60.8: [40 CFR 60.465(a) and (b) and Permit No. 0571301-001-AC]

A) The combustion temperature of the fume incinerator used to attain compliance with Specific Condition Nos. 8 and 9.

B) The weighted average of the VOC content of coatings used during the period of one calendar month.

C) The overall VOC destruction rate used to attain compliance with Specific Condition Nos. 8 and 9.

17. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of maximum permitted coating usage rate of 24.0 gallons/hour. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates, including a copy of the continuous temperature recording for the incinerator during the test period, and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

18. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9, F.A.C.]

19. The permittee shall submit two copies of the test data for each formal compliance test conducted pursuant to Specific Condition No. 15 to the Air Compliance Section of the Environmental Protection

SPECIFIC CONDITIONS:

Commission of Hillsborough County within forty-five days of such testing. Test reports shall be consistent with the requirements of 40 CFR 60 and Rule 62-297, F.A.C. [Rule 62-297.310(8), F.A.C.]

20. In addition to the testing requirements specified in Specific Condition No. 15. above, the permittee shall conduct a performance test for each calendar month according to the following procedures. Each monthly calculation is a performance test. [40 CFR 60.463 and Permit No. 0571301-001-AC]

A) The permittee shall use the following procedures to determine the monthly volume-weighted average emissions of VOC's in kg/liter of coating solids applied: [40 CFR 60.463(c)]

i. Determine the overall reduction efficiency (R) for the capture system and control device. The permittee may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedures in A)i.1., A)i.2., and C) below shall be repeated when directed by the Environmental Protection Commission of Hillsborough County or when the permittee elects to operate the control device or capture system at conditions different from the initial performance test. [40 CFR 60.463(c)(2)(i)]

1. Determine the fraction (F) of total VOC's emitted by the facility that enters the control device using the following equation (Equation 5): [40 CFR 60.463(c)(2)(i)(A)]

Where:

l is the number of gas streams entering the control device,
p is the number of gas streams emitted directly to the atmosphere,
F is the fraction of the total VOC's emitted by the facility that enters the control device,
C_b is the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon), and
Q_b is the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour).

2. Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation (Equation 6): [40 CFR 60.463(c)(2)(i)(B)]

Where:

E is the VOC destruction efficiency of the control device (fraction)
n is the number of gas streams entering the control device,
m is the number of gas streams leaving the control device and entering the atmosphere,
Q_b is the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour)
C_b is the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon),
Q_a is the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour), and
C_a is the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon).

B) The permittee shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in Specific Condition No. 15. The permittee shall construct a temporary enclosure around the flashoff area (finish oven and quench area) during the performance test for the purpose of evaluating the capture efficiency of the system. Prior to the performance test, the permittee shall demonstrate to the Environmental Protection Commission of Hillsborough County that the coater head room enclosure is adequately containing VOC emissions. If not, an additional enclosure will be required for the performance test. The temporary enclosure along with the coater head room enclosure must be maintained at and monitored for negative pressure to ensure that all VOC emissions are measurable. [40 CFR 60.463(c)(2)(i)(B)]

C) Determine overall reduction efficiency (*R*) using the following equation (Equation 7): [40 CFR 60.463(c)(2)(i)(C)]

$$R = EF$$

Where:

R is the overall VOC emission reduction achieved by the facility (fraction),
E is the VOC destruction efficiency of the control device (fraction), and
F is the proportion of the total VOC's emitted by the facility that enters the control device (fraction)

D) If the overall reduction efficiency (R) is equal to or greater than 0.90, the facility is in

SPECIFIC CONDITIONS:

compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as follows. [40 CFR 60.463(c)(2)(i)(C)]

i. Calculate the volume-weighted average of the total mass of VOCs per unit volume of coating solids applied (G) during each calendar month for the facility using the following equations as specified in D)i.1., D)i.2., and D)i.3. below. [40 CFR 60.463(c)(2)(ii)]

1. Calculate the mass of VOCs used (M_o+M_d) during each calendar month for the facility by the following equation (Equation 1): [40 CFR 60.463(c)(2)(ii) and 40 CFR 60.463(c)(1)(i)(A)]

Note: will be 0 if no VOC solvent is added to the coatings, as received

Where:

n is the number of different coatings used during the calendar month,
m is the number of different VOC solvents added to coatings used during the calendar month,
M_o is the mass of VOC's in coatings consumed, as received (kilograms),
M_d is the mass of VOC-solvent added to coatings (kilograms),
L_c is the volume of each coating consumed, as received (liters),
D_c is the density of each coating, as received (kilograms per liter),
W_o is the proportion of VOC's in each coating, as received (fraction by weight),
L_d is the volume of each VOC-solvent added to coatings (liters), and
D_d is the density of each VOC-solvent added to coatings (kilograms per liter).

2. Calculate the total volume of coating solids used (L_s) in each calendar month for the facility by the following equation (Equation 2): [40 CFR 60.463(c)(2)(ii) and 40 CFR 60.46(c)(1)(i)(B)]

Where:

n is the number of different coatings used during the calendar month,
L_s is the volume of coating solids consumed (liters),
V_s is the proportion of solids in each coating, as received (fraction by volume), and
L_c is the volume of each coating consumed, as received (liters).

SPECIFIC CONDITIONS:

3. Calculate the volume-weighted average mass of VOCs used per unit volume of coating solids applied (G) during the calendar month for the facility by the following equation (Equation 3): [40 CFR 60.463(c)(2)(ii) and 40 CFR 60.46(c)(1)(i)(C)]

Where:

G is the volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of coating solids applied (kilograms per liter),
M_o is the mass of VOC's in coatings consumed, as received (kilograms),
M_d is the mass of VOC-solvent added to coatings (kilograms), and
L_s is the volume of coating solids consumed (liters).

E) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation (Equation 8): [40 CFR 60.463(c)(2)(iii)]

$$N = G(1-R)$$

Where:

N is the volume-weighted average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter)
G is the volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of coating solids applied (kilograms per liter), and
R is the overall VOC emission reduction achieved by the facility (fraction).

F) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/liter of coating solids applied, the facility is in compliance. Each monthly calculation is a performance test. [40 CFR 60.463(c)(2)(iv)]

21. Where compliance with the numerical limit specified in Specific Condition No. 9.A) is achieved through the use of higher VOC-content coatings in conjunction with the fume incinerator, the permittee shall compute and record the average VOC content of coatings applied during each calendar month, according to the equations provided in Specific Condition No. 20. [40 CFR 60.464(a) and Permit No. 0571301-001-AC]

22. In order to demonstrate compliance with Specific Condition Nos. 6, 7, 10, and 21 the permittee shall maintain daily and monthly records of operations for the most recent 24 month period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request. The records shall include, but not be limited to, the following: [Rules 62-

SPECIFIC CONDITIONS:

296.500(2)(b)1. and 62-4.070(3), F.A.C., 40 CFR 60.465, and Permit No. 0571301-001-AC]

A) Daily

i) Date
ii) Coil coating process; substrate: Aluminum/Steel
iii) VOC content as applied (lbs./gal.)
iv) Total volume of coatings used (gallons)
v) Hours of coil coating operation
vi) Gallons of coating per hour of operation
vii) Continuous fume incinerator combustion temperatures

B) Monthly

i) Date
ii) Total VOC and HAP emissions for the month. The VOC emissions and individual HAP content of each material shall be recorded on the same form.
iii) Total volume of coatings used (gallons)
iv) Average VOC content of coatings applied
v) Propane usage

C) Rolling Twelve Consecutive Months

i) Rolling twelve month total of VOC and HAP emissions. The VOC emissions and individual HAP content of each material shall be recorded on the same form.
ii) Rolling twelve month total of volume of coatings used (gallons)

23. The permittee shall maintain at the source, for a period of at least 3 years, records of all data and calculations used to determine monthly VOC emissions and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain at the source daily records of the incinerator combustion temperature. [40 CFR 60.465(e) and Rule 62-4.160(14), F.A.C.]

24. The permittee shall identify, record, and submit a written report to the Environmental Protection Commission of Hillsborough County every calendar quarter of each instance in which the volume-weighted average of the local mass of VOCs emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Specific Condition No. 9.A). If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Environmental Protection Commission of Hillsborough County semiannually. [40 CFR 60.465(c)]

25. The permittee shall record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the fume incinerator remains more than 28 °C (50 °F) below

SPECIFIC CONDITIONS:

the temperature at which compliance with Specific Condition No. 9 was demonstrated during the most recent measurement of incinerator efficiency required by 40 CFR 60.8. The records shall identify each such occurrence and its duration. The records shall include the temperatures obtained by the device that continuously records the combustion temperature of the fume incinerator. The temperature records shall be maintained at the facility for a period of at least two years and shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request. [40 CFR 60.464(c) and Rule 62-4.070(3), F.A.C.]

26. The permittee shall submit reports at the following frequency and as specified in 40 CFR 60.7(c) when the incinerator temperature drops as defined under Specific Condition No. 25. If no such periods occur, the permittee shall state this in the report. [40 CFR 60.465(d), 40 CFR 60.7(c), and Permit No. 0571301-001-AC]

A) Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report and-or summary report form (see 40 CFR 60.7(d)) to the EPC semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or the EPC, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period. Written reports of excess emissions shall include the following information:

   i. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.
   ii. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.
   iii. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
   iv. When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

27. The pollution control equipment (incinerator and associated ductwork) shall be maintained in good repair to perform adequately the function for which it was intended. Maintenance shall include, but is not limited to, bi-weekly inspections and replacement or repair of faulty equipment when necessary or as required by the manufacturer. Any maintenance/repair performed shall be recorded. Records shall be maintained for the most recent 12 month period and made available for inspection upon request. [Rule 62-4.070(3), F.A.C.]

SPECIFIC CONDITIONS:

28. The permittee shall not store, handle, process, or use in any process the Volatile Organic Compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320, F.A.C.]

A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
C) Immediately attend to all spills/waste as appropriate.

29. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(199), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment.
B) Installation or addition of any equipment which is a source of air pollution.
C) Increase in coating usage beyond the limitations stated in this permits.

30. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(2), F.A.C.]

31. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

32. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

SPECIFIC CONDITIONS:

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director