TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Wolverine Advanced Materials
10825 County Rd. 44
Lisbon, FL 34788

Wolverine Advanced Materials

Facility ID No. 0690008

PROJECT

Project No. 0690008-008-AV
Application for Title V Air Operation Permit Renewal and Revision
Project Name: Title V Air Operation Permit Renewal and Revision

COUNTY

Lake County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

April 3, 8, 24, and 25, 2012

Prepared by Jeffrey Rustin, P.E.

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. <u>Project Description:</u>

A. Applicant:

Mr. Terry Ray, Plant Manager
Wolverine Advanced Materials
10825 County Road 44
Lisbon, FL 34788

B. Professional Engineer:

Mr. Kennard Kosky, P.E.
Golder Associates Inc.
6026 NW 1st Place
Gainesville, FL 32607

C. Project Location:

Wolverine Advanced Materials
10825 County Road 44
Lisbon, FL 34788

D. Project Summary:

The purpose of this permit is to renew and revise the existing Title V air operation permit 0690008-007-AV. Wolverine Advanced Materials proposes to increase the permitted utilization rates of the coil coater. The coil coater is currently limited to the following operations: maximum tons of coating 2880 tons/year; maximum tons of primer 199 tons/year; maximum tons of sulfur solution 233 tons per year; and maximum tons of accelerator 54 tons per year.

The maximum projected rates are as follows:

Maximum tons of coating: 4600 tons/year
Maximum tons of primer: 318 tons/year
Maximum tons of sulfur solution: 372 tons/year
Maximum tons of accelerator: 86 tons/year

Draft Construction Permit 0690008-009-AC and Draft Title V Air Operation Permit 0690008-008-AV incorporates the proposed maximum projected rates. EU 002–Hylene Draying and EU 003-Hylene coating have been permanently shut down and the equipment has been removed from the facility. The emergency fire pump has been designated as emission unit 006.

E. Application Information:

Application Received on: 12/02/11
Additional Information Requested on: 1/26/12
Additional Information Received on: 1/31/12
Application Complete: 1/31/12

II. Rule Applicability

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 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Facility could be a source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	A source of VOC and odors.
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)	Y	40 CFR 60 Subpart A and Subpart IIII apply to the emergency fire pump generator.
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)	Y	40 CFR 63 Subpart A and SSSS apply to the coil coater. 40 CFR 63 A and ZZZZ apply to the emergency fire pump generator.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	Facility is considered to be a Title V source and a major source of HAPs.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy, opacity)
VOC	EU 001 Coil Coater	42.59*	**42.59***
	Emergency Diesel Engine (100 hrs.)	0.02	
	Total	42.61	
PM	EU 001 Coil Coater	0.19	
	Emergency Diesel Engine (100 hrs.)	0.02	
	Total	0.21	
NOx	EU 001 Coil Coater	2.53	
	Emergency Diesel Engine (100 hrs.)	0.29	
	Total	2.82	
SO2	EU 001 Coil Coater	0.02	
	Emergency Diesel Engine (100 hrs.)	0.02	

	Total	0.04	
CO	EU 001 Coil Coater	2.12	
	Emergency Diesel Engine (100 hrs.)	0.06	
	Total	2.18	

* based on 98.8 percent destruction efficiency by the RTO.

V. Federal NSPS and/or NESHAP Provisions

40 CFR 60, Subpart A-General Provisions
40 CFR 60, Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR 63, Subpart A-General Provisions
40 CFR 63, Subpart SSSS- National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil
40 CFR 63, Subpart ZZZZ-National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

VI. 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, Central District Office, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767, 407-893-3334.

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 for the aforementioned air pollution sources in accordance with the draft permit and its conditions as stipulated (see attached).