Florida Department of
Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronically Sent- Received Receipt Requested

DRAFT PERMIT

PERMITTEE

Townley Engineering and Manufacturing Co., Inc.
10551 S.E. 110th Street
Candler, Florida 32111

Authorized Representative:
Mr. Toro Townley, President

Air Permit No. 0830136-005-AC
Permit Expires: 09/30/2013
Site Name: Townley Engineering and Manufacturing
Minor Source Air Construction Permit
Project Name: Various Changes No. 2

This is the final air construction permit, which authorizes various changes such as increasing the allowable operational hours (operate continuously) for all emission units, replacing an emission control device for Blasting Booth No. 1 (from a wet cyclone device to a dry cartridge dust collector), and adding an additional Blasting Room (Blasting Booth No. 3) that uses grit blasting materials. Blasting Booth No. 3 will use a high efficiency dust collector system for dust control. Blasting Booth No. 2 will continue to use a wet cyclone to control particulate emissions. Townley Engineering and Manufacturing (Standard Industrial Classification No. 3341) is located in Marion County at 10551 S.E. 110th Street in Candler, Florida. The UTM coordinates are Zone 17, 404.75 km East, and 3216.26 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is 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 this permit. 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 this final permit, 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 Orange County, Florida

DRAFT

_____ _____

Caroline D. Shine Effective Date
District Air Program Administrator
Central 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 Permit 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 _____ to the persons listed below.

Mr. Toro Townley, President **(ttownley@townley.net)**
Mr. Maxwell R. Lee, P.E., Koogler and Associates, Inc. **(mlee@kooglerassociates.com)**
Ms. Ana Oquendo, EPA Region 4: **(oquendo.ana@epamail.epa.gov)**

Clerk Stamp

FILED, on this date, pursuant to Section 120.52,
Florida Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.

DRAFT

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Townley Engineering and Manufacturing

Established in 1963, Townley Engineering and Manufacturing Company, Inc. is a mining equipment and supplies manufacturer. The facility consists of a rubber shop that includes three operations: (1) fabrication, (2) rubber hose lay-up, and (3) rubber lining. Custom fabrication hose begins with preparation of the flanges and integrated nipples, layup of the hose wear tube, fabric and reinforcement on the appropriate mandrel. When complete the hose is staged in the autoclave. After vulcanization, the hose is removed from the mandrel, inspected and shipped. Rubber lining of pipe and other metal components starts with fabrication or repair on re-lining projects, virgin rubber sheet is accurately cut and applied. The parts are autoclaved and painted to order.

The existing facility consists of the following emissions units.

Facility ID No. 0830136	
ID No.	Emission Unit Description
001	Sandblasting Booths (2)
002	Coatings Scavenger/Incinerator

Project Description

The purpose of this project is to authorize various changes such as increasing the allowable operational hours (operate continuously) for all emission units, replacing an emission control device for Blasting Booth No. 1 (from a wet cyclone device to a dry cartridge dust collector), and adding an additional Blasting Room (Blasting Booth No. 3) that uses grit blasting materials. Blasting Booth No. 3 will use a high efficiency dust collector system for dust control. Blasting Booth No. 2 will continue to use a wet cyclone to control particulate emissions.

This project will modify or add the following emissions units.

Facility ID No. 0830060	
ID No.	Emission Unit Description
001	**Blasting Booths (3) – Replacing the emission control device on Blasting Booth No. 1 (from a wet cyclone device to a dry cartridge dust collector) and adding an additional blasting room (Blasting Booth No. 3) that uses grit blasting materials. Blasting Booth No. 3 will use a high efficiency dust collector system for dust control. Blasting Booth No. 2 will continue to use a wet cyclone to control particulate emissions. Operation hours for the booths are not limited.**
002	Coatings Scavenger/Incinerator-fired by natural gas or propane. **Operation hours for the scavenger/incinerator are not limited.**

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

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- 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 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 synthetic non-Title V source for volatile organic compounds (VOCs), Total HAPs, and any individual HAP.
- This facility has three emergency power generators that are Generac spark ignition internal combustion engines (SI ICE), only one of the three engines meet the applicability compliance date of the NSPS and therefore, **is subject** to 40 CFR Part 60, Subpart A-General Provisions and 40 CFR Part 60, Subpart JJJJ- Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The conditions are incorporated into this permit (attached and part of this permit-see Appendices).

Engine No.	Location	Model	S/N	Engine Power	Purchase Date	Rule Applicability
1	Office Trailer	QT04524ANSN	4707820	45kW	05/10/07	None
2	Main Office	QT04524JNSN	4949880	45kW	04/16/09	Subpart JJJJ
3	CNC Shop	QT15068JNSNA	4854428	150kW	03/23/08	None

PERMIT HISTORY/AFFECTED PERMITS

The permit that was previously issued was Permit No. 0830136-004-AF

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Air Resource Management Section. The Central District's 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: 407-897-2930

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Air Resource Management Section (see above mailing address and phone number) or Local Air Program Name. The mailing address and phone number of the Local Air Program is: Address and Phone Number.

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

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions;
   d. Appendix D. Common Testing Requirements;
   e. Appendix E. 40 CFR Part 60, Subpart A; and
   f. Appendix F. 40 CFR Part 60, Subpart JJJJ

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. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility"

(AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Air FESOP Revision: This permit authorizes construction or modification of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. An air operation permit revision is required for continued operation of the permitted emissions unit(s). The permittee shall apply for an air operation permit revision at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for an air operation permit revision, 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.;

   c. copies of the most recent two months of records/logs specified in Specific Condition No. **A.14.**

   [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.]

A. Facility-Wide Specific Conditions

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001	**Blasting Booths (3) – Replacing the emission control device on Blasting Booth No. 1 (from a wet cyclone device to a dry cartridge dust collector) and adding an additional blasting room (Blasting Booth No. 3) that uses grit blasting materials. Blasting Booth No. 3 will use a high efficiency dust collector system for dust control. Blasting Booth No. 2 will continue to use a wet cyclone to control particulate emissions. Operation hours for the booths are not limited.**
002	Coatings Scavenger/Incinerator-fired by natural gas or propane. **Operation hours for the scavenger/incinerator are not limited.**

PERFORMANCE RESTRICTIONS

A.1. Authorized Fuel: The incinerator shall **only** fire natural gas or propane.
[Rules 62-210.200(PTE), F.A.C. and 62-4.070(3), F.A.C.]

A.2. Restricted Operation: The hours of operation for the emission units are not limited (**8760 hours per year**).
[Permit Application dated 09/23/11; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.3. VOC/HAP Emissions Limitations: The maximum **facility-wide** VOC/HAP emissions shall not exceed the following:

Pollutant	Emissions (tons per any consecutive 12-month period)
Total VOCs	Less than 25.0
Total HAPs	Less than 25.0
Individual HAP	Less than 10.0

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.4. General Visible Emissions (VE) Limitation for Blasting Booths: Visible emissions for each Blasting Booth are limited to less than 20 percent opacity.
[Rule 62-296.320(4)(b)1., F.A.C.]

A.5. VE Limitation for Incinerator: Visible emissions for the incinerator shall not exceed 5 percent opacity except that visible emissions not exceeding 15 percent opacity are allowed for up to six minutes in any one hour period.
[Rule 62-296.401(1)(a), F.A.C]

A.6. Unconfined Emissions of Particulate Matter: No person shall cause, let, permit, suffer, or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing, handling; without taking reasonable precautions to prevent such emissions. Pursuant to Rule 62-296.320(4) (c)1., 3 and

4., F.A.C., reasonable precautions to prevent unconfined emissions of particulate matter at this facility include the following requirements:

a) Use of hoods, fans or filters, and similar equipment to contain, capture and/or vent particulate matter; and containing abrasive blast material where possible. Conduct a monthly visual inspection of each filter used in the filter systems for the blasting booths.
b) Paving and maintenance of roads, parking areas and yards.

[Rules 62-4.070(3) and 62-296.320(4) (c)1., 3 and 4., F.A.C.]

TESTING REQUIREMENTS

A.7. **Compliance Tests for Incinerator: During each federal fiscal year (October 1st to September 30th), the incinerator shall be tested to demonstrate compliance with the emissions standards for visible emissions specified in Specific Condition A.5.**
[Rule 62-297.310, F.A.C.]

A.8. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.9. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method and Comments
EPA Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources: **Shall last thirty minutes for the incinerator.**

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

A.10. Emergency Generator in Main Office: In order to demonstrate compliance with NSPS, Subpart JJJJ, the permittee shall install a non-resettable hour meter upon startup of the emergency engine and operate and maintain the engine according to manufacturer's emission-related written instructions and keep records of conducted maintenance. The engine **is subject** to 40 CFR 60, Subpart JJJJ- Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The conditions are incorporated into this permit (attached and part of this permit, see Appendices – Appendix F).
[Rules 62-4.070(3), 62-204.800(8), F.A.C.; 40 CFR Part 60, §60.4237 and §60.4243]

A. Facility-Wide Specific Conditions

NOTIFICATION REQUIREMENTS

A.11. Test Notification: The permittee shall notify the Compliance Authority, 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 test contact person who will be responsible for coordinating and having such test conducted for the permittee.
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

A.12. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(8), F.A.C.]

A.13. Recordkeeping Log: In order to demonstrate compliance with Specific Conditions No. **A.1.**, **A.3.**, **A.6.,** and **A.10.**, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log at a minimum shall contain the following:

Monthly

a) Facility Name, Facility ID No. (i.e., Townley Engineering and Manufacturing, 0830136);
b) Designation of month and year of operation for which records are being tabulated;
c) Combined consecutive 12-month total of VOC emissions;
d) Combined consecutive 12-month total of individual and combined HAP emissions;
e) Type and quantity of fuel fired by incinerator for a consecutive 12-month period; and
f) Records required by Subpart JJJJ for engine located at the Main Office. Keep a record of the operational hours based on the non-resettable hour meter.
g) Record observation details of each filter visual inspection (see Condition A.6.a.). When a filter is replaced, make a note of the replacement in the log.

Note: A consecutive 12 month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 month totals using whatever number of months of data are available until such a time as a consecutive 12 month total can be maintained each month.

Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). Supporting documentation (Chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.]

A.14. **Additional Recordkeeping Requirements: Records specified in Specific Condition No. A.13. (previous condition) must document the method, calculations, and formulas used in**

determining the usage rate and the emission rate. All calculations, including those used to derive emissions, must be clearly documented, and may be presented in the form of a template of sample calculations and available for review on site by the Department.
[Rule 62-4.070(3), F.A.C.]