TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

Townley Foundry and Machine Company

Facility ID No. 0830136

PROJECT

Project No. 0830136-005-AC
Application for Air Construction Permit
Project Name: Various Changes No. 2

COUNTY

Marion County, Florida

PERMITTING AUTHORITY

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

December 5 and 6, 2011

Prepared by Jeffrey Rustin, P.E.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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

B. Professional Engineer:

Mr. Maxwell R. Lee, P.E.
Koogler and Associates, Inc.
4014 N.W. 13th Street
Gainesville, Florida 32609

C. Project Location:

Townley Foundry and Machine Company, Inc.
10551 S.E. 110th Street
Candler, Florida 32111

D. Project Summary:

This project 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.

E. Application Information:

Application Received and Complete: 09/23/2011

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	Blasting is 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	Incinerator and paint/solvents are sources of VOC and odors.
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	Y	EU No. 002 is subject to 62-296.401, F.A.C.-Incinerators (Small Incinerators). It is a unit specific requirement.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Marion County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.

Subject to:	Y/N	Comments
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	One of the facility's three spark ignition internal combustion units (SI ICE) **is subject** to 40 CFR 60, Subpart JJJJ.
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.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	Facility is a synthetic non-Title V source.

III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
PM/PM10	001- Blasting Booths	11.69	
	002- Coating Scavenger/Incinerator	4.1	
	Total	**15.79**	
NOX	**Total**	**1.4**	
VOC	**Total**	**3.3**	**<25.0**
Individual HAPs	**Total**		**<10.0**
HAPS	**Total**		**<25.0**

IV. Federal NSPS and/or NESHAP Provisions

A. Facility's incinerator is by definition a small incinerator with a charging rate of less than fifty (50) tons per day and therefore, is **not subject** to 40 CFR 60, Subpart E- Standards of Performance for Incinerators.

B. Facility has three Generac spark ignition internal combustion engines (SI ICE), only one of the three engines meet the applicability compliance date 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.

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

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, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

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).