Schneller, LLC
Florida Plant

Facility ID No. 1030118
Pinellas County

Title V Air Operation Permit Renewal

Permit No. 1030118-014-AV
(Renewal of Title V Air Operation Permit No. 1030118-011-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 632-7600
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Compliance Authority:

Pinellas County
Air Quality Division
300 South Garden Avenue
Clearwater, FL 33756
Telephone: 727/464-4422
Fax: 727/464-4420

Title V Air Operation Permit Renewal

Permit No. 1030118-014-AV

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DRAFT/PROPOSED PERMIT

PERMITTEE:
Schneller, LLC
6200 49th Street North
Pinellas Park, Florida 33781

Permit No. 1030118-014-AV
Florida Plant
Facility ID No. 1030118
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Florida Plant is located in Pinellas County at 6200 49th Street North, Pinellas Park, Florida. UTM Coordinates are: Zone 17, 334.16 East and 3079.24 North. Latitude is: 27° 49' 45" North; and, Longitude is: 82° 42' 03" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

(Draft/Proposed)

_____

Cindy Zhang-Torres, P.E.
Air Permitting Manager
Southwest District

CZT/NEK/pp

Subsection A. Facility Description.

This facility manufactures engineered decorative laminates and non-textile floor coverings for the transportation industry. The process involves casting a solvent based film on paper, then screen printing solvent based inks on the resulting film. The regulated emissions units include the screen printing, coating, the parts cleaning operations and a spark ignition reciprocating internal combustion engine. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
002	Screen Printing Operation
003	Coating Line with Thermal Oxidizer
006	Parts Cleaning Operations
008	Existing Stationary Spark Ignition (SI) RICE Engine
Unregulated Emissions Units and Activities	
007	Miscellaneous VOC/HAP Emissions
009	Natural Gas Fired Steam Boiler

Subsection C. Applicable Regulations.

Because there is a combined VOC emission limit of 31.7 TPY from EU Nos. 002, 003, and 006 and no HAP emission limit, this facility is considered a major source of hazardous air pollutants (HAPs). Because this facility operates a stationary reciprocating internal combustion engine, it is subject to regulation under 40 CFR 63, Subpart ZZZZ, - National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A, NESHAP General Provisions	003 & 008
40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating	003
40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines	008
Rule 62-296.500, F.A.C., Reasonably Available Control Technology (RACT)	003
Rule 62-296.504, F.A.C., Fabric and Vinyl Coating (RACT)	003
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	All

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices - The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated.
[Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited - No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rule 62-296.320(2) and 62-210.200 (Definitions), F.A.C.; Pinellas County Code, Section 58-178]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

(a) Ensure all lids, caps, covers on cans and other containers are properly fitted and maintained such that vapor emissions are minimized.

(b) Repair all leaks in piping, process equipment, and storage containers immediately and/or removing solvents to secure containers until repairs can be effected.

(c) All VOCs from solvent washing (equipment cleanup) shall be directed into containers that prevent evaporation into the atmosphere.

(d) For each parts cleaner, comply with each of the following requirements:

1. Equip the cleaner with a cover. The cover shall be so designed that it can be easily operated with one hand.
2. Equip the cleaner with a facility for draining cleaned parts. The drainage facility shall be constructed internally so that parts are enclosed under the cover while draining if the solvent volatility is greater than 0.6 pounds per square inch (31 millimeters of mercury or 4.1 kilopascals) measured at 100 degrees Fahrenheit (38 degrees Celsius), except that the drainage facility may be external for the applications where an internal type cannot fit into the cleaning system.
3. Provide a permanent, conspicuous label summarizing the operating requirements.
4. Store waste solvent only in covered containers.
5. Close the cover whenever parts are not being handled in the cleaner.
6. Drain the cleaned parts for at least 15 seconds or until dripping ceases.
7. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure which does not cause excessive splashing.

[Rule 62-296.320(1), F.A.C.; Construction Permit 1030118-007-AC]

FW4. General Visible Emissions - No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined 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 or handling; without taking reasonable precautions to prevent such emissions. Further precautions are not deemed necessary at this time.
[Rule 62-296.320(4)(c), F.A.C.; proposed by applicant in response to request for addition information received 11/03/2011]

Annual Reports and Fees
See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report - The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.
[Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee - The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm.
[Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA) - If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
002	Ink is applied through metal or plastic screen stencils onto coated film that comes from the coating line (EU No. 003), which is then dried in a natural gas fired drying oven with a maximum heat rate input of 0.5 MMBtu/hour. The ink used in this operation contains VOCs and/or HAPs.

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Fuels - The drying oven shall be fired with natural gas only.
[Rule 62-213.440, F.A.C.; Construction Permit No. 1030118-007-AC]

A.2. Hours of Operation - This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200 ("Potential to Emit"), F.A.C., Construction Permit No. 1030118-007-AC]

Emission Limitations and Standards

(Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit).

A.3. Volatile Organic Compound (VOC) Emissions – VOC emissions shall not exceed 1,500 lbs/month and 9.0 tons per any consecutive 12-month period.
[Rule 62-210.200 ("Potential to Emit") F.A.C.; Construction Permit 1030118-007-AC]

Recordkeeping and Reporting Requirements

A.4. Other Reporting Requirements - See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]

A.5. VOC Containing Material Usage Records - Records shall be kept of usage of all VOC containing materials to document compliance with the limitations of Specific Condition No. A.3. The records shall include, but not be limited to, the following:

Daily:

a. facility name and date;

b. Emission Unit No. and description;

c. substrate type coated;

d. "As Applied" coatings, inks and clean up solvents that were used, and the amount of each used in gallons;

e. VOC content, "As Applied", of each coating used, in lbs VOC/gallon of coating and the VOC content of each clean up solvent used, in lbs VOC/gallon of solvent;

Monthly:

f. facility name, month, and year; and

g. the calculated VOC emissions for the month (lbs) and for the most recent consecutive 12-month period (tons/consecutive 12-month period).

Records of all calculations used to determine VOC emissions, and supporting documentation ("As Supplied", "As Applied" sheets, MSD sheets, EPA data sheets, purchase orders, etc.) shall be kept for each ink, coating and solvent which includes sufficient information to determine VOC emissions. Daily records shall be completed within five business days and monthly records shall be completed by the end of the following month. The above records shall be maintained for five years and made available to the Department and the Pinellas County Air Quality Division upon request.

[Rules 62-4.070(3) and 62-213.440(1)(b)2.b., F.A.C.; Pinellas Co. Code, Section 58-90; Construction Permit 1030118-007-AC]

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
003	Solvent coatings mixed with vinyl particles are applied to paper then dried in a natural gas fired oven with a maximum heat rate input of 4.5 MMBtu/hour. The result is a vinyl film. VOC and organic HAP emissions are controlled by a Gehnrich & Gehnrich, Model HDFT-40H thermal oxidizer. The oxidizer is fired with natural gas at a maximum heat rate input of 4.0 MMBtu/hour.

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity - The maximum VOC input rate to the thermal oxidizer shall not exceed 256 lbs/hour (daily average basis).
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 1030118-012-AC]

B.2. Permitted Fuels - The drying oven and the thermal oxidizer shall be fired with natural gas only.
[Rule 62-213.440, F.A.C.; Construction Permit 1030118-007-AC]

B.3. Hours of Operation - This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit 1030118-007-AC]

B.4. Emissions Unit Operating Rate Limitation After Testing - See the related testing provisions in Appendix TR, Facility-wide Testing Requirements.
[Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

B.5. VOC Emission Limitations - VOC emissions shall not exceed the following:

a. 20.0 tons per any consecutive 12-month period; and

b. 3.8 lbs VOC/gal. of coating, excluding water, delivered to the coating line.

[Rules 62-210.200 ("Potential to Emit"), 62-296.504(2), F.A.C.; Construction Permit 1030118-007-AC]

B.6. Compliance - Compliance with the emission limits in Specific Condition No. B.5.b. shall be achieved by:

a. the application of low solvent content coating technology; or

b. incineration, provided that 90 percent of the volatile organic compounds such that the reduction would result in total (considering capture and destruction efficiency) VOC emissions equivalent to 7.86 lbs VOC/gal. of solids, or less.

[Rule 62-296.504(3), F.A.C.; Construction Permit 1030118-007-AC]

(Permitting Note: The facility has opted to comply with 40 CFR 63, Subpart JJJJ (see condition below) by maintaining an organic HAP control efficiency of no less than 95%. (See Specific Condition Nos. B.19. and B.20. and Appendix 40 CFR 63, Subpart JJJJ, Section 63.3370). The 95% destruction efficiency is more stringent than Rule 62-296.504(3), F.A.C., therefore compliance with 40 CFR 63, Subpart JJJJ ensures compliance with the 90% VOC RACT requirement.)

B.7. Visible Emission (VE) Limitations - No visible emissions (defined as ≤5 percent opacity) are allowed from the thermal oxidizer, except that visible emissions not exceeding 20 percent opacity are allowed for up to three minutes in any one hour period.
[Construction Permit 1030118-007-AC]

Monitoring of Operations

B.8. CAM Plan - This emissions unit is 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.]

Test Methods and Procedures

(Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

B.9. Test Methods - Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
DEP 9	Visual Determination of the Opacity of Emissions from Stationary Sources (a minimum of 60 minutes in duration)
24	Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings
25	Gaseous Nonmethane Organic Emissions *(Attachment 3 of EPA 450/2-78-041 may be used instead of EPA Method 25)*
25A	ASP No. 96-I-01 -Alternate Sampling Procedure to use EPA Method 25A in lieu of EPA Method 25 *(see Appendix ASP)*
204	Criteria for and Verification of a Permanent or Temporary Total Enclosure

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.

[Rule 62-297.401, F.A.C., Construction Permit 1030118-007-AC]

B.10. Common Testing Requirements - Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.
[Rule 62-297.310, F.A.C.]

B.11. Testing Requirements -

a. The permittee shall test the thermal oxidizer exhaust stack for visible emissions within 8 to 12 months prior to the expiration date of this permit to demonstrate compliance with Specific Condition No. B.7.

b. The permittee shall test the thermal oxidizer for VOC emissions, including the destruction efficiency, between 27 and 30 months from the effective date of this permit and again between 365 and 270 days before the expiration date of this permit to demonstrate compliance with the emission limits in Specific Condition Nos. B.5. and B.6.

c. The permittee shall demonstrate the capture efficiency for the coating line concurrently with the destruction efficiency test by either:

(1) show the enclosures continue to meet the requirements given in EPA Method 204, Criteria for and verification of a Permanent or Temporary Total Enclosure; or

(2) conduct a capture efficiency test for a temporary total enclosure pursuant to Rule 62-297.450, F.A.C.

[Rules 62-297.310(7), 62-297.440(7), and 62-297.450(1)(a), F.A.C.]

B.12. Additional Compliance Test Requirements - VOC emissions testing at the thermal oxidizer inlet and outlet shall be conducted using EPA Method 25, or Attachment 3 of EPA 450/2-78-041, or alternate sampling procedures approved in writing by the Department (i.e., ASP No. 96-I-01, attached). When conducting a compliance test, a sample of each coating shall be taken and an EPA Method 24 test performed. The coating sample must be at least 1 liter and be representative of the coating as applied during the test. Data provided from the coating formulator may be submitted in lieu of the Method 24 test if the certification form in EPA 450/3-84-019 is properly completed for each affected coating.
[Rules 62-4.070(3), 62-296.504(4)(b), and 62-297.401, F.A.C.]

B.13. Compliance Test Notification - The permittee shall notify the Pinellas County Air Quality Division at least 15 days prior to the date on which each formal compliance test is to begin (except for the capture efficiency test, see Specific Condition No. B.14.) 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 owner.
[Rule 62-297.310(7)(a)9, F.A.C.]

B.14. Capture Efficiency Test Notification - Should a capture efficiency test using a temporary total enclosure be required, the permittee shall notify the Pinellas County Air Quality Division 30 days prior to performing any capture efficiency test.
[Rule 62-297.450(4)(d), F.A.C.]

B.15. Modification Notification and Testing - A modification, as defined in Rule 62-210.200, is prohibited without prior approval by the Department, however if any other physical or operational change is made to the control system, the owner or operator shall notify the Air Permitting Section of the Department's Southwest District and the Pinellas County Air Quality Division of the change within 10 working days after making such change. The Department shall require the owner or operator of the affected activity, process, or emissions unit to conduct a new capture efficiency test and/or stack test if the Department has reason to believe (based on engineering calculations or empirical evidence) that a physical or operational change to the capture system has decreased the overall emissions reduction efficiency of the system.
[Rule 62-297.450(4)(c), F.A.C.]

Recordkeeping and Reporting Requirements

B.16. Reporting Schedule - The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition
Semiannual Compliance Report	January 31 and July 31	B.20.
Startup, Shutdown, Malfunction Report	January 31 and July 31	B.20.

[Rule 62-213.440, F.A.C.]

B.17. Other Reporting Requirements - See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]

B.18. Test Report Requirements - The permittee shall file a report to the compliance authority with the results of each required compliance test. The required test report shall be filed as soon as practical but not later than 45 days after the last sampling run of each test is completed. The test report shall provide, at minimum, the information required in Rule 62-297.310(8), F.A.C. In addition the report shall include the following:

a. overall VOC destruction efficiency and VOC capture efficiency results for the thermal oxidizer's VOC emission testing;

b. utilization rates of the coating(s) during the tests, in gallons per hour;

c. VOC loading rate to the thermal oxidizer during the test, in lbs/hour;

d. inlet and outlet VOC concentration of the thermal oxidizer and supporting calculations;

e. results of the Method 24 tests or a certification by the coating manufacturer of the composition of the coating if it is supported by actual batch formulations;

f. thermal oxidizer operating parameters such as temperature and flow rates;

g. EPA audit results, if applicable;

h. a copy of the daily log for each test day (*see Specific Condition No. B.19.*); and

i. a copy of the monthly log for the month the test was conducted (*see Specific Condition No. B.19.*)

Failure to submit the above data or the actual operating conditions may invalidate the test.

[Rules 62-4.070(3) and 62-297.310(8), F.A.C.]

B.19. VOC Containing Material Usage Records - Records shall be kept of usage of all VOC containing materials to document compliance with the limitations of Specific Condition No. B.1. The records shall include, at a minimum, the following:

Daily:

a. facility name and date;

b. Emission Unit No. and description;

c. applicable rule, e.g., Rule 62-296.504, F.A.C.;

d. substrate type coated;

e. "As Applied" coatings and clean up solvents that were used, and the amount of each used in gallons;

f. VOC content, "As Applied", of each coating used, in lbs VOC/gallon of coating and lbs VOC/gallon of solids, the VOC content of each clean up solvent used, in lbs VOC/gallon of solvent, and the resultant daily average lbs VOC/gallon of solids after controls, based on the latest approved test results;

g. hours of operation;

h. hourly VOC input (daily average) to the thermal oxidizer (lbs/hour);

i. hourly VOC output (daily average) from the thermal oxidizer (lbs/hour);

j. resultant lbs VOC/gallon of solids after control for each coating.

Monthly:

k. facility name, month, and year; and

l. calculated VOC emissions for the month (lbs) and for the most recent consecutive 12-month period (tons).

Records of all calculations used to determine VOC emissions, and supporting documentation ("As Supplied", "As Applied" sheets, MSD sheets, EPA data sheets, purchase orders, etc.) shall be kept for each coating and solvent which includes sufficient information to determine VOC emissions. Daily records shall be completed within five business days and monthly records shall be completed by the end of the following month. The above records shall be maintained for five years and made available to the Department and the Pinellas County Air Quality Division upon request.

[Rules 62-4.070(3), 62-213.440(1)(b)2.b., and 62-296.500(2)(b), F.A.C.; Pinellas Co. Code, Section 58-90; Construction Permit 1030118-007-AC]

Other Requirements

B.20. Federal Rule Requirements - In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in Appendix NESHAP 40 CFR 63, Subpart A – General Provisions and Appendix NESHAP 40 CFR 63 Subpart JJJJ – National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating which are attached to and made a part of this permit. The applicable requirements for 40 CFR 63, Subpart JJJJ are shown below.

NESHAP 40 CFR 63 Subpart JJJJ Applicable Provision References *

(Note - Entire section applies unless otherwise noted with specific applicable subsection references shown below the section caption.)

40 CFR Section	
§ 63.3280	What is in the subpart?
§ 63.3290	Does this subpart apply to me?
§ 63.3300	Which of my emission sources are affected by this subpart?

§ 63.3310 What definitions are used in this subpart?

§ 63.3320 What emission standards must I meet?
(b)(1)

§ 63.3321 What operating limits must I meet?
(a)

§ 63.3330 When must I comply?
(a)

§ 63.3340 What general requirements must I meet to comply with the standards?

§ 63.3350 If I use a control device to comply with the emission standards what monitoring must I do?
(a)(3) & (4), (b), (e)(1-9) and (f)

§ 63.3360 What performance tests must I conduct?
(a)(2), (e)(except (3)(ii)) and (f)

§ 63.3370 How do I demonstrate compliance with the emission standards?
(a)(4)(i), (e), (j) and (k)

§ 63.3400 What notifications and reports must I submit?
(a), (b)(1), (c) (except (2)(vi)), (d), (e), (f), (g)

§ 63.3410 What records must I keep?
(a)(1)(ii) and (v) and (a)(2)

§ 63.3420 What authorities may be delegated to the States?

Table 1 Operating Limits if Using Add-On Control Devices and Capture System
1. and 3.

Table 2 Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ

** (Permitting Note - The above applicability references are based upon current operations as reflected in the Title V permit renewal application received 08/15/11. Any change in operations may change the applicable provisions.)*

[Rules 62-204.800(11) and 62-213.440, F.A.C.; NESHAP 40 CFR 63 Subpart JJJJ]

B.21. Operation and Maintenance (O & M) Plan **- Not federally enforceable.** The attached O & M Plan, (or the plan as revised with prior approval of the Pinellas County Air Quality Division), shall be followed for the thermal oxidizer. The O & M documentation logs that are a part of the plan shall be maintained for a minimum of two years. The O&M plan shall include, but is not limited to:

a. Operating parameters of the pollution control device;

b. Time table for the routine maintenance of the pollution control device as specified by the manufacturer;

c. Time table for routine periodic observations of the pollution control device sufficient to ensure proper operation;

d. A list of the type and quantity of the required spare parts for the pollution control device which are stored on the premises of the permit applicant;

e. A record log which will indicate, at a minimum:

(1) When maintenance and observations were performed;

(2) What maintenance and observations were performed;

(3) Who performed said maintenance and observations; and

(4) Acceptable parameter ranges for each operational check.

[Pinellas County Code, Section 58-128]

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
006	The parts cleaning operations consist of MEK cleaning stations and drums. MEK parts cleaning stations are located in the screen print area and the color mixing area. The stations are cleaning tanks that are marked so fill capacities do not exceed 8 gallons. The tanks have self-closing lids with foot pedal opening mechanisms. The tanks are used to clean screen squeegees and small parts (spatulas, cups, etc.). Paint mixer propellers and shafts are placed in a drum of MEK after use. They are allowed to soak clean in the solvent drum until reuse is necessary. The solvent drum is closed except when shafts are being placed in or taken out. The drums are located in the color mixing area and the paint coating areas. A smaller drum (15 or 30 gallon) is used in the compound and screen print areas where product samples are manufactured. Halogenated solvent cleaning is not performed. Therefore, this emissions unit is not subject to 40 CFR 63 Subpart T, *National Emission Standards for Halogenated Solvent Cleaning.*

Emission Limitations and Standards

C.1. VOC Emissions Limitations - In order to qualify for an exemption from Rule 62-296.511, F.A.C., Reasonably Available Control Technology (RACT), Solvent Metal Cleaning, VOC emissions from the parts cleaning operations shall not exceed 2.7 tons per any consecutive 12-month period.
[Rule 62-296.500(3)(a), F.A.C.; Construction Permit 1030118-007-AC]

Recordkeeping Requirements

C.2. Monthly Records - Records shall be kept of usage of all VOC containing materials to document compliance with the limitations of Specific Condition No. C.1. The records shall include, but not be limited to, the following:

a. facility name, month, and year;

b. quantity of each VOC solvent used for parts cleaning;

c. quantity of VOC solvent removed for disposal; and

d. calculated VOC emissions for the month (lbs) and for the most recent consecutive 12-month period (tons).

Records of all calculations used to determine VOC emissions, and supporting documentation (MSD sheets, EPA data sheets, purchase orders, etc.) shall be kept for each solvent which includes sufficient information to determine VOC emissions. Monthly records shall be completed by the end of the following month. The above records shall be maintained for five years and made available to the Department and the Pinellas County Air Quality Division upon request.

[Rules 62-4.070(3) and 62-213.440(1)(b)2.b., F.A.C.; Pinellas Co. Code, Section 58-90; Construction Permit 1030118-007-AC]

Subsection D. This section addresses the following emissions unit (EU).

EU No.	Brief Description
008	Existing Stationary Spark Ignition (SI) RICE Engine *(listed below):*

Manufacturer & Model	HP Rating	SI Engine Type	Year of Manuf.	Description
Kohler 46755Ch	10	4SRB	Prior to 2006	Welder/Generator

(Permitting Note –The above engine is exempt from the construction permit requirements of Rule 62-210.300(1), F.A.C., in accordance with the provisions of Rule 62-210.300(3)(b)1., F.A.C. (Generic Emissions Unit or Activity Exemption).)

(Stationary SI RICE Engine Listing Note – The above stationary SI RICE engine at this facility is based upon additional information dated 11/28/2011, from Schneller, LLC, in response to a Department request for additional information.)

IMPORTANT REGULATORY CLASSIFICATIONS - The engine in this emission unit is regulated under NESHAP 40 CFR 63 Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines), as amended in the 08/20/10 Federal Register, as existing stationary Reciprocating Internal Combustion Engines (RICE) at a major source of hazardous air pollutants (HAPs).

Operation Requirements

D.1. Operating Hours - There are no specific limitations on operating hours for the existing stationary engine in this section listed above.

(Permitting Note - The maximum actual operating hours of this engine is inherently restricted by the limited purposes for which it is used.)

Applicable Federal Requirements

D.2. Federal 40 CFR 63 NESHAP Subpart ZZZZ Requirements - The existing stationary engine in this section listed above is subject to the applicable requirements of NESHAP 40 CFR 63 Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE)), which is attached to this permit as Appendix NESHAP 40 CFR 63 Subpart ZZZZ, as it applies to existing RICE at major sources of hazardous air pollutants (HAP). The applicable requirements are shown in the Appendix 40 CFR 63, Subpart ZZZZ Applicability Table attached to this permit, under the category Non-emergency SI 4SRB < 100HP.
[Rule 62-4.070(3), F.A.C.; NESHAP 40 CFR 63 Subpart ZZZZ]

*(Compliance Note – The final compliance date for the applicable Subpart ZZZZ requirements for the existing spark ignition (**SI**) RICE engine is 10/19/2013. (40 CFR 63.6595(a)(1).)*

D.3. Federal NESHAP 40 CFR 63 Subpart A General Provisions Requirements - The engine in this section listed above is subject to the applicable requirements of NESHAP 40 CFR 63 Subpart A (General Provisions for 40 CFR 63), as adopted and incorporated by reference in Rules 62-204.800(11)(d), F.A.C., which is attached to this permit as Appendix NESHAP 40 CFR 63 Subpart A. The applicable requirements of Subpart A are shown in Table 8 to 40 CFR 63 Subpart ZZZZ *(see Appendix NESHAP 40 CFR 63 Subpart ZZZZ)*.
[Rule 62-208.800(11)(d), F.A.C.; NESHAP 40 CFR 63 Subpart ZZZZ]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.

Appendix ASP, ASP Number 96-I-01.

Appendix CAM, Compliance Assurance Monitoring Plan.

Appendix I, List of Insignificant Emissions Units and/or Activities.

Appendix NESHAP 40 CFR 63, Subpart A – General Provisions.

Appendix NESHAP 40 CFR 63, Subpart JJJJ - Paper and Other Web Coating.

Appendix NESHAP, 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Appendix 40 CFR 63, Subpart ZZZZ, Applicability Table.

Appendix RR, Facility-wide Reporting Requirements.

Appendix TR, Facility-wide Testing Requirements.

Appendix TV, Title V General Conditions.

Appendix U, List of Unregulated Emissions Units and/or Activities.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History.

Table 1, Summary of Air Pollutant Standards and Terms.

Table 2, Compliance Requirements.

Startup, Shutdown and Malfunction Plan (includes the Operation and Maintenance Plan for the Gehnrich & Gehnrich thermal oxidizer).

Statement of Basis.