Title V Air Operation Permit Renewal
Permit No. 1030118-014-AV

APPLICANT

The applicant for this project is Schneller, LLC. The applicant's responsible official and mailing address are: Eric Custis, Schneller, LLC, Florida Plant, 6200 49th Street North, Pinellas Park, FL 33781.

FACILITY DESCRIPTION

The applicant operates the Florida Plant, which is located at 6200 49th Street North in Pinellas Park, FL.

This facility casts a solvent based film on paper, then screen prints solvent based inks on the resulting film. Vinyl particles are dissolved in the solvent. The regulated emissions units include the screen printing (EU 002), coating line (EU 003) and the parts cleaning operations (EU 006). The coating line has a thermal oxidizer to control VOC/HAP emissions.

The coating line (EU 003) is regulated by Rule 62-296.504, F.A.C., Reasonably Available Control Technology (RACT), Fabric and Vinyl Coating and 40 CFR 63 Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, which is adopted and incorporated by reference in Rule 62-204.800, F.A.C.

The parts cleaning operations (EU 006) are exempt from Rule 62-296.511, F.A.C., Reasonably Available Control Technology (RACT), Solvent Metal Cleaning, due to the low level of emissions. Halogenated solvent cleaning is not performed at this facility. Therefore, this emissions unit is not subject to 40 CFR 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning.

The existing stationary spark ignition RICE engine (EU 008) is subject to 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued February 12, 2007
Title V Air Operation Permit Transfer of Ownership issued August 14, 2007
Application for a Title V Air Operation Permit Renewal received August 15, 2011
Additional Information Request dated September 2, 2011
Additional Information Response received November 3, 2011
Notice of Intent to Issue Air Permit issued **[Month day, year]**
Public Notice Published **[Month day, year]**

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate emissions units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to Emissions Unit No. 003, Coating Line for the regulated emissions of volatile organic compounds which are controlled by a thermal oxidizer.

PROJECT REVIEW

Following are changes made as a part of this renewal:

Written in Tallahassee new Title V format

Updated rule references.

Removed hours of operation from EU 002 recordkeeping, as it is not necessary.

Added a specific condition for using only natural gas in the EU 003 drying oven and thermal oxidizer in accordance with Construction Permit 1030118-007-AC, Specific Condition No. A.2.

Changed testing frequency of EU 003 from three times between permit issuance and permit renewal to twice (prior to renewal and halfway through the 5 year permit period).

Removed the reference to the incinerator rule (62-296.401(1)(a), F.A.C.) for the VE limit for EU 003 since a thermal oxidizer is not considered an incinerator subject to this rule.

Removed Emission Unit 004, Rotogravure Printing Line which was permanently shut down on July 27, 2007.

Put the boiler that was previously on the Insignificant List onto the Unregulated List since the potential emissions are over 5 TPY.

Removed reference to kerosene in EU 006 because it is no longer used.

Updated the Startup, Shutdown, Malfunction Plan (that includes the O & M Plan).

CONCLUSION

This project renews Title V air operation permit No. 1030118-011-AV, which was issued on February 12, 2007. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.