Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

DRAFT PERMIT

PERMITTEE

Madico Window Films, Inc.
2630 Fairfield Avenue South
St. Petersburg, FL 33712

Authorized Representative:
Mr. Shawn Kitchell, Vice President of Operations

Air Permit No. 1030119-015-AC
Permit Expires: 05/31/2013
Minor Air Construction Permit
Project Name: Change Testing and Recordkeeping Requirements

This is the final air construction permit which lowers the volatile organic compounds (VOC) emissions limit for Emissions Unit No. 003, reduces the required test frequency of the facility's Regenerative Thermal Oxidizer (RTO) and revises some related recordkeeping requirements. The facility is located in Pinellas County at 2544 Terminal Drive South in St. Petersburg, Florida (Standard Industrial Classification No. 2672). The UTM coordinates are Zone 17, 335.4 km East, and 3071.9 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to 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 Hillsborough County, Florida
DRAFT

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Kelley M. Boatwright Effective Date
District Air Program Administrator
Southwest 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 the date indicated below to the persons listed below.

Mr. Shawn Kitchell, Madico Window Films, Inc. (skitchell@madico.com)
Mr. A.J jablonowski, Epsilon Associates (ajablonowski@epsilonassociates.com)
Mr. George Lipka, P.E., Tetra Tech Inc. (george.lipka@tetratech.com)
Mr. Gary Robbins, Pinellas County Air Quality Division (grobbins@pinellascounty.org)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

DRAFT

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(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility manufactures metalized and reflective window coating films (window tinting) and is a source of volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The facility consists of one emissions unit which includes two coating lines, a mixing room, a laboratory and a regenerative thermal oxidizer (RTO) used to control emissions.

Facility ID No. 1030119	
ID No.	**Emission Unit Description**
003	Coating Line Nos. 1 and 2, and the facility's mixing room and laboratory controlled by a regenerative thermal oxidizer.

Project Description and Affected Emission Units

This project includes the following modifications:

- the VOC emissions limit for E.U. ID No. 003 is lowered from 245 to 74 tons per any consecutive 12 month period;
- the test frequency of the facility's RTO is reduced from once every federal fiscal year to once every five years, prior to renewal;
- the daily recordkeeping requirement used to demonstrate compliance with the maximum VOC loading rate to the RTO is no longer required provided the RTO is tested at or above 90% of the permitted capacity (i.e., maximum VOC loading rate);
- per batch records are allowed as an alternative to daily records associated with VOC RACT standards 62-296.503(2), F.A.C. ; and,
- the laboratory is removed from the emissions unit description (E.U. ID 003) and reclassified as an exempt activity.

This project will modify the following emissions unit.

Facility ID No. 1030119	
ID No.	**Emission Unit Description**
003	Coating Line Nos. 1 and 2, and the facility' mixing room controlled by a regenerative thermal oxidizer.

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

Exempt Emission Units/Activities

The laboratory, which is used for quality control (QC) testing of samples only, is exempt under Rule 62-210.300(a), F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).

- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

Modifies Permit No. 1030119-010-AC. Reference Permit No. 1030119-012-AV.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   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 Pinellas County Air Quality Division (PCAQD). The PCAQD mailing address and phone number is:

   Pinellas County Air Quality Division
   509 S. East Avenue
   Clearwater, Florida 33760
   Telephone: 727-464-4422

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; and
   d. Appendix D. Common Testing Requirements.

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 Title V Air Operation Permit: This construction permit is being processed concurrently with a Title V revision application (1030119-016-AV), which incorporates the changes made in this construction permit.

A. EU No 003

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
003	Coating Line Nos. 1 and 2, and the facility's mixing room controlled by a regenerative thermal oxidizer.

PERFORMANCE RESTRICTIONS

A.1. Federal Regulatory Requirements: This emission unit is subject to 40 CFR 63, Subpart JJJJ–National Emission Standard for Paper and Other Web Coating, which is adopted by reference in Rule 62-204.800, F.A.C.
[Rule 62-204.800(11), F.A.C.]

A.2. Permitted Maximum VOC Loading Rate: The maximum VOC loading rate into the RTO is limited to 845 lbs/hr (daily average).

{Permitting notes: (1) Demonstration of compliance with the VOC loading rate limitation is necessary only during test periods provided the RTO is tested at or above 90% of the permitted maximum VOC loading rate. If the RTO is tested below 90% of the Permitted Maximum VOC loading rate, then daily average loading rate recordkeeping is required. Operation at or above 90% of the permitted maximum VOC loading rate represents the worst case operation scenario that cannot be achieved during actual production. (2) See Specific Condition A.10. for Operation During Testing requirements.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Application Dated 10/25/2012]

A.3. Hours of Operation: The hours of operation are not limited (i.e., permitted for 8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1030119-010-AC]

EMISSIONS STANDARDS

A.4. VOC Emissions Standard: The facility-wide VOC emissions shall not exceed the following maximum limits:

Pollutant	Maximum Annual Emissions (Tons per any consecutive 12-month period)
VOC	74

[Rule 62-210.200(PTE), F.A.C.; Permit Application Dated 10/25/2012]

A.5. VOC RACT Emission Limiting Standard: VOC emissions from each coating line shall not exceed 4.79 pounds per gallon of solids (2.9 pounds per gal of coating, excluding water), daily or batch average, delivered to the coating applicator from a coating line.
[Rules 62-296.500(6) & 62-296.503(2), F.A.C.]

A.6. VOC RACT Control Technology Standards: The permittee shall satisfy the requirement of the "VOC RACT Emission Limiting Standard" listed in Specific Condition No. A.6. using the following control technologies;

a. The application of low solvent content coating technology; or,

b. Incineration, provided that 90 percent of the volatile organic compounds (VOC measured as total combustible carbon) which enter the incinerator (RTO) are oxidized to carbon dioxide and water.

{Permitting note: Please refer to 40 CFR 63, Subpart JJJJ, §63.3320, which provides for a more restrictive control efficiency for HAP emissions}

[Rules 62-296.500(6) & 62-296.503(3), F.A.C.]

TESTING REQUIREMENTS

A.7. Compliance Tests: The RTO shall be tested to demonstrate compliance with the VOC destruction requirements of Specific Condition No. A.6.b. at least 270 days prior to but no more than 365 days prior to the Title V permit expiration date.
[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. RTO Destruction Efficiency Test Methods: VOC emissions testing at the RTO inlet and outlet shall be conducted using EPA Methods 1-4, and 25 or Attachment 3 of EPA 450/2-78-041. The testing may be conducted using the production simulation procedure in Attachment B of this permit. When conducting a compliance test while the line is under actual production using coatings, a sample of each coating shall be taken and an EPA Method 24 test shall be performed. The coating sample must be at least 1 liter and be representative of the coating as applied to the substrate. 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 62-296.503(4), 62-297.620, 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

A.10. Operation During Testing. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. Additionally, compliance testing should be conducted while the RTO is operating within 90-100% of the maximum permitted VOC loading rate as specific in Specific Condition No. A.2. (845 lb/hour, test average), if feasible. This may be accomplished through coating line operation or use of the approved production simulation (Attachment B).
[Rules 62-297.310(2) and 62-4.070(3), F.A.C.; permit application dated 10/25/2012]

NOTIFICATION REQUIREMENTS

A.11. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact

person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

{*Permitting note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*}

[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. Additionally, the permittee shall include the following information:

a. The test data and calculations required to demonstrate compliance with Specific Condition No. A.6.b.

b. The inlet and outlet gas temperature to and from the RTO during the tests and supporting temperature charts (or equivalent).

c. Utilization rates of the coating(s) and solvents during the tests, in gal/hr.

d. The VOC loading rate to the RTO, in lbs/hr for the test period (for Lines 1 & 2 combined).

e. The VOC outlet concentration from the RTO and supporting calculations.

f. The overall VOC reduction efficiency and VOC capture efficiency results required to demonstrate compliance with Specific Condition No. A.6.b., if applicable.

g. The results of the Method 24 tests, if applicable.

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

[Rules 62 4.070(3) & 62-297.310(8), F.A.C.; Construction Permit No. 1030119-010-AC]

A.13. Recordkeeping: The permittee shall maintain the following daily* and monthly records:

a. Daily Records.* To document compliance with the operating and emissions limitations of Specific Condition Nos. A.2. and A.5., the permittee shall maintain the following records for each coating line:

1) Facility Name, Facility ID (1030119), Emission Unit ID (003) and Date.

2) The applicable rule [Rule 62-296.503, F.A.C., *Paper Coating (RACT)*].

3) The source description (Line 1 or Line 2).

4) The application method and substrate type (metal, plastic, paper, etc.).

5) Each "As Applied" coatings and clean up solvents (by identification number) used, and the amount of each used in gallons.

6) The VOC content, "As Applied", of each coating used, in lbs VOC/gal of coating and lbs VOC/gal of solids; the VOC content of each clean up solvent and diluent used, in

lbs VOC/gal; and the resultant daily average lbs VOC/gal of solids after controls, for coatings plus diluents, based on the latest approved test results.

*{*Permitting note: Per-batch records shall suffice to meet the daily records requirements}*

b. Daily RTO Loading Rate Records. If RTO Destruction Efficiency Test is performed at a VOC loading rate that is less than 90% of the maximum permitted VOC loading rate specified in Specific Condition No. A.2., then the permittee shall maintain records of the hourly VOC input (daily avg.) to the RTO, in lbs/hr (for Lines 1 & 2 combined).

c. Monthly Records. To document compliance with the emissions limitations of Specific Condition No. A.4., the permittee shall maintain the following records (based on the daily records above):

1) Facility Name, Facility ID (1030119), Emission Unit ID (003) and Date.
2) The source description (Line 1 or Line 2, or facility wide).
3) The monthly VOC usage (lbs).
4) The calculated VOC emissions for the month based on the latest approved test results.
5) The calculated VOC emissions for the month for the most recent consecutive 12-month period based on the latest approved test results.

Records of all calculations used to determine VOC emissions, and supporting documentation ("As Supplied", "As Applied" sheets, MSDS sheets, EPA data sheets, purchase orders, etc.) shall be kept for each coating and solvent which includes sufficient information to determine VOC solvent emissions.

[Rules 62-296.500(2)(b) & 62-4.070(3), F.A.C.; Pinellas County Code Section 58-90; and permit application dated 10/25/2012]

{Permitting note: Except for the changes specified in the conditions above, this emissions unit (E.U. No 003) remain subject to the all other valid conditions contained in the current Title V permit.}