TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

Facility ID No. 1030119

PROJECT

Project No. 1030119-015-AC
Application for Minor Air Construction Permit
Project Name: Change Testing and Recordkeeping Requirements

COUNTY

Pinellas County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

December 28, 2012

Prepared by Danny Stubbs

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. Facility Description:

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

II. Project Description:

A. Applicant:

Mr. Shawn Kitchell, Vice President of Operations
Madico Window Films, Inc.
2630 Fairfield Avenue South
St. Petersburg, FL 33712

B. Professional Engineer:

Mr. George Lipka, P.E
Tetra Tech Inc.
160 Federal Street, 3rd Floor
Boston, MA 02110

C. Project Location:

The facility is located in Pinellas County at 2544 Terminal Drive South in St. Petersburg, Florida

D. Project Summary:

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.

Note: Operation of the RTO at or above 90% of the permitted maximum VOC loading rate represents the worst case operation scenario that cannot be achieved during actual production (see Attachment B, Description of Product Simulation During VOC Compliance Testing). This is the justification for removing the daily recordkeeping which requires the permittee to maintain "hourly VOC input (daily ave.) to RTO" from the permit (See Specific Condition No A.22.7. in Permit No. 1030119-012-AV).

E. Application Information:

Application Received on: 10/25/2012
Application Complete: 10/25/2012

III. Applicable State and Federal Regulations

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 62-210.300, F.A.C. – Permits Required	Y	Subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	This facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	The film coating operations could be a source of unconfined particulate matter emissions.

Subject to:	Y/N	Comments
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	The film coating operations are a source of VOC and could be a source of odors.
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	Y	Subject to rule 62-296.500 & 62-296.503, F.A.C.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category.
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)	Y	EU No. 003 is subject to 40 CFR 63, Subpart JJJJ.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	This facility is a Title V source.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VOC testing is required for EU No. 003

IV. Summary of Emissions

Pollutant	EU No.	Potential Emissions (tpy)	Allowable Emissions (tpy)
VOC	003	74	74

{Note: The allowable emissions specific in the table above was requested by applicant in the permit application dated 10/25/2012}

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, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

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).