Title V Air Operation Permit Revision
Permit No. 1030119-016-AV

APPLICANT

The applicant for this project is Madico Window Film, Inc. The applicant's responsible official and mailing address are: Mr. Shawn Kitchell, Vice President of Operations, Madico Window Films, Inc., 2630 Fairfield Avenue South, St. Petersburg, Florida 33712.

FACILITY DESCRIPTION

The applicant operates the Madico Window Film, Inc. facility, which is located at 2544 Terminal Dr. South, St. Petersburg, Florida.

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 (E.U. No. 003) that includes two coating lines, a mixing room, and a regenerative thermal oxidizer (RTO) used to control emissions from the process. Coating Line Nos. 1 and 2 are regulated by Rule 62-296.503, F.A.C., Reasonably Available Control Technology (RACT), Paper Coating.

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

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility to incorporate the terms and conditions of Construction Permit No. 1030119-015-AC, issued on **[Month day, year]**.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit (No. 1030119-006-AV) issued August 14, 2005
Title V Air Operation Permit Revision (No. 1030119-008-AV) issued December 26, 2007
Title V Air Operation Permit Administrative Correction (No. 1030119-009-AV) issued April, 2, 2008
Application for a Title V Air Operation Permit Renewal received February 8, 2010
Additional Information Request dated March 19, 2010
Additional Information Response received May 3, 2010
Renewed Title V Air Operation Permit (No. 1030119-013-AV) issued September 15, 2010
Title V Air Operation Permit Administrative Correction (No. 1030119-013-AV) issued November 29, 2011
Title V Air Operation Permit Administrative Correction (No. 1030119-014-AV) issued February 6, 2012
Application for a Title V Air Operation Permit Revision October 25, 2012

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. (Emissions Unit No 003 is subject to Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating.)

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. Emissions Unit 003 is subject to CAM for the regulated emissions of VOCs, which are controlled by a Regenerative Thermal Oxidizer.

PROJECT REVIEW

The purpose of this project is to incorporate Construction Permit No. 1030119-015-AC, which lowers the volatile organic compounds (VOC) permitted limit for Emissions Unit No. 003 from 245 to 74 tons per year, relaxes the facility's Regenerative Thermal Oxidizer (RTO) testing requirement from once every federal fiscal year to once every five years, and revises some of the related recordkeeping requirements

The permit maintains the old Title V format, but replaces some of the old appendices with the new appendices (i.e., appendices included in the new formatted Title V permit which became the standard for Title V Renewal permits in 2011).

Changes to the Title V Permit specific conditions include the following:

- The emissions unit description for Emissions Unit No. 003 was revised to remove the laboratory equipment from the description. The laboratory equipment was added to Appendix I (List Of Insignificant Emissions Units And/Or Activities) and is considered insignificant.
- A permitting Note was added below Specific Condition No. A.1. The note explain that demonstration of compliance with the loading rate (with recordkeeping) is necessary only if the RTO is tested below 90% of the permitted capacity.
- Specific Condition No. A.4. was modified to reduce the maximum VOC emissions limit from 245 tons/year to 74 tons/year.
- Specific Condition No. A.9. was modified to relax the RTO destruction efficiency testing frequency from once every federal fiscal year to once every five years prior to renewing the Title V permit.
- Specific Condition No. A.15.d. was modified to clarify that the compliance test report's VOC loading rate to the RTO is specifically the loading rate for Coating Line Nos. 1 & 2 combined.
- Specific Condition No. A.22.a.7 was deleted and replaced with Specific Condition No. A.22.b. Specific Condition A.22.b. requires the permittee to keep records of the hourly VOC input to the RTO if the RTO is tested below 90% of the permitted capacity.

Additionally, in the CAM Plan, the QIP threshold temperature was reduced from 1,641 to 1,516 ^{o}F, and TV-6 (version dated 11/10/2008) was replaced with Appendix TV (version dated 2/16/2012)

The changes to the conditions are shown in the Draft/Proposed Title V Permit with a ~~strikethrough format~~ for deletions and Shaded format for additions.

CONCLUSION

This project revises Title V Air Operation Permit No. 1030119-012-AV, which was issued on September 14, 2012. This revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.