Madico Window Films, Inc.
Facility ID No.: 1030119
Pinellas County

Title V Air Operation Permit Revision

Draft/Proposed Permit Project No.: 1030119-016-AV
Revision to Title V Air Operation Permit No.: 1030119-012-AV

Revision Formatting Note:
In order to highlight the changes being made to permit No.1030119-012-AV, revisions are presented in this DRAFT/PROPOSED permit in shaded/~~strikethrough~~ format with shaded areas indicating the additions and ~~strikethrough~~ indicating deletions from permit 1030119-012-AV. This formatting will be removed in the final permit

Permitting Authority:
Florida Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Telephone: 813-632-7600
Fax: 813-632-7668

Compliance Authority:
Pinellas County Air Quality Division
~~300 South Garden Avenue~~
509 S. East Avenue
Clearwater, FL 33756

Telephone: 727-464-4422
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Title V Air Operation Permit Revision

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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

Permittee:
Madico Window Films, Inc.
2630 Fairfield Avenue South
St. Petersburg, Florida 33712

Draft/Proposed Permit No.: 1030119-016-AV
Facility ID No.: 1030119
SIC No(s).: 26, 2672
Project: Title V Air Operation Permit Revision

This permit revision is being issued for the purpose of incorporating the terms and conditions of Air Construction Permit, No. 1030119-015-AC, which lowers the volatile organic compounds (VOC) emissions 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. This existing facility is located at 2544 Terminal Drive South, St. Petersburg, Pinellas County; UTM Coordinates: Zone 17, 335.4 km East and 3071.9 km North; and, Latitude: 27° 45' 44" North and Longitude: 82° 40' 11" West.

This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

- Appendix CAM, Compliance Assurance Monitoring Requirements
- Appendix I~~-1~~, List of Insignificant Emissions Units and/or Activities
- Appendix RR, Facility-wide Reporting Requirements (version dated 9-17-09)
- Appendix SS-1, Stack Sampling Facilities Version Dated 10/07/96
- Appendix TR, Facility-wide Testing Requirements (version dated 9-12-08)
- Appendix TV~~-6~~, Title V Conditions (version dated ~~06/23/06 with AOR and Renewal updates 11/10/2008~~ 02/16/12)
- Attachment A, Subpart JJJJ Applicability Table
- Attachment B, Description of Product Simulation During VOC Compliance Testing
- Attachment C, Operation and Maintenance (O&M) Plan
- Attachment D, 40 CFR 63 Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP): Paper and Other Web Coating
- Attachment EPA-450/2-78-041: Measurement of Volatile Organic Compounds
- Table 297.310-1, Calibration Schedule version dated 10/07/96

Initial Effective Date: September 14, 2010
Revision Effective Date: (ARMS Day 46)
Renewal Application Due Date: February 1, 2015
Expiration Date: September 14, 2015

DRAFT

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Kelley M. Boatwright
District Air Program Administrator
Southwest District

KMB/ds

Subsection A. Facility Description.

This facility manufactures metalized and reflective window coating films (window tinting) and is a source of volatile organic compounds (VOC~~s~~) and hazardous air pollutants (HAPs). The facility consists of one emissions unit that includes two coating lines, a mixing room~~, a laboratory~~ and a regenerative thermal oxidizer (RTO) used to control emissions. Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Revision application received October 25, 2012, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
003	Coating Line Nos. 1 and 2, and the facility's mixing room ~~and laboratory~~ are controlled by a regenerative thermal oxidizer.

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Note: Construction Permit No. 1030119-010-AC replaced the facility's two catalytic oxidizers used to control emissions from coating line numbers 1 and 2 (E.U. Nos. 001 and 002) with one RTO. This modification also resulted in the replacement of E.U. Nos. 001 and 002 with E.U. No 003.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

- Appendix A~~-1~~, Abbreviations, Acronyms, Citations, and Identification Numbers
- ~~Appendix H-1~~Table H, Permit History
- Statement of Basis

These documents are on file with the permitting authority:

- 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
- Letter dated November 17, 2011, for an Administrative Correction to change the name of the facility
- Application for a Title V Air Operation Permit Revision received October 25, 2012

The following conditions apply facility-wide:

1. APPENDIX TV-~~6~~, TITLE V CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.; Pinellas Co. Code, Sec. 58-178, and Construction Permit No. 1030119-010-AC]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance for visible emissions pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. 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

and,

b. The permittee shall 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]

5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

6. General Pollutant Emission Limiting Standards. 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 (VOC) or organic solvents (OS) 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 shall be properly fitted and maintained such that vapor emissions are minimized, and

b. Repairing all leaks in piping, process equipment and storage containers immediately and/or removing solvents to secure containers until repairs can be affected.

[Rule 62-296.320(1), F.A.C.; and Construction Permit No. 1030119-010-AC]

7. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

8. Statement of Compliance Submittal. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Southwest District Office of the Department and to the EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
~~*Note to Permittee: See Appendix TV-6, Nos. 24(3) and 51.*~~
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

9. Compliance Submittals. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Southwest District and to the Pinellas County Air Quality Division (PCAQD) at the following addresses:

Department of Environmental Protection
Southwest District Office
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813/632-7600; Fax: 813/632-7668

and,

Pinellas County Air Quality Division
~~300 South Garden Avenue~~
509 S. East Avenue
Clearwater, FL 33756
Telephone: 727-464-4422; Fax: 727-464-4420

10. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; F: 404/562-9163

11. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

NOTES TO PERMITTEE:

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

~~**IMPORTANT**: Please note the following Title V submittal requirements contained in Appendix TV- 6 (Title V Conditions):~~

- Annual Operating Report (AOR) - see Appendix ~~TV- 6, item 24(3)~~ RR, item RR5.
- Annual Statement of Compliance - see Appendix ~~TV- 6, item 51~~ RR, item RR7.
- Permit Renewal Application - see Appendix ~~TV- 6, item 5~~ TV, item TV18.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
003	Coating Line Nos. 1 and 2, and the facility's mixing room ~~and laboratory~~ controlled by a regenerative thermal oxidizer.

The facility manufactures various types of window coating films (window tinting). The films are roller coated in web-coating machines. Coating Line No. 1 has one coating head and Coating Line No. 2 has three coating heads. Each coating line has a two-zone drying oven and each oven use air-to-air heat-exchange systems as the primary source of heat to dry the window tint films. When there is insufficient heat available from the air-to-air heat exchanges systems, the oven in Coating Line No. 1 uses natural-gas burners (present in the oven) as backup heat source and the oven in Coating Line No. 2 uses steam (provided by a back-up boiler fired exclusively on natural gas) as a backup heat source. The dryer oven zone operating temperatures range is from approximately 135 to 350 degrees F (typically maintained at 135-260 degrees F). Some product runs do not require the use of the ovens.

This emissions unit includes Coating Line Nos. 1 and 2, and the facility's mixing room ~~and laboratory~~. The enclosures for the coating lines and mixing room are Permanent Total Enclosures that meet the requirements given in EPA Method 204. VOC emissions from the process are controlled by a Langbein-Engelbracht Model #TR 3295 Regenerative Thermal Oxidizer (RTO). The RTO is in operation during coating and during clean up operations involving the use of VOC containing materials. The RTO has a design heat input rate of 6.0 MMBtu/hour and is fired with natural gas. The maximum VOC process feed rate to the RTO is 845 lb/hr (10.14 tons/day). The VOC feed rate to the RTO consists of 475 lb/hr of VOCs from Coating Line 1 and 370 lb/hr of VOCs from Coating Line 2. The RTO is rated for 32,000 SCFM and has a destruction efficiency of 98%. The combustion chamber operating temperature range is between 1400 and 1700 degrees F.

This emissions unit is subject to the VOC compliance assurance monitoring requirements included in Appendix CAM. The RTO operating temperature is the performance indicator that is measured and monitored continuously by the RTO Computer.

IMPORTANT REGULATORY CLASSIFICATIONS - This emissions unit is subject to Rule 62-296.503, F.A.C., Reasonably Available Control Technology (RACT), Paper Coating; 40 CFR 63 NESHAP Subpart JJJJ – National Emission Standard for Paper and Other Web Coating, adopted and incorporated by reference in Rule 62-204.800, F.A.C.; and Compliance Assurance Monitoring (CAM), adopted and incorporated by reference in Rule 62-204.800, F.A.C.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. 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 above 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.14. for Operation During Testing requirements. (3) See Attachment B, Description of Product Simulation During VOC Compliance Testing.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit ~~1030119-010-AC~~ No. 1030119-015-AC]

A.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1030119-010-AC]

A.3. Circumvention of RTO Control Device. The permittee shall not circumvent any air pollution control device or allow the emissions of air pollutants without the applicable air pollution control device (i.e., RTO) operating properly. This shall include the following:

a. The enclosure and capture system shall be properly maintained and operated.

b. The RTO and drying ovens shall be fired with natural gas only.

c. The RTO shall be operated at all times when coating operations involve VOC containing materials.

d. The RTO shall be operated during all clean-up operations involving VOC containing materials.

[Rules 62-210.650 and 62-4.070(3), F.A.C.; Construction Permit No. 1030119-010-AC]

Emission Limitations and Standards

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

Pollutant	Maximum Annual Emissions (Tons per any consecutive 12-month period)
VOC	~~245~~ 74

[Rule 62-210.200(PTE), F.A.C.; Construction Permit ~~1030119-010-AC~~ No. 1030119-015-AC]

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 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.5. 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.]

A.7. 40 CFR 63 NESHAP Requirements. This emissions unit is subject to and shall comply with the applicable requirements of 40 CFR 63 (NESHAP) Subpart JJJJ (Paper and Other Web Coating), as well as the applicable provisions* of 40 CFR 63 Subpart A (General Provisions for 40 CFR 63 NESHAPs). The complete MACT standard is included as Attachment D, which is a part of this permit.

*An applicability reference table is included as an attachment to this permit (Attachment A). The table is based upon information provided in a request for additional information response letter from Solamatrix Inc., dated May, 3, 2010. Please be aware that operational changes may affect or alter the applicable provisions and in some cases, may require a construction permit.

[Rules 62-204.800(11)(b)67, F.A.C.; 40 CFR 63, Subpart JJJJ]

Excess Emissions

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision.}

A.8. Excess emissions resulting from startup, shutdown, or malfunction shall be permitted providing (1) Best operational practices to minimize emissions are adhered to and (2) The duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for a longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may be reasonably prevented during startup, shutdown, or malfunction shall be prohibited. In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rules 62-210.700(1), 62-210.700(4) and 62-210.700(6), F.A.C.]

Test Methods and Procedures

A.9. RTO Destruction Efficiency Test. ~~To demonstrate compliance with the VOC destruction requirements of Specific Condition No. A.6.b., the permittee shall test the RTO for VOC emissions annually between October 1 and September 30 (once per federal fiscal year).~~ 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 expiration date of this permit.
[Rules 62-4.070(3) and 62-296.503, F.A.C.; Construction Permit ~~1030119-010-AC~~ No. 1030119-015-AC]

A.10. Capture Efficiency. To demonstrate capture efficiency of the coating line enclosures, the permittee shall test the enclosures annually between October 1 and September 30 (once per federal fiscal year).
[Rules 62-4.070(3), 62-296.503 and 62-297.450, F.A.C.; Construction Permit No. 1030119-010-AC]

A.11. 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) and 62-297.620, F.A.C.]

A.12. Capture Efficiency. The permittee shall demonstrate the capture efficiency of the enclosure (for the coating lines) by one of the following methods:

a. Permanent Total Enclosure. Show the enclosures continue to meet the requirements given in EPA Method 204 for a Permanent Total Enclosure or

b. Capture Efficiency Test. Conduct a capture efficiency test for a temporary total enclosure pursuant to Rule 62-297.450, F.A.C.

[Rules 62-4.070(3), 62-296.503 and 62-297.450, F.A.C.]

A.13. Total Enclosure Modifications. A modification, as defined in Rule 62-210.200, F.A.C., or addition or replacement of air pollution control equipment, is prohibited without prior approval by the department, however if any other physical or operational change is made to the VOC capture system, the owner or operator shall notify the Air Permitting Section of the Department's Southwest District and the PCAQD of the change within 10 working days after making such change. If the change alters any of the total enclosure operating parameters documented in the most recent VOC emissions compliance tests approved by the PCAQD, the notification shall be accompanied by new Method 204 calculations which shows the total enclosure status is not altered. The Department may 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.

[Rules 62-210.200 (Definition of Modification), 62-210.300(1)(a), 62-297.450(4)(c) and 62-4.070(3), F.A.C.; Construction Permit No. 1030119-010-AC]

A.14. Operation During Testing. 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.1. (845 lb/hour, daily average), if feasible. This may be accomplished through coating line operation or use of the approved production simulation (Attachment B). Compliance tests submitted for rates less than 90% of maximum permitted rate shall automatically amend the permit to reflect the tested rate plus 10% as the currently permitted VOC loading rate. Once the unit is so limited, operation at a higher rate is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the authority to operate at the permitted capacity. (Clarification: When a unit is limited to a VOC loading rate of 110% of the test rate, the permittee may provide a 15-day notice of their intent to conduct an additional test. The notice may specify a 15-day period during which the unit will be allowed to operate at a higher rate for the purposes of testing.)
[Rules 62-297.310(2) and 62-4.070(3), F.A.C.; Construction Permit No. 1030119-010-AC]

A.15. Compliance Test Reports. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the PCAQD on the results of each such test. The required test report shall be filed with the PCAQD as soon as practical but no 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. 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 Coating Line Nos. 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 ~~1030119-010-AC No.~~ 1030119-015-AC]

A.16. Compliance Test Notification. At least 15 days prior to the date on which any compliance test is due to begin, the permittee shall provide written notification of the test to the PCAQD. 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 telephone number of the person conducting the test. The notification should also include the relevant emission unit number and test method(s).
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.17. Capture Efficiency Test Notification. The owner or operator of an affected activity, process, or emissions unit shall notify the PCAQD thirty (30) days prior to performing any capture efficiency and/or control efficiency tests.
[Rule 62-297.450(4)(d), F.A.C.]

Monitoring of Operations

A.18. RTO Minimum Operating Temperature. The RTO combustion chamber shall maintain a minimum operation temperature of 1400 degrees Fahrenheit at all times during coating operations.
[Rule 62-4.070(3), F.A.C. ; and Construction Permit No. 1030119-010-AC]

A.19. RTO Operating Data. The inlet and outlet temperatures across the RTO shall be measured continuously and recorded by a data logger.
[Rule 62-4.070(3), F.A.C.; and Construction Permit No. 1030119-010-AC]

Compliance Assurance Monitoring (CAM) Requirements

A.20. CAM Requirements. This emissions unit is subject to the 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; and, Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Recordkeeping and Reporting Requirements

A.21. Operation and Maintenance (O&M) Plan. The RTO shall be operated and maintained in accordance with the Operation and Maintenance (O&M) Plan included as Attachment C of this permit. This O&M Plan may be amended with the prior approval of the PCAQD. The O&M Plan documentation logs shall be maintained for a minimum of five years and shall be made available, for inspection by the Department and/or the PCAQD, upon request. At a minimum, the O&M Plan shall include (where applicable):

a. The operating parameters of the pollution control device.

b. Timetable for the routine maintenance of the pollution control device as specified by the manufacturer.

c. Timetable for routine periodic observations of the pollution control device sufficient to ensure proper operations.

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.
   4) Acceptable parameter ranges for each operational check

[Rule 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-128; Construction Permit No. 1030119-010-AC]

A.22. 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.1. 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.

~~7) The permittee shall maintain records of the hourly VOC input (daily avg.) to the RTO, in lbs/hr.~~

*{*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.1., 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 Construction Permit ~~1030119-010-AC~~ No. 1030119-015-AC]

A.23. Excess Emissions Recordkeeping. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of this facility which results in excess emissions; any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative. Records shall be maintained at the facility and be available for inspection by the Department upon request.
[Rules 62-4.070(3) and 62-210.700, F.A.C.]

A.24. Records Retention. All daily records required by this permit shall be completed within three business days and all monthly records shall be completed by the end of following month. All records required by this permit shall be maintained at the facility for at least five years, unless otherwise noted, and be made available to the Department upon request.
[Rules 62-4.070(3) & 62-213.440(1)(b)2.b., F.A.C.]