FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

DRAFT PERMITS

PERMITTEE

Hentzen Coatings, Inc.
3967 W. Mill Road
Milwaukee, WI 53218-1225

Authorized Representative:
Mr. Steven Hentzen, Vice President

Air Permit Nos.: 1030553-001-AC
1030553-002-AO
Permits Expire: 09/30/2013 (AC)
xx/xx/2018 (AO)
Initial Minor Air Construction and Operation Permits for Clearwater Facility

These are the final air construction and operation permits, in one document. Construction Permit No. 1030553-001-AC is the initial air construction permit for this powder coatings manufacturing facility (Standard Industrial Classification No. 3999), and Operation Permit No. 1030553-002-AO is the initial air operation permit for the facility located in Pinellas County at 5182 126th Avenue in Clearwater, Florida. The UTM coordinates are Zone 17, 332.32 N km East, and 3085.59.N km North. As noted in the Final Determination provided with these final permits, no changes or only minor changes and clarifications were made to the draft permits.

This final document is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, this document contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this document.

These air pollution permits are 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 these permits. 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 these final permits, 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 Permits 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 to the persons listed below.

Mr. Steven Hentzen, Vice President, Hentzen Coatings, Inc.
(llacroix@hentzen.com)

Mr. Larry Lacroix, Operations Manager, Hentzen Coatings, Inc.
(shentzen@hentzen.com)

Mr. Brad James, P.E., Trinity Consultants
(bjames@trinityconsultants.com)

Ms. Katherine Katsourides, Senior Consultant, Trinity Consultants
(bjames@trinityconsultants.com)

Mr. Gary Robbins, Environmental Program Administrator, Pinellas County Air Quality
(grobbins@co.pinellas.fl.us)

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

_____ _____
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility and Project Description, and Affected Emission Units

The construction permit project is the initial air construction permit for this existing facility, for which it has been determined that air permitting is required. This document is also the initial air operation permit for this facility. This existing facility manufactures high performance powder coatings for architectural, marine, aerospace, and industrial use. The facility processes raw material powder coating components that are shipped to the facility in bags. These raw materials consist of resins, fillers, crosslinkers, pigments, dyes, and various additives. Some of these materials include metal hazardous air pollutant (HAP) components. The powdered raw materials are sent to a mixer where various components are combined. The powdered output from the mixers is sent to one of four (4) electric extruders, where the powdered components are melted, mixed, and discharged. The coatings come out of the extruders as brittle solid sheets. The sheets are then mechanically broken in one of four (4) electric chippers and the chipped material is placed into totes or drums. The chips are then ground to a powder in one of three (3) mills and transferred off-site as final product. Each mill exhaust is controlled by a baghouse dust collector to control particulate matter (PM/PM10) emissions. These three (3) baghouses each exhaust outside the building.

Two other baghouses are also present at the facility. The first baghouse is a dust collector associated with the plastic (melanine) grit blaster that is used to clean the extruder equipment. This grit blaster dust collector is located inside the facility building and vents inside the building. The second baghouse is a dust collector associated with the plant air ventilation system. This system picks up air from various transfer points (layup, weighing area, etc.), sends it through the air ventilation system dust collector, and the cleaned air is recirculated back into the building. This air ventilation system dust collector is located inside the facility building and vents inside the building.

This project will create the following emissions units at this existing facility.

Facility ID No. 1030553

EU ID No.	Emission Unit Description
001	Mill No. 1 (w/baghouse dust collector emissions control device)
002	Mill No. 2 (w/baghouse dust collector emissions control device)
003	Mill No. 3 (w/baghouse dust collector emissions control device)
004	Grit Blaster (w/baghouse dust collector emissions control device)
005	Plant Air Ventilation System (w/baghouse dust collector emissions control device)

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

Exempt Emission Units/Activities

Emission activities which take place inside the production building, including raw material mixing, extruding, chipping, and material transfer, and do not emit directly to the atmosphere, are exempt from permitting in accordance with the provisions of Rule 62-4.040(1)(b), F.A.C. (insignificant impact)*.

* Note - Exemptions under Rule 62-4.040(1)(b), F.A.C., may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

FACILITY REGULATORY CLASSIFICATION

- The facility is not 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 not 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.
- This facility is a synthetic non-Title V source for the pollutants particulate matter less than 10 microns (PM10) and hazardous air pollutants (HAPs). The PM emission limitations and use of required emission control devices will ensure that the facility's PM10 and HAP emissions will be below the threshold for a Title V source (all PM emissions are considered to be PM10.)

*(**Federal Rule Applicability Note** - This facility is subject to NESHAP 40 CFR 63 Subpart CCCCCCC (7C) – National Emission Standard for Area Sources: Paints and Allied Products Manufacturing because Hentzen Coatings, Inc. manufactures coatings that contain HAPs specified in Subpart CCCCCCC 40 CFR 63.11607. However, this NESHAP has not been adopted by Florida in Rule 62-204.800(11)(b), F.A.C., and therefore its requirements are not included in these Florida DEP air permits.)*

PERMIT HISTORY/AFFECTED PERMITS

These permits are the first air construction and operation permits for this existing facility.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
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 Pinellas County Air Quality Division (PAQD). The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
509 East Avenue South, Suite 138
Clearwater, Florida -33756
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. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to the Pinellas County Air Quality Division (Compliance Authority) no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

c. copies of the most recent visible emissions (VE) compliance test reports required by Specific Condition Nos. A.5. and A.8., if not previously submitted;

d. any proposed revisions to the most recently approved emission control device O & M Plans *(see Specific Condition No. A.9. and B.3)*.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. EU Nos. 001, 002 and 003 – Mill Nos. 1, 2 and 3

This section of the permit addresses the following emissions units (EUs).

EU ID No.	Emission Unit Description
001	Mill No. 1 (w/baghouse dust collector emissions control device) - Coating chips from the electric chippers are ground to a powder in one of three (3) mills (Mill Nos. 1, 2, and 3). The exhaust from Mill No. 1 is controlled by a baghouse dust collector to control particulate matter (PM) emissions. The Mill 1 Dust Collector is an IAP Model 45-57HPCL80ARR9FR baghouse with a design rated air flow capacity of 3,000 scfm. This dust collector is located outside on the south side of the production building and exhausts outside the building to the atmosphere.
002	Mill No. 2 (w/baghouse dust collector emissions control device) - Coating chips from the electric chippers are ground to a powder in one of three (3) mills (Mill Nos. 1, 2, and 3). The exhaust from Mill No. 2 is controlled by a baghouse dust collector to control particulate matter (PM) emissions. The Mill 2 Dust Collector is a Buffalo Forge Size 4 Type RE baghouse with a design rated air flow capacity of 1,500 scfm. This dust collector is located outside on the south side of the production building and exhausts outside the building to the atmosphere.
003	Mill No. 3 (w/baghouse dust collector emissions control device) - Coating chips from the electric chippers are ground to a powder in one of three (3) mills (Mill Nos. 1, 2, and 3). The exhaust from Mill No. 3 is controlled by a baghouse dust collector to control particulate matter (PM) emissions. The Mill 3 Dust Collector has a design rated air flow capacity of 500 scfm (unknown manufacturer and model number). This dust collector is located inside the production building but exhausts outside the south side of the building to the atmosphere.

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation - The hours of operation of these emission units are not limited (i.e., permitted for 8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (Definition of Potential to Emit), F.A.C.; as requested by applicant in permit application submitted 04/17/13]

A.2. Circumvention of Emission Control Equipment - The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. The associated mill dust collector baghouse must be in service and operating properly at all times that the mill is in operation. *(See also Specific Condition No. A.9. for O & M Plan requirements for the mill baghouse dust collectors.)*
[Rule 62-210.650, F.A.C.]

EMISSIONS STANDARDS

A.3. Particulate Matter Emissions Limitations – Particulate matter (PM/PM10) emissions from each of the mill dust collector exhaust vents shall not exceed the emissions rates shown below.

Emission Unit ID and Description	Maximum PM/PM10 Emissions Rate*
EU No. 001 – Mill No. 1 w/baghouse dust collector	0.51 pounds/hour
EU No. 002 – Mill No. 2 w/baghouse dust collector	0.26 pounds/hour
EU No. 003 – Mill No. 3 w/baghouse dust collector	0.09 pounds/hour

*(*PM/PM10 Emission Limitation Permitting Note - The above PM/PM10 emissions limits were established for each of the mills based on baghouse dust collector manufacture guaranteed outlet grain loading concentration of 0.02 gr/dscf and baghouse dust collector design maximum air flow rates.)*

(Process Weight Table Rule Applicability Note – These emissions units are subject to Rule 62-296.320(4)(a)2., F.A.C. (process weight table) since they produce a finished product through a physical change (grinding) in the materials being processed. The PM/PM10 limits established by this condition are significantly lower (more stringent) than the applicable process weight table PM limitations and therefore satisfy the requirements of this rule.)

[Rules 62-4.070(3), 62-210.200 (definition of Potential to Emit), and 296.320(4)(a)2., F.A.C.; Permit Application submitted 04/17/13]

A.4. Mill Dust Collector Visible Emission (VE) Limitations - Due to the expense and complexity of conducting a stack test on a minor source of particulate matter, and because these sources are equipped with baghouse dust collector emissions control devices, the Department, in accordance with the authority granted under Rule 62-297.620(4), F.A.C., hereby establishes a visible emissions (VE) limitation for each of the mill dust collector exhaust vents not to exceed an opacity of 5% in lieu of a particulate matter (PM/PM10) stack test to show compliance with the PM/PM10 emission limitation of Specific Condition No. A.3.
[Rules 62-210.650 (Circumvention), and 62-297.620(4), F.A.C.]

COMPLIANCE TESTING REQUIREMENTS

A.5. Visible Emissions Compliance Tests - During each federal fiscal year (October 1st to September 30th), the exhaust vent of each of the mill baghouse dust collectors (EU Nos. 001, 002 and 003) shall be tested for visible emissions (VE) to demonstrate compliance with the emissions standard of Specific Condition No. A.4.
[Rule 62-297.310, F.A.C.]

A.6. Compliance Test Requirements - Compliance 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.7. Compliance Test Method - Required visible emissions compliance tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources - Visible emissions testing shall be a minimum of 30 minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur and be representative of normal operation of the mill being tested.

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other method may be used unless prior written approval is received from the Department.
[Rules 62-204.800, and 297.310(4)(a)2., F.A.C.; and Appendix A of 40 CFR 60]

REPORTING REQUIREMENTS

A.8. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. The estimated mill operating rate (in tons/hour or pounds/hour) during the test period shall be submitted with the test report.
[Rule 62-297.310(8), F.A.C.]

OTHER REQUIREMENTS

A.9. Operation and Maintenance (O & M) Plan for Particulate Matter (PM/PM10) Control Devices - For air pollution control devices and collection systems, the permittee shall maintain and implement an O & M Plan to include a schedule for the maintenance and inspection of each control device, collection system, and auxiliary equipment. The plan must specify specific timelines for all maintenance and observations and must include an O&M log that includes the checks from the O&M Plan, along with the frequencies, parameter limits, observations, etc. (see Item e. below). The permittee shall submit an Operation and Maintenance Plan (O & M Plan) for each of the three (3) mill baghouse dust collectors **within 60 days of issuance of this permit**. The plan may be revised with the prior approval from the PCAQD. The O&M Plan documentation shall be retained at the facility and made available to the Department and PCAQD upon request. At a minimum, the O&M Plan shall include:

a. The operating parameters of the pollution control device.

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

c. Time table of routine daily, weekly, bi-weekly, or monthly observations and inspections of the pollution control device.

d. A list of the type and quantity of the required spare parts for the pollution control device which are stored on the premises.

e. A maintenance log which will indicate, as 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.

[Pinellas County Code, Section 58-128]

This section of the permit addresses the following emissions unit/units (EUs).

EU ID No.	Emission Unit Description
004	Grit Blaster (w/baghouse dust collector emissions control device) – A plastic (melanine) grit blaster is used to clean the extruder equipment. Particulate matter (PM) missions from the Zero Products Abrasive Blaster Model No. 1642 grit blaster are controlled by a baghouse dust collector, which has a manufacturer's maximum design air flow rate of approximately 1,800 scfm. This grit blaster dust collector is located inside the facility building and vents inside the building.
005	Plant Air Ventilation System (w/baghouse dust collector emissions control device) – The plant air ventilation system picks up air from various transfer points (layup, weighing area, etc.), sends it through a dust collector to control particulate matter (PM) emissions and the cleaned air is recirculated back into the building. This dust collector is a FARR TENKAY Size IZD baghouse dust collector, with a manufacturer's maximum design air flow rate of 8,500 scfm. This air ventilation system dust collector is located inside the facility building and vents inside the building.

PERFORMANCE RESTRICTIONS

B.1. Hours of Operation - The hours of operation of these emission units are not limited (i.e., permitted for 8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (Definition of Potential to Emit), F.A.C.; as requested by applicant in permit application submitted 04/17/13]

B.2. Circumvention of Emission Control Equipment - The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. The Grit Blaster baghouse dust collector must be in service and operating properly at all times that the Grit Blaster is in operation. The Plant Air Ventilation System baghouse dust collector must be in service and operating properly at all times that any part of the plant is in operation. As an indicator that the particulate control devices are operating properly, the Department has determined there should be no visible emissions (≤ 5% opacity) as determined by Method 22 from each emission control device or from the production building openings. Visible emissions are not considered a violation but an indicator of improper operation of the emission control equipment and may indicate a violation of Rule 62-210.650, F.A.C. (circumvention of emission control equipment), or the need for additional control of fugitive emissions from the building by the plant air ventilation system. *(See also Specific Condition No. B.3. for O & M Plan requirements for these baghouse dust collectors.)*
[Rules 62-4.070(3), 62-210.650, and 62-296.320(4)(c), F.A.C]

OTHER REQUIREMENTS

B.3. Operation and Maintenance (O & M) Plans for Particulate Matter (PM/PM10) Control Devices - For air pollution control devices and collection systems, the permittee shall maintain and implement an O & M Plan to include a schedule for the maintenance and inspection of each control device, collection system, and auxiliary equipment. The plans must specify specific timelines for all maintenance and observations and must include an O&M log that includes the checks from the O&M Plan, along with the frequencies, parameter limits, observations, etc. (see Item e. below). The permittee shall submit a separate Operation and Maintenance Plan (O & M Plan) for the Grit Blaster baghouse dust collector and for the Plant Air Ventilation System baghouse dust collector **within 60 days of issuance of this permit**. The plans may be revised with the prior approval from the PCAQD. The O&M Plan documentation shall be retained at the facility and made available to the Department and PCAQD upon request. At a minimum, the O&M Plans shall include:

a. The operating parameters of the pollution control device.

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

c. Time table of routine daily, weekly, bi-weekly, or monthly observations and inspections of the pollution control device.

d. A list of the type and quantity of the required spare parts for the pollution control device which are stored on the premises.

e. A maintenance log which will indicate, as 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.

[Pinellas County Code, Section 58-128]