Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
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Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

DSE, Inc.
5201 South Westshore Boulevard
Tampa, FL 33611

Air Permit No. 1050142-010-AO
Permit Expires: 06/10/2016
Site Name: GTI Systems, Inc.
Minor Air Operation Permit

Authorized Representative:
Mr. Eric Lewin, Facilities Coordinator

This is the final air operation permit, which authorizes operation of the steel grenade casings surface coating operations at the GTI Systems, Inc. facility (Standard Industrial Classification No. 3479) located in Polk County at 1250 Hobbs Road in Auburndale, Florida. The UTM coordinates are Zone 17, 423.08 km East, and 3102.83 km North.

This final permit 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

Because of 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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a

petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;
(b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of when and how the petitioner received notice of the agency decision;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

Cindy Zhang-Torres, P.E. Effective Date
Air Permitting Manager
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including 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 _____ to the persons listed below.

Mr. Eric Lewin, Facilities Coordinator, DSE. Inc.
(elewin@dse.net)

Mr. Kevin Golden, P.E., UNIVERSAL Solutions, Inc.
(kgolden@usienvironmental.com)

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.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility is a grenade casing surface coating facility which consists of the following emissions unit.

Facility ID No. 1050142	
ID No.	Emission Unit Description
007	Steel Grenade Casing Surface Coating Operations *(See Section 3 (Emission Unit Specific Conditions), Subsection A, for detailed description.)*

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 following emission units/activities are exempt from air permitting in accordance with Rule 62-210.300(3)(b)1, F.A.C. (Generic Emission Unit Exemption).

- Two (2) 0.3 MMBtu/hour natural gas fired drying ovens which are integral to the two paint lines (one for each paint line).
- In addition to the spray booth drying ovens, there are <u>two additional small natural gas fired ovens</u>. One is a <u>hydrogen embrittlement relief oven</u> used approximately once per week for 3 to 4 hours as necessary to heat-treat the parts and return the steel to its original condition. This oven has a heat input rating of 0.35 MMBtu/hour. The other is a <u>burn-off oven</u> used approximately every other day for 4-6 hours to remove accumulated dried paint from the screens and spindles. This oven has a heat input rating of 0.5 MMBtu/hour.
- There is also an <u>additional coating/treatment operation</u> at this facility. This is an <u>anodizing process</u> where aluminum portions of the grenade casings are treated. Heat for this process is supplied by electric heaters. Air emissions from this process are insignificant.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- 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 pollutant hazardous air pollutants (HAPs).

PERMIT HISTORY/AFFECTED PERMITS

This operation permit renewal replaces Operation Permit No. 1050142-008-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

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 Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

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. *(Permitting Note - See also Section 4. Appendix C (Common Conditions), Condition No. 11.c. for additional AOR requirements.)*
[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application - A completed application for renewal of the air operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an air operation permit, the applicant shall submit the following:

a. the appropriate air 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 two months of the required VOC, HAP and production records specified in Specific Condition No. A.7.

[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 No. 007 – Grenade Casing Surface Coating Operations

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
007	Steel Grenade Casing Surface Coating Operations The steel grenade surface coating operations include metal treatment, painting, drying and packaging. The metal treatment process is a chromate-free dip phosphate line with a series of dip tanks where the grenade casings are cleaned, rinsed, and coated with various solutions. After being dipped in the final (sealer) tank the parts are dried in two (2) electrically powered drying ovens. After the treatment process is completed, the casings are transferred to the painting area which consists of two (2) paint lines (M430 and 918 paint lines), each with a spray booth equipped with automatic spray guns, where primer and paint are applied to the steel casings which are loaded into individual rotational spindle stands. After surface coating, the casings are passed through 0.3 MMBtu/hour natural gas fired dry-off ovens which are integral to each paint line (one for each line). The M430 paint line has two (2) exhaust stacks from the paint booth and one stack from the associated drying oven. The M918 paint line has one (1) exhaust stack from the paint booth and one stack from the associated drying oven. Wire mesh screens and filters are utilized in the paint booths to collect paint overspray. The filters are replaced periodically and the screens removed and cleaned.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity – The maximum production rate of coated steel grenade casings shall not exceed 10,950,000 casings in any consecutive 12-month period.
[Rule 62-210.200, (Definition of Potential to Emit), F.A.C.; Construction Permit 1050142-009-AC]

A.2. Operating Hours - The hours of operation are not limited (i.e., permitted for 8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (Definition of Potential to Emit), F.A.C.; Construction Permit 1050142-009-AC]

EMISSIONS STANDARDS

A.3. VOC Emissions Limitation – Total emissions of volatile organic compounds (VOC) shall not exceed 24.9 tons per any consecutive 12-month period.
[Construction Permit 1050142-009-AC]

A.4. HAP Emissions Limitations – Emissions of Hazardous Air Pollutants (HAPs) shall not exceed 9.9 tons in any consecutive 12-month period of any individual HAP, nor 24.9 tons in any consecutive 12-month period of any combination of HAPs (i.e., total HAPs).
[Construction Permit 1050142-009-AC]

A.5. General Particulate Emission Limiting Standards: Unconfined Emissions of Particulate Matter (PM) - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include the use of filters and wire mesh screens to control paint spray booth overspray emissions. In order to provide reasonable assurance above precautions are adequately controlling emissions of unconfined particulate matter, visible emissions (VE) from the paint spray booths exhausts should not exceed 5 percent opacity. Exceedance of the 5% opacity VE limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary.
[Rules 62-4.070(3) & 62-296.320(4)(c), F.A.C.; Construction Permit 1050142-009-AC]

(Permitting Note - See also Section 4. Appendix C (Common Conditions), Condition No. 9. for additional unconfined PM emission requirements that apply facility-wide.)

A.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. The facility shall comply with the following:

a. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials.

b. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.

c. Tightly cover or close all VOC containers when they are not in use.

d. Prevent excessive air turbulence across exposed VOCs.

e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit 1050142-009-AC]

RECORDKEEPING REQUIREMENTS

A.7. VOC, HAP and Production Compliance Records - In order to demonstrate compliance with Specific Condition Nos. A.1., A.3., and A.4., the permittee shall maintain monthly records of VOC and HAP usage, and production of coated steel grenade casings. At a minimum the records shall contain the following:

a. month of record;

b. Amount and types of coatings and solvents used during the month (pounds);

(Note - At the option of the permittee, materials received may be recorded instead of materials used.)

c. VOC and HAP content of materials used (% by weight);

d. calculated VOC and individual HAP(s) emission for the month (lbs or tons/month) based on b. and c. above;

e. number of steel casings coated during the month; and

f. a calculation of the rolling consecutive 12-month period totals of the following:

1. total VOC emissions (tons VOC/consecutive 12-month period);
2. individual HAP emissions (tons individual HAP/consecutive 12-month period);
3. total HAP emissions (tons of total HAPs/consecutive 12-month period); and
4. coated steel grenade casing production (i.e., steel grenade casings coated/consecutive 12-month period).

All recordkeeping information required by this permit shall be updated at least monthly, with each entry made no later than the end of the month following the month of record. Supporting documentation ("As Supplied", "As Applied" sheets, MSD (Material Safety Data) sheets, EPA data sheets, purchase orders, etc.) shall be kept for each coating, solvent and VOC/HAP containing material utilized at the facility. All of the above records shall be maintained at the facility. *(Permitting Note - See also Section 4. Appendix C (Common Conditions), Condition No. 10. for additional record retention requirements.)*
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050142-009-AC]