Title V Air Operation Permit Renewal
Permit No. 1050158-006-AV

APPLICANT

The applicant for this project is High Performance Systems, Inc. The applicant's responsible official and mailing address are: Mr. John Taylor, Executive Vice President, High Performance Systems, Inc. Winter Haven Facility, 1201 American Superior Boulevard, Winter Haven, Florida 33884.

FACILITY DESCRIPTION

The applicant operates the Winter Haven Facility, which is located in Polk County at 1201 American Superior Boulevard, Winter Haven.

This facility consists of a conveyorized extruded aluminum metal finishing plant with three (3) emission units. The emission units are:

- EU No. 001 – Conveyor Paint Line (Booth Nos. 1 – 4), Touch-Up Spray Booth (Booth No. 5), and Paint Mix Room
- EU No. 002 – Paint Bake Oven w/afterburner and Tank No. 3 Heater
- EU No. 003 – Paint Stripping Furnace

The painting operations/activities associated with Emission Unit No. 001 are subject to the Maximum Achievable Control Technology (MACT) standards of 40 CFR 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, which is adopted and incorporated by reference in Rule 62-204.800(11), F.A.C.

Once painted, the metal moves through a paint bake oven to cure the paint to manufacturer's specifications.

The paint bake oven's afterburner has a circular chart recorder to continuously monitor and record the operating temperature.

Paint accumulated on hooks, which are used to hang the metal, are periodically removed in the paint stripping furnace.

The paint stripping furnace and paint bake oven each have a temperature controller.

Natural gas is the primary fuel with propane as a back-up during times of natural gas curtailment.

Volatile organic compound (VOC) emissions from Emission Unit No. 001, including paint spray booths, touch-up booth, paint mix room, and use of cleanup solvents shall not exceed 193.4 pounds/hour (monthly average basis) and 240.0 tons for any consecutive 12-month period. VOC emission compliance for these limitations is demonstrated by monthly recordkeeping. Although the permit requires the use and proper operation of the paint bake oven's afterburner, no credit is taken in the permit for the destruction of volatile organic compounds.

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

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit and incorporate the terms and conditions of Construction Permit No. 1050158-007-AC for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Title V Air Operation Permit Renewal No. 1050158-005-AV issued September 9, 2007
Application for a Title V Air Operation Permit Renewal received January 27, 2012
Notice of Intent to Issue Air Permit issued **[Month day, year]**
Public Notice Published **[Month day, year]**

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 an emissions unit subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

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) does not apply to any of the emissions units at the facility, since the facility is taking no credit for any emission control efficiency.

PROJECT REVIEW

This Title V air operation permit renewal changes the previous Title V air operation permit by applying new templates and incorporating the terms and conditions of Construction Permit No. 1050158-007-AC, which modifies Construction Permit No. 1050158-001-AC. The changes:

1. Clarify the allowable VOC emission limitations are for Emission Unit No. 001 verses the entire facility. This change is necessary since Specific Condition No. 16 of Construction Permit No. 1050158-001-AC only requires recordkeeping for the activities associated with Emission Unit No. 001 to demonstrate compliance with the VOC emission limitations.

2. Modify the visible emission standards for Emission Unit Nos. 002 and 003. This change is necessary since the batch bake-off incinerator (paint stripping furnace) and paint bake oven's afterburner are not considered "incinerators".

3. Delete the regularly scheduled visible emission testing requirements. This change is necessary, since all the activities at this facility are only subject to general visible emissions in requirements of Rule 62-296.320(4)(b), F.A.C.

4. Change the dry-off oven from a regulated activity, which is part of Emission Unit No. 002, to an insignificant activity. Change the dry-off oven from a regulated activity, which is part of Emission Unit No. 002, to an insignificant activity. This change is necessary since the dry-off oven's emissions are: 1) below the insignificant criteria in Rule 62-213.430(6)(b), F.A.C.; 2) below the exemption criteria in Rule 62-210.300(b)1., F.A.C.; and 3) the oven is used before the volatile organic emissions from painting activities occur.

5. Establish the Paint Bake Oven's afterburner shall be operating whenever the oven is operating. This change is necessary since Specific Condition No. 6 in Construction Permit No. 1050158-001-AC requires the afterburner to be operated "whenever possible" the Paint Bake Oven is in operation and Specific Condition No. A.6. in Title V Permit No. 1050158-005-AV requires the afterburner to be operated "whenever" the Paint Bake Oven is in operation.

CONCLUSION

This project renews Title V Air Operation Permit No. 1050158-005-AV, which was issued on 09/09/2007 and incorporates the terms and conditions of Construction Permit No. 1050158-007-AC, which was issued on 03/09/2012. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.