

SWD INTERNAL PERMITTING MEMORANDUM

TO: Robert C. Wong
District Air Program Administrator

THRU: Cindy Zhang-Torres, P.E.
Air Permitting Manager

FROM: Jim McDonald
Air Permitting Engineer

DATE: February 7, 2012

SUBJECT: Draft Permit No. 1050158-007-AC
Draft/Proposed Permit No. 1050158-006-AV
Facility Name: High Performance Systems, Inc.

Day 90: April 26, 2012

From the information below, I recommend the Intent to Issue for High Performance Systems, Inc. be signed.

On January 27, 2012, High Performance Systems, Inc. submitted an air pollution application to renew Title V Permit No. 1050158-005-AV for their Winter Haven Facility located in Polk County at 1201 American Superior Boulevard, Winter Haven. The 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 M - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

Review of the renewal application and the current Title V permit 1050158-005-AV revealed the following changes to Construction Permit No. 1050158-001-AC are necessary:

1. Clarify the allowable VOC emission limitations are for Emission Unit No. 001 versus 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. 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.

These changes are addressed in Construction Permit No. 1050158-007-AC.

This memorandum serves as a Technical Evaluation, since the changes do not result in any changes to actual and/or potential emissions.

Compliance with the maximum allowable VOC emission limitations of 193.4 pounds/hour (monthly average basis) and 240.0 tons for any consecutive 12-month period are demonstrated by monthly recordkeeping.

There are no engines at the facility. Thus, the federal requirements for reciprocating internal combustion engines (RICE) are not applicable.

Nedin Bahtic inspected the facility on August 3, 2011, and determined the facility was in full compliance.