Title V Air Operation Permit Revision
Industrial Container Services – Lakeland, LLC
FINAL Permit No. 1050208-016-AV

APPLICANT

The applicant for this project is Industrial Container Services – Lakeland, LLC. The applicant's responsible official and mailing address are: Mr. David Swanbeck, Industrial Container Services – Lakeland, LLC, P.O. Box 2006, Auburndale, FL 33823.

FACILITY DESCRIPTION

The applicant operates the Industrial Container Services – Lakeland, LLC, which is located at 2006 Thornhill Road, Auburndale, FL 33823

Industrial Container Services operates a metal-drum-refinishing facility. A metal-drum-reconditioning furnace is used to remove existing paint and residual material from used drums prior to cleaning and coating. The products of incomplete combustion generated by the pyrolysis process in the primary chamber are controlled in the secondary chamber by a direct-flame afterburner fired with natural gas. The secondary chamber provides a one-second-residence time at 1450° F. Drums and lids are cleaned of remaining residue by shotblast machines. After shotblasting, the drum interiors and exteriors are sprayed with coatings in an automated paint-spray booth. Once coating is complete, the drums are dried in a natural-gas-fired drum-drying oven. Drum lids are coated in one of two paint-spray booths, and then dried in a natural-gas-fired dryer. Cleaning solvents are used throughout the facility primarily for cleaning paint-spray guns. All paint spray booths are equipped with filter systems to control overspray emissions. CAM does not apply, since there is no VOC control device associated with the painting operation.

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

Surface coating operations at this facility are subject to the applicable requirements of 40 CFR 63 Subpart MMMM - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Surface Coating of Miscellaneous Metal Parts and Products.

The drum reconditioning furnace and two drying ovens at this facility are not subject to 40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters. They do not meet the definition of process heaters contained in 40 CFR 63.7575 (combustion gas does come into direct contact with process materials).

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility to incorporate terms and conditions of Construction Permit 1050208-015-AC.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit 1050208-012-AV issued August 8, 2008
Title V Air Construction Permit 1050208-015-AC issued April 12, 2010
Application for a Title V Air Operation Permit Revision dated January 3, 2011
Additional Information Request dated January 28, 2011
Additional Information Response received March 22, 2011
Notice of Intent to Issue Air Permit issued May 13, 2011
Public Notice Published May 20, 2011

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 units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units 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 units at the facility.

PROJECT REVIEW

The subject of the permit is for the revision of the Title V Air Operation Permit to incorporate the modification included in Construction Permit No. 1050208-015-AC.

The construction permit included the following modifications: (1) the replacement of the existing drum reconditioning furnace secondary (afterburner) chamber; and (2) removal of the visible emissions limitation, and the associated compliance testing requirements from the drum furnace exhaust.

Also as part of this revision Appendix Subpart A – 40 CFR Subpart A was added to the appendices.

CONCLUSION

This project revises Title V Air Operation Permit No. 1050208-012-AV, which was issued on August 24, 2008. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.