American Environmental Container Corporation
Lakeland Facility

Facility ID No. 1050250
Polk County

Title V Air Operation Permit Renewal

Permit No. 1050250-009-AV
(Renewal of Title V Air Operation Permit No. 1050250-008-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 632-7600
Fax: (813) 632-7668

Compliance Authority:

State of Florida
Department of Environmental Protection
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DRAFT/PROPOSED PERMIT

PERMITTEE:
American Environmental Container Corporation
2302 Lasso Lane
Lakeland, Florida33801

Permit No. 1050250-009-AV
Lakeland Facility
Facility ID No. 1050250
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Lakeland Facility is located in Polk County at 2302 Lasso Lane, Lakeland, Florida. UTM Coordinates are: Zone 17, 413.67 East and 3099.47 North. Latitude is: 28°01'03" North; and, Longitude is: 81°52'41" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE, 2011
Renewal Application Due Date: Exp. DATE -225, 2016
Expiration Date: Eff. DATE + 5 years, 2016

Draft/Proposed

_____

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

CZ/jm/pp

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

The facility is a reinforced plastic composites production facility that produces swimming pools, spas, and other associated items. Production operations occur in two (2) buildings identified as the Lamination Building (south) and the Metal Shop/Offices/Tooling/Mold Preparation Building (north).

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
002	Reinforced Plastic Composites Production Facility and Associated Activities

Subsection C. Applicable Regulations.

Based on the renewal application received May 10, 2011, this facility is a major source of hazardous air pollutants (HAP) and a synthetic non-PSD major source for the pollutant volatile organic compounds (VOC). A summary of applicable regulations is shown in the following table.

Regulation	EU Nos.
40 CFR 63, Subpart A, General Provisions	002
40 CFR 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production	002
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	All

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. The doors and windows shall be closed whenever feasible to ensure that VOC emissions from the materials containing VOC's are captured and exhausted through the stacks with adequate dispersion to prevent objectionable odors. If the Department receives a valid odor complaint, the Department reserves the right to require additional odor control measures/work practices be implemented.
[Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General 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 or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.

a. Fans and ventilation systems, as described below, located in the reinforced lamination building shall be operating whenever usage of material containing VOC/OS occurs and shall remain operating for at least one (1) hour after the usage has been completed. The bays are exhausted through six (6) identical 48-inch diameter, 35,000 cfm (rated) fans discharging 36 feet AGL (above ground level). Each fan controls ventilation from two (2) adjacent bays. The VOC collection points are located in sub floor troughs to aid in capturing the heavier than air VOC/HAP specimens generated. Six (6) 30,000 acfm forced intake fans assure positive air flow in the building.

b. All materials containing VOC/OS's shall be stored in closed containers and/or in small automatic closing safety cans.

c. Clean-up solvent washings shall be directed into containers that prevent evaporation into the atmosphere.

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

e. Immediately attend to all spills of materials containing VOC/OS's as appropriate.

[Rule 62-296.320(1), F.A..C.; Construction Permit No. 1050250-007-AC]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as buffing, polishing, carving, cutting, drilling, routing, sanding, sawing, trimming, machining, surface grinding, turning, loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Paved parking and trafficked areas shall be maintained and kept free of particulate matter build-up.

b. Proper disposal of wastes (e.g., saw dust, pipe cutting, etc.) in an industrial dumpster.

c. Sprinkling with water shall be used as necessary on paved and unpaved areas and in the dumpster.

d. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particular matter.

In order to provide reasonable assurance the adequate measures are being taken to control fugitive emissions, visible emissions from any building opening, vent or stack should not exceed 5% opacity. Opacity in excess of this level will not be considered as a violation in and of itself, but shall be an indication that additional control precautions and/or practices beyond those in the place may be necessary. [Rules 62-296.320(4)(c) and 62-4.070(3), F.A.C.; Construction Permit No. 1050250-007-AC]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.
[Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm.
[Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

Subsection A. Emissions Unit No. 002

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
002	Reinforced Plastic Composites Production Facility and Associated Activities: The Lamination Building (south) is approximately 180' x 100' x 25' high and is divided inside into six (6) dual lamination bays. The Metal Shop/Offices/Tooling/Mold Preparation Building (north) is used for offices, storage, potential mold care, and other minor activities. The operation involves the production of styrene based fiberglass swimming pools, spas, and related items that include the preparation and repair of molds, the application of resin and gel coat to molds using spray guns, product assembly, touchup, equipment cleanup, and fugitive emissions from Lamination Building. The primary source of emissions is the resin/gelcoat application process using mechanical (non-atomized/atomized) spray. The main pollutant of concern is styrene emissions during spraying on the open molds. All the styrene emissions are fugitive in nature from various work areas inside the Lamination Building. The bays are exhausted through six (6) identical 48-inch diameter, 35,000 cfm, (rated) fans discharging 36 feet AGL (above ground level). Each fan controls ventilation from two (2) adjacent bays. The VOC collection points are located in sub floor troughs to aid in capturing the heavier than air VOC/HAP specimens generated. Six (6) 30,000 acfm forced intake fans assure positive air flow in the building. The Lamination Building's ventilation system is used to improve the dispersion of styrene emissions into the atmosphere to avoid and/or minimize odor impacts off-site. This emission unit is subject to the requirements of 40 CFR 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.2. Total Hazardous Air Pollutants (THAPs) Emissions.

a. THAPs emissions from this emission unit shall not exceed 180.0 tons in any consecutive 12-month period.

b. THAPs emissions from "small" parts are restricted such that these "small" parts may not emit 100.0 tons or more in any consecutive 12- month period.

[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050250-007-AC]

A.3. Total Volatile Organic Compounds (VOCs) Emissions. TVOCs emissions from this emission unit, including styrene and other HAPs that are VOCs, shall not exceed 180.0 tons in any consecutive 12-month period.
[Rule Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 1050250-007-AC]

Recordkeeping and Reporting Requirements

A.4. Recordkeeping Requirements. The permittee shall keep monthly logs for this emission unit to document compliance with the emission limitations of Specific Conditions A.2. and A.3. Note, if any month results in THAPs and/or TVOCs emissions being within 10% of its associated allowable emission limit for the prior consecutive 12-month period, the monthly log(s) required below shall be then kept daily. The logs shall identify and quantify each resin, coating, solvent, chemical, etc. "used" at the facility that contains HAPs and/or VOCs, per application method. Usage logs of materials other than gel coats and resins may be based on the beginning and ending inventories, deliveries, shipments, etc. Additionally, when daily records for materials other than gel coats and resins are not required to be kept, monthly usage of these materials may be based upon purchases, provided no materials are used which are not purchased. The daily logs shall include a cumulative consecutive 12-month total to demonstrate compliance with the applicable emission limitation in Specific Conditions A.2. and A.3. The monthly logs shall be completed by the end of the next month. Daily logs (if required) shall be completed within five (5) business days. Supporting documentation (MSD sheets, purchase orders, emission factors, etc.) shall be kept for each material, which includes sufficient information to determine THAP emissions and TVOC emissions. The logs and supporting documents shall be retained on file at the facility for a minimum of the most recent five (5) year period and made available to the Department upon request. The monthly logs shall include at least the following information:

a. Facility Name, Facility ID No., Emission Unit No. (EU No. 002), and Description.

b. Month, year, and method used for records (usage, inventory, purchases)

c. Record the monthly quantity, in tons, of each material used that contains HAPs/VOCs (resin, gel coat, catalyst, foam, cleaning solvents, and miscellaneous materials, etc.) per each application method.

d. Calculate and record the most recent consecutive 12-month period cumulative material usage rate (in tons per 12-consecutive month period) (resin, gel coat, catalyst, foam, cleaning solvents, and miscellaneous materials, etc.)

e. For each material/product used that contains HAP/VOC, record the percentage (%) by weight of HAP along with the percentage (%) by weight of VOC.

f. Record the monthly and the most recent consecutive 12-month total quantity, in tons, for each individual HAP emissions per application method and material. Record each individual HAP emission factor in units of pounds per ton of resin/gel coat applied for each method of operation. Be sure, when applicable, to also identify emissions from "small" parts.

g. Record the monthly and the most recent consecutive 12-month total quantity, in tons, of THAPs emissions.

h. Record the monthly and the most recent consecutive 12-month total quantity, in tons, of VOC emissions per application method and material.

i. Record the monthly and the most recent consecutive 12-month total quantity, in tons, of TVOCs emissions.

j. Documentation of the HAP emission calculations shall be determined by using the emission factors in Table 1 of 40 CFR 63, Subpart WWWW and/or from the Unified Emission Factors for Open Molding of Composites table dated July 23, 2001 (see attached Appendix NESHAP, 40 CFR 63, Subpart WWWW and Appendix UEF Table). The current calculations shall use the formula:

$Emissions_{HAP}$ tons = ((χ tons of resin or gel coat) x (EF* lb/ton))/2000 lbs./ton

*EF = the appropriate emission factor from 40 CFR 63, Subpart WWWW, Table 1 (see attachment) and/or from the Unified Emission Factors for Open Molding of Composites table dated July 23, 2001 (see attached Appendix NESHAP, 40 CFR 63, Subpart WWWW and Appendix UEF Table).

HAP emission limits for open for open molding sources must meet the emission limits in Table 3 to Subpart WWWW.

Documentation of VOC emissions shall be determined by appropriate emission factors.

k. Each log shall have appropriate footnotes listing emission factors or other methods used in the calculation.

l. Each log, where applicable, shall have attached the documentation for all chemicals removed from the facility if the permittee seeks emission credits for the wastes.

m. The emission factors used to calculate HAP and VOC emissions for the logs shall be updated upon receiving more accurate emission data, such as updates to Subpart WWWW, UEF Table, AP-42, or other references or methods approved by the Department prior to using.

n. Record product size as "small" to document production of "small" parts only. The definition of "small" part as intended in Subpart WWWW is, "*A small open molding part is defined as a part that, when the final finished part is enclosed in the smallest rectangular six-sided box into which the part can fit, the total interior volume of the box does not exceed 250 cubic feet, or any interior sides of the box does not exceed 50 square feet.*"

o. Record the monthly and the most recent 12-month total quantity, in tons, for THAPs emissions from "small" parts.

[Rule 62-4.070(3), F.A.C.; 40 CFR 60, Subpart WWWW, Section 63.5805(d)(2)(ii); Construction Permit No. 1050250-007-AC]

A.5. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]

Other Requirements

A.6. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in the following list, which are attached to and made a part of this permit:

a. Appendix NESHAP, 40 CFR 63, Subpart A – General Provisions

b. Appendix NESHAP, 40 CFR 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

The applicable requirements for 40 CFR 63, Subpart WWWW are shown below based on the permittee's revised application submitted July 12, 2011. Any changes in operation may change the applicable requirements and may require additional permitting action(s) prior to implementing the change.

(Note: Entire section applies unless otherwise noted with specific applicable subsection references shown below the section caption.)

What This Subpart Covers
§**63.5780** What is the purpose of this subpart?
§**63.5785** Am I subject to this?
§**63.5790** What parts of my plant does this subpart cover?
§**63.5795** How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?

Calculating Organic HAP Emissions Factors for Open Molding and Centrifugal Casting
§**63.5796** What are the organic HAP emissions factor equations in Table 1 to this subpart and how are they used in this subpart?
§**63.5797** How do I determine the organic HAP content of my resins and gel coats?
§**63.5798** What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?
§**63.5799** How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of §63.5805 apply?
§63.5799(b) and (c)

Compliance Dates and Standards
§**63.5800** When do I have to comply with this subpart?
§**63.5805** What standards must I meet to comply with this subpart?
§63.5805(b) and (g)

Options for Meeting Standards
§**63.5810** What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

General Compliance Requirements
§**63.5835** What are my general requirements for complying with this subpart?
§63.5835(a) and (c)

Testing and Initial Compliance Requirements
§**63.5840** By what date must I conduct a performance test or other initial compliance demonstration?
§**63.5860** How do I demonstrate initial compliance with the standards?
§63.5860(a)

Emissions Factor, Percent Reduction, and Capture Efficiency Calculation Procedures for Continuous Lamination/Casting Operations
(sections not applicable)

Continuous Compliance Requirements
§**63.5895** How do I monitor and collect data to demonstrate continuous compliance?
§**63.5895(c)**
§**63.5900** How do I demonstrate continuous compliance with the standards?
§**63.5900(a)(2) through (4)**
§**63.5900(b)**
§**63.5900(c)** *(as it relates to malfunctions)*

Notifications, Reports, and Records
§**63.5905** What notifications must I submit and when?
§**63.5910** What reports must I submit and when?
§**63.5910(a) through (c)(5)**
§63.5910(d)
§635910(f) through (i)
§**63.5915** What records must I keep?
§**63.5915(a), (c), and (d)**
§**63.5920** In what form and how long must I keep my records?

Other Requirements and Information
§**63.5925** What parts of the General Provisions apply to me?
§**63.5930** Who implements and enforces this subpart?
§**63.5935** What definitions apply to this subpart?

Tables to Subpart WWWW of Part 63
Table 1 to Subpart WWWW of Part 63 - Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams
Table 2 to Subpart WWWW of Part 63 - Compliance Dates for New and Existing Reinforced Plastic Composites Facilities
Table 3 to Subpart WWWW of Part 63 - Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources That Emit Less Than 100 TPY of HAP
Table 4 to Subpart WWWW of Part 63 - Work Practice Standards
Table 7 to Subpart WWWW of Part 63 - Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type
Table 8 to Subpart WWWW of Part 63 - Initial Compliance With Organic HAP Emissions Limits
Table 9 to Subpart WWWW of Part 63 - Initial Compliance With Work Practice Standards.
Table 13 to Subpart WWWW of Part 63 – Applicability and Timing of Notifications
Table 14 to Subpart WWWW of Part 63 - Requirements for Reports
Table 15 to Subpart WWWW of Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63

[Rules 62-204.800(11) and 62-213.440, F.A.C.; 40 CFR 63, Subpart WWWW (71 FR 20466 - Federal Register Revision date April 20, 2006)]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

- Appendix A, Glossary.
- Appendix I, List of Insignificant Emissions Units and/or Activities.
- Appendix NESHAP, 40 CFR 63, Subpart A – General Provisions.
- Appendix NESHAP, 40 CFR 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.
- Appendix RR, Facility-wide Reporting Requirements.
- Appendix TV, Title V General Conditions.
- Appendix UEF (Unified Emission Factors for Open Molding of Composites) Table (version 6/23/01)

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

- Statement of Basis.
- Table H, Permit History.