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

APPLICANT

The applicant for this project is the American Environmental Container Corporation. The applicant's responsible official and mailing address are: Mr. Kirk Sullivan, President, American Environmental Container Corporation, 2302 Lasso Lane, Lakeland, Florida 33801.

FACILITY DESCRIPTION

The applicant operates the existing Lakeland Facility, which is a reinforced plastic composites production facility. The facility is located in Polk County at 2302 Lasso Lane, Lakeland, Florida.

This existing facility consists of only one (1) emissions unit. The emission unit produces swimming pools, spas, and other related products and is subject to 40 CFR 63, Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Compliance with emission limitations is demonstrated by recordkeeping.

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 for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit No. 1050250-008-AV issued November 9, 2006.
Application for a Title V Air Operation Permit Renewal received May 10, 2011.
Additional Information Request dated May 12, 2011.
Additional Information Response received July 12, 2011 and July 21, 2011.
Notice of Intent to Issue Air Permit issued July 28, 2011.
Public Notice Published August 19, 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 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 units at the facility, since the facility has no pollution control device.

PROJECT REVIEW

This renewed Title V air operation permit has the following changes from Title V Air Operation Permit No. 1050250-008-AV.

1. Specific Condition A.2.a.: ~~Total HAP~~ THAPs emissions from this ~~facility~~ emissions unit shall not exceed 180.0 tons in any consecutive 12-month period.

   This change is to clarify the allowable emissions for E.U. No. 002. This emissions limitation was established in Construction Permit No. 1050250-007-AC. Although the construction permit called this limitation a facility-wide limitation, the intent was to limit the emissions of E.U. No. 002, the one and only regulated emissions unit at this facility. This intent was clearly demonstrated by the recordkeeping requirements in the construction permit. Therefore, this change is not a relaxation from the construction permit.

2. Specific Condition A.2.b.: ~~Total HAP~~ THAPs emissions from "small" parts are restricted such that these "small" parts may not emit 100.0 tons ~~per year~~ or more in any consecutive 12-month period ~~of hazardous air pollutants (HAPs)~~.

   Changes the allowable total hazardous air pollutant emissions associated with "small" parts from a yearly basis to any consecutive 12-month period in order to match the recordkeeping requirements in Construction Permit No. 1050250-007-AC.

3. Specific Condition A.3.: ~~Total VOC~~ TVOCs emissions from this ~~facility~~ emissions unit including styrene and other HAPs that are VOCs, shall not exceed 180.0 tons in any consecutive 12-month period.

   See comment in No. 1 above.

4. The last sentence of Specific Condition A.4.k.: Documentation of ~~the~~ VOC emissions shall be determined by ~~a mass balance method, or~~ appropriate emission factors.

   Changes were made to eliminate the confusion for when usages are based on inventories.

5. Various administrative changes in Specific Condition A.4. to clarify when usage of materials may be based on inventories and purchases.

6. Re-formats the conditions and requirements in accordance with the new Title V permit template.

7. Replaces TV-6 with new Appendix TV.

8. Adding new Appendix RR.

9. Adding a list of applicable requirements in Specific Condition A.6. for 40 CFR 63, Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

10. The above ground level (AGL) stack height of the six identical 48-inch diameter fans for E.U. No. 002 is changed from the incorrect AGL stack height of 27 feet to the correct AGL stack height of 36 feet.

CONCLUSION

This project renews Title V Air Operation Permit No. 1050250-008-AV, which was issued on November 9, 2006. 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.