Title V Air Operation Permit Renewal
Permit No. 1050320-016-AV

APPLICANT

The applicant for this project is Keymark Corporation of Florida. The applicant's responsible official and mailing address are: Mr. Joseph R. Crenna, Vice President, Keymark Corporation of Florida, Keymark Lakeland Plant, 2540 Knights Station Road, Lakeland, FL, 33180.

FACILITY DESCRIPTION

The applicant operates the Keymark Lakeland Plant, which is located at 2540 Knights Station Road, Lakeland, FL, 33180.

This facility is an aluminum extrusion manufacturing facility that produces both mill finish (uncoated) and coated aluminum extrusions. The facility consists of Emission Unit No. 001 – Aluminum Extrusion Press Lines and Painting Operations, which is subject to the requirements of 40 CFR 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products and Emission Unit No. 003 – Paint Hook Cleaning Incinerator.

The paint line includes extrusion pretreatment tanks, dry off oven, automatic and manual paint booths, a dry powder spray booth, curing oven and the conveyor system, which transports extrusions through the coating process.

The wet paint system consists of two sets of back-to-back spray stations. Each spray booth is equipped with a two-stage particulate filter system on the booth exhaust. Stage one consists of replaceable filter pads. Stage two consists of replaceable filter packs. The combined particulate removal efficiency of the two-stage system is 99%.

The paint hook cleaning incinerator (EU No. 003) is used to remove cured paints and powder coatings from metal hooks, racks, and hangers used in the painting operations at the facility.

The facility is limited to a total emission of 247 ton/yr VOC, measured by inventory. In 2012 the actual VOC used was 108 ton.

Also included in this permit are miscellaneous unregulated or 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

Renewed Title V Air Operation Permit No. 1050320-015-AV issued **April 12, 2009**
Application for a Title V Air Operation Permit Renewal received **August 22, 2013**
Notice of Intent to Issue Air Permit issued **[Month day, year]** ***(To be determined)***
Public Notice Published **[Month day, year]** ***(To be determined)***

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 emissions 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 emissions units at the facility.

PROJECT REVIEW

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility

The following changes were made:

The permit was re-formatted to the current Title V template.

Appendices up-dated to current versions.

In the penultimate paragraph of the description of EU No. 001:

After exiting the paint spray booths, the extruded aluminum is conveyed through an open flash-off area (source of fugitive emissions through a stack designated as S15) to a curing oven. The curing oven is fired with natural gas at a maximum heat input rate of 5.00 MMBTU/hr., where the painted extruded aluminum is dried to produce the finished product. The curing oven is considered insignificant (see Appendix I-1). If the paint spray booths use "~~high performance coatings" that meet the American Architectural Manufacturer's Association Specifications 2604 or 2605~~ coatings that may cause objectionable odors, the emissions from the curing oven are vented to an insignificant regenerative thermal oxidizer (RTO) to reduce the possibility of objectionable odors before being exhausted to the atmosphere through a stack designated as S2. The RTO is considered insignificant (see Appendix I-1) and not defined as "Air Pollution Control Equipment". If the paint spray booths use ~~"non-high performance coatings"~~ coatings that are known not to cause objectionable odors, the emissions from the curing oven are vented to either the RTO or the RTO's by-pass stack designated as S2bp by using a vent damper.

Condition A.1.

A. No change

B Whenever the paint spray booths use ~~"high performance coatings" that meet the American Architectural Manufacturer's Association Specifications 2604 or 2605~~ coatings that may cause objectionable odors, the emissions from the curing oven shall be vented to the regenerative thermal oxidizer (RTO).

Condition A.5.

A-C No change

D. Daily (each daily log shall be completed by the end of the next operating day)

~~1.~~ If the VOC emissions for the most recent consecutive 12-month period exceed 223 tons, which is 90% of 247 tons, all the monthly logs mentioned above shall be kept on a daily basis. The permittee shall use this information to ensure that the VOC emissions for the upcoming consecutive 12-month

period do not exceed permit limitations. Should the consecutive 12-month period for VOC emissions fall below ~~445~~ 223 tons, the recordkeeping may revert to monthly.

~~2. In order to ensure the emissions from the use of "high performance coatings" in the paint spray booths are being vented to the RTO, record the following:~~

~~a. Start and end time of using "high performance coatings" in the paint spray booths along with the name of the high performance coating used.~~

~~b. Start and end time the RTO is operating.~~

E. Record the date of paint spray booth filter change outs along with identifying the paint spray booth.

~~F. Each coating shall have a "Product Data Sheet" from the coating's manufacturer that indicates whether the coating does or does not meet the American Architectural Manufacturer's Association Specifications 2604 or 2605.~~

The requirement to track start and end times for use of "high performance coatings" and the operating times for the Regenerative Thermal Oxidizer (RTO) associated with the paint spray booths (EU 001) has been dropped at the applicant's request. This requirement is unnecessary and not federally enforceable as:

1) The RTO is not a regulated emission unit and is not defined as pollution control equipment.
2) The facility does not claim a reduction in emissions when operating the unit.
3) The RTO is only operated to control odors. The "no objectionable odor" requirement remains in place and is considered adequate.

CONCLUSION

This project renews Title V Air Operation Permit No. 1050320-015-AV, which was issued on April 12, 2009. 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.