Keymark Corporation of Florida
Keymark Lakeland Plant

Facility ID No. 1050320
Polk County

Title V Air Operation Permit Renewal

Permit No. 1050320-016-AV
Renewal of Title V Air Operation Permit No. 1050320-015-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) 470-5700
Fax: (813) 470-5996

Compliance Authority:

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

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DRAFT/PROPOSED PERMIT

PERMITTEE:
Keymark Corporation of Florida
2540 Knights Station Road
Lakeland, Florida 33810-2505

Permit No. 1050320-016-AV
Keymark Lakeland Plant
Facility ID No. 1050320
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 Keymark Lakeland Plant is located in Polk County at 2540 Knights Station Road, Lakeland, Florida. UTM Coordinates are: Zone 17, 402.64 East and 3106.54 North. Latitude is: 28° 04' 56" North; and, Longitude is: 82° 00' 04" 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, 201x
Renewal Application Due Date: Exp. Date -225, 20xx
Expiration Date: Eff. Date + 5 years, 20xx

(Draft/Proposed)

_____

Kelley M. Boatwright
District Air Program Administrator
Southwest District

KMB/ras/~~cp~~/admin

Subsection A. Facility Description.

This facility is an aluminum extrusion manufacturing facility that produces both mill finish (uncoated) and coated aluminum extrusions. The facility includes two adjacent buildings located at 2540 and 2520 Knights Station Road. This facility is not a Prevention of Significant Deterioration (PSD) major facility, since the facility's allowable VOC emissions are less than 250 tons/yr.

The facility consists of Emission Unit No. 001 – Al Extrusion & Painting Operations: 6 Paint Spray Booths, 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.

Keymark operates two identical aluminum extrusion Press Lines, 1 and 2, which are located at 2540 Knights Station Road. Each of the identical press line includes a press, log heater, die oven, and tempering oven for the production of aluminum extrusions. The basic raw material is aluminum logs which are provided by outside suppliers. The combined maximum gross extrusion production capacity of Press Lines 1 and 2 is 44.7 million pounds per year, which is equivalent to 2,552 pounds per hour for each of the two presses on a 24-hour per day, 365 days per year basis.

Press line 3 is located at 2520 Knights Station Road. Press Line 3 includes a press, a natural gas fired log heater with a fuel capacity of 3.90 MMBtu/hr, electrically heated die ovens, and a natural gas fired tempering oven with a fuel capacity of 3.85 MMBtu/hr for the production of aluminum extrusions. The basic raw material is aluminum logs which are provided by outside suppliers. The gross production capacity of Press Line 3 is 33.7 million pounds per year, which is equivalent to 3,850 pounds per hour on a 24-hour per day, 365 days per year basis.

The facility also operates a paint line for the coating of a portion of the extrusions produced by the press lines. The paint line is located at 2540 Knights Station Road. It 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. Extrusions are prepared for painting by the surface pretreatment system which consists of seven 5,600 gallon unvented pretreatment dip tanks. Parts are conveyed through the dip tanks in the following order:

- Alkaline clean and etch
- Water rinse
- Water rinse
- Chromate-phosphate treatment
- Water rinse
- Water rinse
- Water rinse

The alkaline clean and etch bath contains sodium hydroxide and diethanolamine. The chromate-phosphate treatment bath contains chromic acid, phosphoric acid, and hydrofluoric acid.

After pretreatment, the extrusions are loaded onto the paint line conveyor, which transports the parts through the dry off oven to the paint booths. The system can handle extrusions of up to 40 feet in length, which may be stacked in parts packages up to seven feet in height for painting. The horizontal conveyor system is limited to a maximum line speed of 36 feet/minute by the design of the paint system. The wet paint system consists of two sets of back-to-back spray stations. Booths P1 and P2 each utilize three automatic Nordson Model RA-20 electrostatic rotary atomizers. Booths A1 and A2 each utilize four automatic Nordson Model RA-20 electrostatic rotary atomizers. Booths M1 and M2 each utilize one manual Nordson Model AN-8 electrostatic spray gun. 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. Only natural gas is fired in the incinerator at a maximum design heat input rate of 375,000 BTU/hr. in the primary chamber and 475,000 BTU/hr. in the afterburner. The incinerator is subject to Rule 62-296.401(1), F.A.C.

Also included in this permit are miscellaneous insignificant emission units and/or activities. There are twenty four identified point source air emission points at the facility.

Based on the Title V Air Operation Permit Renewal application received August 22, 2013, this facility is a major source of Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC).

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Al Extrusion & Painting Operations: 6 Paint Spray Booths
003	Paint Hook Cleaning Incinerator
Unregulated Emissions Units and Activities	
002	Natural Gas Fired Ovens and Heaters w/ Regenerative Thermal Oxidizer (RTO)
004	Sludge Dryer

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received August 22, 2013, this facility is a major source of hazardous air pollutants (HAP) and volatile organic compounds (VOC). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
Federal Regulations	
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products	001
State Regulations	
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. Not federally Enforceable - 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.
[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. The permittee shall comply with all of the following operation requirements:

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

b. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.

c. Tightly cover or close all VOC containers when they are not in use.

d. Prevent excessive air turbulence across exposed VOC/OS.

e. Immediately confine and clean up VOC/OS spills and make sure wastes are placed in closed containers for reuse, recycling, or proper disposal.

[Rule 62-296.320(1), F.A.C. and Construction Permit No. 1050320-014-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 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. Paving and maintenance of roads, parking areas and yards.

b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.

c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stockpiles and similar emissions units.

d. Removal of particulate matter from roads and other paved areas under the control of the permittee of the emissions unit to prevent re-entrainment, and from buildings or work areas to prevent particulate matter from becoming airborne.

e. Landscaping or planting of vegetation.

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

g. Confining abrasive blasting where possible.

h. Enclosure or covering of conveyor systems.

[Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 1050320-014-AC and, proposed by applicant in Title V air operation permit application received August 22, 2013.]

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. *(See also Appendix RR, Condition No. RR5.)*
[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. *(See also Appendix RR, Condition No. RR6.)*
[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. *(See also Appendix RR, Condition No. RR7.)*
[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]

***IMPORTANT NOTES TO PERMITTEE*:**

Permit Renewal - see Appendix TV, Condition No. TV18.
(Note - Renewal application is due 225 days prior to expiration date of this permit.)

Title V Semi-Annual Monitoring Reports - see Appendix RR, Condition No. RR4.

Subsection A. Emissions Unit No. 001 – Al Extrusion & Painting Operations: 6 Paint Spray Booths

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

EU ID No.	Brief Description
-001	Al Extrusion & Painting Operations: 6 Paint Spray Booths

This emission unit includes three (3) extrusion press lines. Line 1 is located to the west of Line 2 and Line 3 is located in an adjacent building relative to Lines 1 and 2. The maximum sustainable production capacity is 2,552 pounds of aluminum extrusions per hour for each of the two Lines 1 and 2; 3,850 pounds of aluminum extrusions per hour for Line 3. The maximum combined total production capacity is 44.7 million pounds per any consecutive 12-month period for Lines 1 and 2; 33.7 million pounds per any consecutive 12-month period for Line 3. Lines 1 and 2 include an aluminum log heater (each 4.88 MMBTU/hr.), extrusion press, tempering oven (each 5.00 MMBTU/hr.), and die oven (Line 1 – 0.45 MMBTU/hr. & Line 2 – 0.80 MMBTU/hr.). Line 3 includes a press, a natural gas fired log heater (3.90 MMBtu/hr), electrically heated die ovens, and a natural gas fired tempering oven (3.85 MMBtu/hr). The heaters and ovens are fired with natural gas and are considered insignificant (see Appendix I-1).

Extruded aluminum from the three (3) tempering ovens is transferred to and may be dipped into a series of up to seven (7) 5,600 gallon open pre-treatment tanks. The pre-treatment tanks clean the aluminum and apply a conversion coating to enhance paint adhesion. The first, fourth, and seventh tanks each have a heater fired with natural gas at a maximum heat input rate of 2.00 MMBTU/hr. The pre-treatment tanks and heaters are considered insignificant (see Appendix I-1).

After the pre-treatment tanks, the extruded aluminum is loaded onto the paint line overhead conveyor system, which moves the aluminum to a dry-off oven. Extruded aluminum from the dry-off oven is then conveyed to either:

- a dry powder coat booth followed by an infrared oven then through a series of four (4) automatic paint spray booths (Nos. P1, P2, A1, and A2) and two (2) manual paint spray booths (Nos. M1 and M2); or

- a series of four (4) automatic paint spray booths (Nos. P1, P2, A1, and A2) and two (2) manual paint spray booths (Nos. M1 and M2).

The dry powder coat booth is not considered a source of air emissions. The dry-off oven is fired with natural gas at a maximum heat input rate of 1.50 MMBTU/hr. The infrared oven is fired with natural gas at a maximum heat input rate of 1.30 MMBTU/hr. The dry-off oven and infrared oven are considered insignificant (see Appendix I-1).

Emissions from each automatic and manual booth are exhausted through each booth's exhaust stack. Each booth's exhaust stack is equipped with a two-stage fiber filter system to control particulate overspray. VOC and HAP emissions from the paints, coatings, thinners, and cleanup solvents are emitted uncontrolled through the paint spray booth exhaust stacks. Since the paint spray booths and a paint mix room have openings, the VOC and HAP emissions are also emitted fugitively. Automatic paint spray booths P1, P2, A1, and A2 exhaust through stacks designated as S20, S21, S4, and S3, respectively. Manual paint spray booths M1 and M2 exhaust through stacks designated as S6 and S5, respectively.

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 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 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.

Although, the paint spray booths and the insignificant curing oven are expected to represent the majority of potential air pollutants from the facility, evaporative VOC emissions from all activities at this emission unit are tracked in the usage recordkeeping for the paint spray booths.

{Permitting note: IMPORTANT REGULATORY CLASSIFICATIONS – This emission unit is regulated under MACT; 40 CFR 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, adopted and incorporated by reference in Rule 62-204.800(11), F.A.C.}

Essential Potential to Emit (PTE) Parameters

A.1. Methods of Operation - The permittee shall comply with the following:

A. Each paint spray booth shall have a two-stage fiber filter system to control paint overspray emissions. Stage one shall consist of replaceable filter pads and stage two shall consist of replaceable filter packs.

B. Whenever the paint spray booths use coatings that may cause objectionable odors, the emissions from the curing oven shall be vented to the regenerative thermal oxidizer (RTO).

[Rules 62-296.320(2) and (4), F.A.C.; Construction Permit 1050320-014-AC]

A.2. Hours of Operation - This emissions unit may operate continuously (8,760 hours/year).

[Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit No. 1050320-014-AC]

Emission Limitations and Standards

A.3. VOC Emission Limitation: The maximum VOC emissions shall not exceed 247 tons per any consecutive 12-month period from the painting operations.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit 1050320-014-AC; Effective date: 01/31/2010]

A.4. Reasonable Assurance Requirement. In order to provide reasonable assurance the fiber filter systems are adequately controlling emissions of unconfined particulate matter, visible emissions from the paint spray booths' stacks should not exceed 5% opacity. Exceeding this value shall not be considered a violation in and of itself, but an indication that additional control precautions and/or measures may be necessary.
[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1050320-014-AC]

Recordkeeping and Reporting Requirements

A.5. Recordkeeping Requirement – A recordkeeping log shall be established and maintained to document compliance with Condition A.3. At a minimum, the log shall identify and quantify each paint, coating, thinner, and solvent used in the painting operations, which contain VOCs. Documentation of solvents consumed, such as during spray paint gun/hose cleanup, may use a mass balance method to determine usage (amount used minus amount collected for disposal or recycle). At the permittee's option, "purchases" may be used where "usage" is specified, except when daily recordkeeping is required as described below. If this option is utilized, no materials may be used, which are not purchased. The permittee shall calculate and record, at a minimum, the following:

A. Facility name and Emission Unit ID No. 001 (for each record in C., D., and E. below)

B. Date (for each record in C., D., and E. below)

C. Monthly (each month's log shall be completed by the first operating day of the next month)

1. Usage of each paint coating, thinner, solvent, and other materials, which contain VOCs in gallons.
2. Density (lbs./gal.) and VOC content in lbs./gal. of each item in A.5.C.1.
3. Total VOC emissions (lbs. or tons).
4. Total VOC emissions (tons) for the most recent consecutive 12-month period.

D. Daily (each daily log shall be completed by the end of the next operating day) 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 223 tons, the recordkeeping may revert to monthly.

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

Supporting documentation (MSD sheets, purchase orders, U.S. EPA "VOC DATA SHEETS", etc.) shall be kept for each paint, coating, thinner, solvent, and other material used in the painting operations, which includes sufficient information to determine VOC emissions. These records shall be retained at the facility for at least five years and shall be made available to the Department upon request.
[Rules 62-4.070(3) and 62-213.440, F.A.C.; Construction Permit 1050320-014-AC; Effective date: 01/31/2010]

Other Requirements

A.6. Federal NESHAP Requirements - The painting operations/activities associated with Emission Unit No. 001 are subject to the applicable provisions* of the MACT standards of 40 CFR 63, Subpart MMMM – Miscellaneous Metal Parts and Products (Surface Coating), as adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C. These provisions are shown in their entirety in ATTACHMENT A, which is a part of this permit. ATTACHMENT A includes the applicable provisions of 40 CFR 63, Subpart A – General Provisions.

* The following applicability references are based upon the permittee's combined Construction and Title V Air Operation permit applications dated October 05, 2009 (associated with Permit Nos. 1050320-014-AC and 1050320-015-AV). Therefore, any change in operations may change the applicable provisions.

40 CFR 63 Subpart MMMM Applicable Provision References
(Entire section applies unless otherwise noted with specific applicable subsection references)

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63.3880 What is the purpose of this subpart?
63.3881 Am I subject to this subpart?
63.3881(a) through (c)
63.3881(e) through (e)(3)
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63.3883 When do I have to comply with this subpart?
63.3883(c)(1) and (d)

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63.3890(a) and (c)
63.3891 What are my options for meeting the emission limits?
63.3891(a) and (b)
63.3892 What operating limits must I meet?
63.3892(a)
63.3893 What work practice standards must I meet?
63.3893(a)

General Compliance Requirements
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63.3901 What parts of the General Provisions apply to me?

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63.3910 What notifications must I submit?
63.3910(a) through (c)(8)(ii)
63.3910(10) and (11)
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63.3930(d) through (j)
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63.3940 By what date must I conduct the initial compliance demonstration?
63.3941 How do I demonstrate initial compliance with the emission limitations?
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Compliance Requirements for the Emission Rate Without Add-On Controls Options?
63.3950 By what date must I conduct the initial compliance demonstration?
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Table 3 to Subpart MMMM of Part 63 – Default Organic HAP Mass Fraction for Solvents and Solvent Blends
Table 4 to Subpart MMMM of Part 63 – Default Organic HAP Mass Fraction for Petroleum Solvent Groups

Appendix B to Subpart MMMM of Part 63 – Applicability of General Provisions to Subpart MMMM of Part 63

[Rules 62-204.800(11) and 62-213.400, F.A.C.; 40 CFR 63, Subpart MMMM]

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

EU ID No.	Brief Description
-003	Paint Hook Cleaning Incinerator

This emission unit consists of a Pollution Control Products, Model PRC-330 incinerator. The incinerator is used to remove cured paints and powder coatings from metal hooks, racks, and hangers used in the painting operations at the facility. Only natural gas is fired in the incinerator at a maximum design heat input rate of 375,000 BTU/hr. in the primary chamber and 475,000 BTU/hr. in the afterburner. The incinerator is subject to Rule 62-296.401(1), F.A.C.

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. During each incineration batch, which is typically from 2 – 8 hours, the incinerator shall contain no more than a total of 250 pieces of equipment to be cleaned. The equipment consists of hooks, racks, and/or hangers.
[Rule 62-297.310(2), F.A.C.; Construction Permit 1050320-006-AC]

B.2. Methods of Operation - The incinerator shall comply with the following:

A. The incinerator shall be fired only with natural gas.

B. The afterburner (secondary chamber) shall be maintained at no less than 1,500 °F during the entire "clean cycle" of a batch. Note, each incinerator batch includes a warm-up cycle, a clean cycle, and cool down cycle. The clean cycle time for each batch is established by the incinerator's electronic controller, which is set by the operator.

C. The incinerator, when operating, shall have a continuous monitor that digitally displays the afterburner's temperature.

[Rule 62-210.200 (PTE), F.A.C.; Construction Permit 1050320-006-AC]

B.3. Hours of Operation - This emissions unit may operate continuously (8,760 hours/year).
[Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit No. 1050320-006-AC]

B.4. Emissions Unit Operating Rate Limitation After Testing - See the related testing provisions in Appendix TR, Facility-wide Testing Requirements.
[Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

(Permitting Note - The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

B.5. Visible Emissions (VE) Limitation - Visible emissions shall not exceed five percent (5%) opacity except that visible emissions not exceeding fifteen percent (15%) opacity are allowed for up to six (6) minutes in any one (1) hour period.
[Rule 62-296.401(1)(a), F.A.C.; Construction Permit 1050320-006-AC]

B.6. Objectionable Odors -There shall be no objectionable odors. An objectionable odor is 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.
[Rules 62-210.200(221) (Definition of Objectionable Odor), and 62-296.320(2), F.A.C.; Construction Permit 1050320-006-AC]

Excess Emissions

B.7. Excess Emissions Allowed - Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

B.8. Excess Emissions Prohibited - Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

B.9. Excess Emissions Reporting - In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

Test Methods and Procedures

(Permitting Note - The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.)

B.10. Compliance Test Method - Required compliance tests shall be performed in accordance with the following reference method:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.
[Rules 62-296.401(1)(b), 62-297.310(4)(a)2., and 62-297.401, F.A.C.]

B.11. Common Testing Requirements - Unless otherwise specified, compliance tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.
[Rule 62-297.310, F.A.C.]

B.12. Annual Compliance Tests Required - During each federal fiscal year (October 1st to September 30th), the incinerator shall be tested to demonstrate compliance with the emissions standards for visible emissions.
[Rule 62-297.310(7), F.A.C. and Construction Permit No. 1050320-006-AC]

B.13. Visible Emission Test Method: Compliance with the visible emission limitation(s) shall be determined in accordance with EPA Method 9 and shall be conducted by a certified observer. The visible emission test shall be at least 60 minutes in duration and include the period when the highest opacity emissions are expected to occur (i.e., during the initial 60 minute period of the clean cycle, unless some other period can be shown to be a period with higher emissions). The minimum requirements for stack sampling facilities, source sampling, and reporting shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A.
[Rules 62-296.401(1)(b), 62-297.310(4)(a)2., and 62-297.401, F.A.C.]

B.14. Operating Rate During Testing: Testing of the incinerator shall be conducted within 90-100% of the permitted capacity, which is 250 pieces of equipment. If it is impracticable to test at 90-100% of the permitted capacity, an emission unit may be tested at less than the maximum permitted capacity; in this case, subsequent emission unit operation is limited to 110 percent of the test rate (pieces of equipment) until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. The test results shall be submitted to the Air Compliance Section of the Department's Southwest District Office within 45 days of testing. Acceptance of the test by the Department will automatically constitute an amended permit at the higher tested rate, plus 10%, but in no case shall the maximum permitted capacity of 250 pieces of equipment be exceeded.
[Rule 62-297.310(2), F.A.C.]

B.15. Information Required With Visible Emission Test Reports: All visible emission test reports for the incinerator shall include a copy of the records as required by Specific Condition No. B.5. for the tested batch. Failure to include the records with the test report or operating at condition which do not reflect normal operating conditions, may invalidate the test.
[Rules 62-4.070(3) and 62-297.310(8), F.A.C.]

B.16. Test Notification. The permittee shall notify the Air Compliance Section of the Department's Southwest District at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner.
[Rule 62-297.310(7)(a)9., F.A.C.]

Recordkeeping and Reporting Requirements

B.17. A log shall be kept for each batch of the incinerator to document compliance with Specific Condition No. B.1. and B.2.B. The log shall contain, at a minimum, include the following:

A. Facility ID (1050320) and Emission Unit ID (003)

B. Date

C. Batch No.

D. For each batch the number of pieces of equipment cleaned.

E. The batch start time as determined when a part(s) is placed in the oven and the firing of natural gas is initiated.

F. The batch end time as determined when the natural gas is shut off.

G. Total time of each batch, in hours.

H. The cumulative calendar year total batch operating hours.

I. The afterburner's temperature just after the primary chamber is fired with natural gas, which is considered the start of a clean cycle.

J. The afterburner's temperature just before the natural gas is turned off.

K. Operator's signature.

These records shall be recorded in a permanent form suitable for inspection by the Department upon request and maintained at the facility for at least the most recent 5 years.
[Rules 62-4.070(3) and 62-213.440, F.A.C.; Construction Permit 1050320-006-AC]

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 – NESHAP General Provisions

Appendix NESHAP 40 CFR 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

Appendix RR, Facility-wide Reporting Requirements

Appendix TR, Facility-wide Testing Requirements

Appendix TV, Title V General Conditions

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History

Table 1, Summary of Air Pollutant Standards and Terms

Table 2, Compliance Requirements

Statement of Basis