FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

Sapa Extrusions North America
200 Riviera Boulevard
St. Augustine, Florida 32086

Air Permit Number: 1090447-013-AC
Date of Issue: November 19, 2013
Expiration Date: June 19, 2014

Authorized Representative:
Mr. Bob Gregory, Director of Operations

St. Augustine Facility
Trial of Remelt Furnace w/o wet scrubber
PM, VE, and HCl Performance Testing

This is the final air construction permit, which authorizes the temporary allowance for the Remelt Furnace to operate without the wet scrubber during a simultaneous Particulate Matter (PM) and Visible Emissions (VE) performance test. This will allow the facility an opportunity to demonstrate that the VE standard of 20% opacity can be met without the need of the wet scrubber when 35 percent of the aluminum that is charged in the Remelt Furnace contains paint, lubricants, or other foreign materials. The concurrent PM test will allow the facility to demonstrate that the PM emissions (without the wet scrubber in operation) will be similar to the estimates stated within the permit application. The construction permit also requires the facility to conduct a Hydrogen Chloride (HCl) performance test to determine actual HCl emissions while operating the Remelt furnace under the aforementioned scenario and whether the facility will remain a minor source of HAP emissions due to this pollutant.

The facility has also dismantled the wet paint line associated with Emissions Unit 001 – Surface Coating. The emissions associated with this activity (VOCs and HAPs) are no longer part of the facility's potential to emit.

The proposed testing will be conducted at the Sapa Extrusions North America St. Augustine facility, which is a Secondary Aluminum Production Facility (Standard Industrial Classification No. 3354 & 3341). The facility is located in St. Johns County at 200 Riviera Boulevard, St. Augustine, Florida. The UTM coordinates are Zone 17, 470.98 km East; 3296.85 km North. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Richard S. Rachal III, P.G. November 19, 2013
Program Administrator
Waste and Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on **November 19, 2013**, to the persons listed below.

Mr. Bob Gregory, Sapa Extrusions North America.:Bob.Gregory@sapagroup.com
Mr. Bert Long, Sapa Extrusions North America.: Bert.Long@sapagroup.com
Mr. Jason Floyd, Sapa Extrusions North America: Jason.Floyd@sapagroup.com
Mr. Kennard F. Kosky, Golder Associates, Inc.: kkosky@golder.com

Clerk Stamp
FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) November 19, 2013

FACILITY DESCRIPTION

Sapa Extrusions North America is a secondary aluminum production facility. The standard industrial classification (SIC) codes for the facility's activity are 3354 (extruded aluminum products) and 3341 (secondary smelting and refining of non-ferrous metals). The facility consists of an aluminum melting furnace, a holding furnace, two homogenizing ovens, aluminum extrusion operations, wet and powder paint operations, and ancillary operations.

The remelt facility or cast house contains natural gas fired melting and holding furnaces, an in-line argon fluxer/degasser, casting pit and homogenizing ovens. Clean and painted scrap aluminum mixed with prime (ingot, sows) is loaded into the melting furnace in pre-determined ratios.

Hot dross is skimmed from the molten aluminum and cooled prior to stockpiling in the dross room pending transport to an off-site facility for metal recovery. Molten aluminum is fed from the melting furnace to the holding furnace. Alloying materials may be added during this transfer and while the metal is being stirred in the holder. The metal is transferred from the holding furnace to the casting table for vertical, direct-chill casting into logs. During the transfer from the holder to the casting process, the in-line fluxer or degassing unit injects argon gas into the molten metal.

Degassing removes hydrogen, oxides and other impurities that can lead to formation of porosity/inclusions in the solidified metal. The cast aluminum logs are placed in a homogenizer for heat treatment to achieve uniform grain size in the metal prior to saw cut for shipment to an extrusion plant.

Extrusion operations occur via three aluminum press operations and two drawn tube operation. Aluminum billets are heated and extruded through various dies to form various shaped products. Aluminum tubes and shapes are further processed in age ovens and drawn tubing and OPC departments age ovens for heat treating. In some areas (GDT and OPC), aluminum tubes are dipped into a solvent tank to remove drawing oils.

The facility also operates a paint line that consists of a horizontal electrostatic powder coat operation.

Before the aluminum can be painted, it must go through a pretreatment process in which the metal is cleaned and etched, then coated with a microscopic layer of chrome which helps the paint adhere to the aluminum and also provides some underlying corrosion protection (chromium conversion pretreatment). The horizontal pretreatment line is operated in open tanks.

Aluminum parts are placed in racks and then dipped into the first pretreatment tank of a 3-5 percent sodium hydroxide caustic solution. The solution is heated to approximately 120 degrees F by steam generated from the Paint Line Boiler (insignificant emissions unit). This pretreatment aids in the removing of surface oils from the aluminum and provides a slight etch.

The aluminum parts then are dipped in a water rinse tank followed by the chromium conversion bath. The chromium bath consists of 1-2 percent chromium, 3-6 percent phosphoric acid, less than 0.07 percent hydrofluoric acid, and the balance water. The solution is heated to 120-130 degrees F by steam also generated from the Paint Line Boiler. This treatment coats the aluminum so that the powder paint will adhere and also provides some corrosion protection should the finished painted product becomes chipped or the paint comes off the aluminum. Following the chromium conversion bath, the aluminum parts are dipped into a water rinse tank before being sent to a drying oven. The aluminum parts are then taken out of the racks, hung on an overhead conveyor that carries the parts through the automatic powder-paint spray operation followed by the bake oven.

The paint line includes ancillary equipment, including a pyrolysis oven for the removal of overspray paint from the paint line equipment (parts and conveyor hooks).

The existing facility consists of the following emission units.

Facility ID No. 1090447

ID No.	Emission Unit Description
001	Surface Coating Operations Two Chromium conversion Pretreatment Operations
003	Holding Furnace
004	Remelt Furnace
005	No. 1 and No. 2 Homogenizing Furnaces
006	OPC Solvent Tank
009	GDT Solvent Tank
010	In-line Fluxer

PROPOSED PROJECT

- Sapa Extrusions North America is requesting the temporary allowance to operate the Remelt Furnace (EU 004) without the wet scrubber in operation during a Particulate Matter and a simultaneous visible emissions performance test. This will allow the facility an opportunity to demonstrate that the VE standard of 20% opacity can be met without the need of the wet scrubber when 35 percent of the aluminum that is charged in the Remelt Furnace contains paint, lubricants, or other foreign materials. The concurrent PM test will allow the facility to demonstrate that the PM emissions (without the wet scrubber in operation) will be similar to the estimates stated within the permit application.
- The construction permit also requires the facility to conduct a Hydrogen Chloride (HCl) performance test to determine actual HCl emissions while operating the Remelt furnace under the aforementioned scenario and whether the facility will remain a minor source of HAP emissions due to this pollutant.
- The facility has also dismantled the wet paint line associated with Emissions Unit 001 – Surface Coating. The emissions associated with this activity (VOCs and HAPs) are no longer part of the facility's potential to emit.

This project will involve the following emissions units.

Facility ID No. 1090447

ID No.	Emission Unit Description
001	Surface Coating Operation One Chromium conversion Pretreatment Operation
004	Melting Furnace

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a synthetic Non-Title V source.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

The Remelt Furnace (EU 004), the Holding Furnace (EU 003), and the In-Line Fluxer (EU 010) are subject to the requirements of 40 CFR 63, Subpart RRR - National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production, and the 40 CFR 63 Subpart A General Provisions which are adopted by reference in Rule 62-204.800(8), F.A.C., for area sources.

The two diesel fired engines (EU 011 and EU 012) are subject to the requirements of 40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The chromium conversion pretreatment process (EU 001) is subject to regulation under 40 CFR 63, Subpart WWWWWW – National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations. It is noted that the State has not adopted this Subpart as of issuance of this permit.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Application for Air Permit-Long Form received August 28, 2013
Additional Information received September 18, 2013
Additional Information received October 18, 2013

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Northeast District Office, Waste and Air Resource Management. The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance. The mailing address and phone number of the District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Compliance Authority's telephone number is 904/256-1700.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. Existing Permits and Regulations: This permit supplements all previous permits issued for the above named emissions units. These conditions supersede corresponding similar conditions specified in previous air construction permits. However, if not specifically regulated by this permit, the standards and permit requirements from previous air construction permits remain valid. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, and the like.

   [Rule 62-4.070, F.A.C.]

6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

   [Rule 62-4.080, F.A.C.]

7. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.

   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

8. Source Obligation:

(a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

(b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

This section of the permit addresses the following emissions unit/units.

ID No.	Emission Unit Description
004	Remelt Furnace *The Remelt Furnace is a melting furnace authorized to process either clean charge* or *aluminum that contains paint, lubricants, coatings, or other foreign materials. The Remelt Furnace or the "South furnace" is manufactured by Thorpe Technologies. It has two emissions points. One of the emissions points (stack height: 55', inside diameter: 27") is equipped with a wet scrubber (Manufactured by Turner EnviroLogic, Inc.). The second emissions point (stack height: 51' 4", inside diameter: 67") is not equipped with a control device. The Remelt Furnace can operate as either a Group 1 or Group 2 furnace as defined by 40 CFR 63.1503.* *The unit is subject to 40 CFR 63, Subpart RRR - National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production.*

EMISSIONS STANDARDS

A.1. The furnace is subject to 40 CFR 63, Subpart RRR. The applicable requirements are stated in Permit No. 1090447-012-AF.

[40 CFR 63.1500]

A.2. Visible Emissions Limit: Visible emissions from this emissions unit shall not exceed 20% opacity.

[Rule 62-4.070(3), F.A.C., Permit No. 1090447-001-AC, Permit No. 1090447-009-AC, Permit No. 1090447-012-AF]

TEMPORARY PROJECT ACTIVITIES – PERFORMANCE TESTING

A.3. Remelt Furnace - Performance Test for Particulate Matter (PM): For the purpose of this project, the owner or operator shall conduct a single performance test for particulate matter using EPA Method 5 in Appendix A of 40 CFR 60 at the Remelt Furnace without the wet scrubber in operation during the performance test.

The performance test shall be conducted while the Remelt Furnace is:

1) operating at a feed/charge of 30 tons per operating cycle, and
2) processing 35% (by weight of the total charge mixture) aluminum that contains paint, lubricants, coatings, or other foreign materials.

The performance test shall consist of three separate runs and the pollutant sampling for each run shall be conducted over the entire process operating cycle.

Specific Condition A.3. Continued:

The purpose of this performance test is to determine the PM emissions without the wet scrubber in operation when aluminum containing paint, lubricants, coating, and other foreign materials is charged in the furnace at the maximum rate of 35% by weight of the total charge mixture.

Upon completion of this particulate matter emissions test, the Permittee shall resume operation of the wet scrubber with the Remelt Furnace when aluminum that contains paint, lubricants, coatings, or other foreign materials is charged in the furnace, unless otherwise stated by the Department in a written Determination.

Specifically, the wet-scrubber shall operate during the charging of charge/feed materials, from the beginning of the charge for a minimum of 30 minutes after the charge door closes following the last push of charge material when aluminum that contains paint, lubricants, coatings, or other foreign materials is charged in the furnace.

The Department's Rule 62-210.650, F.A.C. – Circumvention, shall not apply during this performance test.

[Application No. 1090447-013-AC, and Rule 62-4.070, F.A.C.]

A.4. Site Specific Test Plan: Prior to conducting the performance test as described by Specific Condition Nos. A.3. and A.6., the owner or operator shall prepare and submit to the Department a site-specific test plan in accordance with 40 CFR 63.7(c)(2). The Department will approve or disapprove the submitted test plan in accordance with 40 CFR 63.7(c)(3).

[Rule 62-4.070, F.A.C.]

A.5. Remelt Furnace -Performance Test for Visible Emissions: For the purpose of this project, the owner or operator shall conduct opacity tests for the Remelt Furnace without the wet scrubber in operation during the opacity tests. The opacity limitation is as stated in the Permit No. 1090447-012-AF, i.e. shall not exceed 20% opacity.

The opacity testing shall be conducted concurrently with the PM test authorized in Specific Condition No. A.3, while the Remelt Furnace is processing 35% (by weight of the total charge mixture) aluminum that contains paint, lubricants, coatings, or other foreign materials and is operating at a feed/charge of 30 tons per operating cycle.

The duration of the testing shall be at least 1 hour (during each run) and up to the entire operating cycle, and shall be conducted from the beginning of the operating cycle. The test method shall be EPA Method 9, adopted by reference in Rule 62-204.800, F.A.C.

Upon completion of this visible emissions testing, the Permittee shall resume operation of the wet scrubber with the Remelt Furnace when aluminum that contains paint, lubricants, coatings, or other foreign materials is charged in the furnace, unless otherwise stated by the Department in a written Determination.

Specific Condition A.5. Continued:

Specifically, the wet-scrubber shall operate during the charging of charge/feed materials, from the beginning of the charge for a minimum of 30 minutes after the charge door closes following the last push of charge material when aluminum that contains paint, lubricants, coatings, or other foreign materials is charged in the furnace.

The Department's Rule 62-210.650, F.A.C. – Circumvention, shall not apply during this opacity test.

[Application No. 1090447-013-AC, and Rule 62-4.070, F.A.C.]

A.6. Remelt Furnace - Performance Test for Hydrogen Chloride (HCl): For the purpose of this project, the owner or operator shall conduct a single performance test for hydrogen chloride using EPA Method 26A in Appendix A of 40 CFR 60 at the Remelt Furnace without the wet scrubber in operation during the performance test.

The performance test shall be conducted while the Remelt Furnace is:

1) operating at a feed/charge of 30 tons per operating cycle, and
2) processing 35% (by weight of the total charge mixture) aluminum that contains paint, lubricants, coatings, or other foreign materials.

The performance test shall consist of three separate runs and the pollutant sampling for each run shall be conducted over the entire process operating cycle.

The purpose of this performance test is to determine the HCl emissions without the wet scrubber in operation when aluminum containing paint, lubricants, coating, and other foreign materials is charged in the furnace at the maximum rate of 35% by weight of the total charge mixture.

[Application No. 1090447-013-AC, and Rule 62-4.070, F.A.C.]

A.7. Performance Tests & Visible Emission Observation Notifications:

a. As required by §63.9(e) and (f), the owner or operator must provide notification of the anticipated date for visible emission observations. The owner or operator must notify the Department of the intent to conduct an opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.

b. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit

[Rule 62-297.310(7)(a)9., F.A.C., 40 CFR 63.1515(a)(6)]

RECORDS

A.8. Remelt Furnace -Wet Scrubber Operating Status: The owner or operator shall maintain records of the operating status of the wet scrubber (time, date, on/off status).

[Rule 62-4.070, F.A.C.]

A.9. Remelt Furnace Operating Rate: The owner or operator shall measure and record the following information:

a. The total weight of the feed/charge to the Remelt Furnace for each of the three test runs and calculate and record the total weight.

b. The weight of the feed/charge to the melting furnace of aluminum that contains paint, lubricants, coatings, or other foreign materials for each operating cycle, and the record as percent (%) by weight of the total charge mixture for each operating cycle.

[Rule 62-4.070, F.A.C.]

REPORTS

A.10. Particulate Matter Performance Test & Visible Emission Observation Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rule 62-297.310(8), F.A.C.]

Subsection B. Revisions to Subsection A of Permit No. 1090447-012-AF, EU 001: Surface Coating Operations and Paint Line Operations

This permit makes the changes identified below with strikethrough and under line font to Subsection A - Emission Unit 001- Surface Coating Operations of Permit No. 1090447-012-AF:

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

EU No.	Brief Description
-001	**Surface Coating Operation~~s~~. Paint Line Operation~~s~~.** *This emissions unit consists of ~~one vertical wet paint booth and two~~ one chromium pretreatment operation~~s; one for the wet paint line and one~~ for the powder paint line.* ~~*Surface coating, in the vertical wet paint booth, is conducted by the application of coating using an electrostatic rotating head to the metal surface. The surface coating from this operation is a potential source of volatile organic compounds (VOCs) and HAP emissions.*~~ ~~*Surface coating operations also includes associated activities, such as cleaning, mixing, and paint/solvent storage.*~~
	~~**Two**~~ **One Chromium Conversion Pretreatment Operations**. ~~These pretreatment lines are coordinated with the facility's two paint lines.~~ The ~~two~~ chromium conversion pretreatment line~~s~~ ~~are~~ is subject to the NESHAP requirements of 40 CFR 63 Subpart WWWWWW. ***Horizontal, open tank, pretreatment line:*** *Aluminum parts are placed in racks and then dipped into a heated, caustic solution pretreatment tank (5,000 gallons), followed by a water rinse dip tank, chromium conversion dip bath (5,000 gallons), water rinse dip tank, and followed by a drying oven. The aluminum parts are then taken out of the racks, hung on an overhead conveyor that carries the parts through the automatic powder-paint spray operation followed by the bake oven. Heat is supplied by steam generated from the Paint Line Boiler (insignificant emissions unit).* ~~***Vertical, closed tank, pretreatment line:*** *Aluminum parts are hung on an overhead conveyor that carries the parts through the entire pretreatment and painting process. The parts first enter a tank and treated with a heated, acidic cleaner, parts pass through a spray water rinse before being sent to the chromium conversion pretreatment spray process. The aluminum parts go through two, clean water spray rinses before being sent to a drying oven. After the drying oven, the aluminum parts are painted using a wet spray gun and followed by the bake oven. Heat is supplied by steam generated from the Paint Line Boiler (insignificant emissions unit).*~~

Surface Coating Operation:

~~**Essential Potential to Emit (PTE) Parameters**~~

~~**B.1.** Permitted Capacity: The maximum volatile organic compound (VOC) containing coatings usage rate shall not exceed 6,000 gallons per any 12 consecutive months[1].~~

~~The maximum volatile organic compound (VOC) containing solvent usage rate shall not exceed 440 gallons per any 12 consecutive months[2].~~

~~Volatile organic compound (VOC) means any compound defined as VOC in 40 CFR 51.100(s).~~

~~[1] Based on a maximum VOC content of 4.91 pounds per gallon~~

~~[2] Based on a maximum VOC content of 7.95 pounds per gallon.~~

~~[Permit No. 1090447-002-AC, Permit No. 1090447-009-AC; Application No. 1090447-012-AF; Rules 62-210.200(PTE), 62-210.200(definitions), 62-4.070(3), F.A.C.]~~

~~**B.2.** Method of Operation: The owner or operator shall not use HAP-containing solvents. The owner or operator may use HAP or non-HAP-containing coatings.~~

~~[Rules 62-210.200(PTE) & 62-4.070(3), F.A.C]~~

~~**B.3.** Hours of Operation: The hours of operation are not limited (8760 hours/year).~~

~~[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Permit No. 1090447-009-AC]~~

~~**Work Practice Standards**~~

~~**B.4.** All VOC-containing coatings, solvent and waste materials shall be stored in closed containers, except when adding to, removing, or mixing the contents.~~

~~[Rules 62-296.320(1) and 62-4.070(3), F.A.C.; Permit No.1090447-009-AC]~~

~~**Compliance Demonstration**~~

~~**B.5.** By the end of the following calendar month, the owner or operator shall determine the total coating and solvent usages for the month (i.e. – Owner or operator shall determine February usage by the end of March). The owner or operator shall also determine the 12-month rolling sum of coating and also solvent usage by summing the monthly coating and solvent usage for the previous 12 consecutive months. The 12 consecutive month sum of coating and solvent usage shall be used to demonstrate compliance with the coating and solvent usage rate limitation as stated in Condition No. B.1. of this subsection.~~

~~[Rule 62-4.070(3), F.A.C.; Permit No.1090447-009-AC]~~

~~**B.6.** The owner or operator shall use the information from the supplier or manufacturer to demonstrate that each solvent used for the unit does not contain HAP.~~

~~[Rule 62-4.070(3), F.A.C.; Permit No.1090447-009-AC]~~

~~**Recordkeeping and Reporting Requirements**~~

~~**B.7.** HAP Emissions -Reporting: The owner or operator shall estimate the individual HAP and total HAPs emissions on a monthly as well as a 12-month rolling basis. The records shall be made available to the Department or federal air pollution agency upon request. The individual and total HAP emissions shall be reported in the in Annual Operating Report (AOR).~~

~~[Rule 62-4.070(3), F.A.C. and Permit No.1090447-009-AC]~~

~~**B.8.** Recordkeeping: The owner or operator shall keep the following records:~~

~~a. The type, quantity in gallons, and weight in pounds, of VOC containing coating and solvent used each calendar month.~~

~~b. Information from the supplier or manufacturer demonstrates that each solvent used does not contain HAP.~~

~~c. The VOC and HAP content by weight (in pounds per gallon) of each VOC containing coating used shall be determined using supplier data (NSDS sheets, as supplied data sheets, EPA Method 24, etc.).~~

~~d. The VOC content by weight (in pounds per gallon) of each VOC containing solvent used shall be determined using supplier data (NSDS sheets, as supplied data sheets, EPA Method 24, etc.).~~

~~e. Beginning and ending inventories of VOC containing coating and solvent (usage and VOC content) each calendar month and the amount of coating and solvent purchased during each calendar month as documented through purchase receipts, records and sales receipts.~~

~~f. The total volume of VOC containing coating & solvent used each month.~~

~~g. The total volume of VOC containing coating & solvent used during each 12 consecutive months.~~

~~h. The total volume of HAP containing coating used each month.~~

~~i. The total volume of HAP containing coating used during each 12 consecutive months~~

~~The owner or operator shall keep the records described above for a period of at least 3 years.~~

~~[Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.; Permit No.1090447-009-AC, Application No. 1090447-012-AF]~~

~~Two~~ Chromium Conversion Pretreatment Operations

Essential Potential to Emit (PTE) Parameters

B.9. Hours of Operation: The hours of operation of this emissions unit are not limited (8760 hours per year).

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., Permit No. 1090447-009-AC]

B.10. NESHAP, 40 CFR 63 Subpart WWWWWW Applicability: The horizontal, open tank~~, and the vertical, closed tank~~ pretreatment line~~s~~ ~~are~~ is classified as existing, plating and polishing facilities and shall comply with applicable provisions of 40 CFR 63 Subpart WWWWWW.

An affected source is existing if construction or reconstruction of the affected source commenced on or before March 14, 2008.

[40 CFR 63.11511(def); 40 CFR 63.11504(a)(1)(iii), (a)(2), & (a)(3), 40 CFR 63.11505(b)]

B.11. Affected Sources- Pretreatment Tanks Containing Chromium: The provisions of 40 CFR 63 Subpart WWWWWW applies to each new or existing affected source, as specified below, at all times.

- Each tank that contains one or more of the plating and polishing metal HAP and is used for other non-electrolytic metal coating operations, such as chromate conversion coating.

[40 CFR 63.11505(a)(1)]

B.12. NESHAP, 40 CFR 63 Subpart WWWWWW - Compliance Date: The owner or operator shall comply with the applicable provisions of 40 CFR 63 Subpart WWWWWW no later than July 1, 2010.

[40 CFR 63.11506(a)]

Management Practices

B.13. Pretreatment Tanks Containing Chromium: The following applicable management practices shall be implemented at each plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP, as practicable.

(1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.

(2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.

(3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.

(4) Use tank covers, if already owned and available at the facility, whenever practicable.

(5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).

(6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.

(7) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.

(8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.

(9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.

Specific Condition B.13. Continued:

(10) Minimize spills and overflow of tanks, as practicable.

(11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.

(12) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

[40 CFR 63.11507(g)]

Compliance Requirements

B.14. Compliance Requirements - Pretreatment Tanks Containing Chromium

(a) Notification of Compliance Status: The owner or operator shall submit a Notification of Compliance Status in accordance with §63.11509(b) of "What are my notification, reporting, and recordkeeping requirements?"

(b) Management Practices & Equipment Standards: The owner or operator shall be in compliance with the applicable management practices and equipment standards in 40 CFR 63 Subpart WWWWWW at all times.

(c) Continuous Compliance: To demonstrate continuous compliance with the applicable management practices and equipment standards specified in this subpart, the owner or operator shall satisfy the requirements specified in following paragraphs :

(1) Operate and Maintain Affected Source: You must always operate and maintain your affected source, including air pollution control equipment.

(2) Annual Compliance Certification: You must prepare an annual compliance certification according to the requirements specified in §63.11509(c), "Notification, Reporting, and Recordkeeping," and keep it in a readily-accessible location for inspector review.

(3) Continuous Compliance Demonstration: The owner or operator shall demonstrate continuous compliance according to paragraphs (3)(i) and (ii) of this Condition.

(i) You must implement the applicable management practices during all times that the affected tank or process is in operation.

(ii) You must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.

[40 CFR 63.11505(a)(1); 40 CFR 63.1108(a), (b), (d)(1),(d)(2), (d)(8)]

Notification, Reporting, and Recordkeeping Requirements

B.15. Pretreatment Tanks Containing Chromium

(a) Initial Notification: The owner or operator shall submit an Initial Notification in accordance with paragraphs (a)(1) through (4) of this Condition by the dates specified.

(1) The Initial Notification must include the information specified in §63.9(b)(2)(i) through (iv) of the General Provisions of this part.

(2) The Initial Notification must include a description of the compliance method (e.g., use of wetting agent/fume suppressant) for each affected source.

(3) If you start up your affected source on or before July 1, 2008, you must submit an Initial Notification not later than 120 calendar days after July 1, 2008.

(4) If you start up your new affected source after July 1, 2008, you must submit an Initial Notification not later than 120 calendar days after you become subject to this subpart.

(b) Notification of Compliance Status: The owner or operator shall submit a Notification of Compliance Status in accordance with paragraphs (b)(1) and (2) of this Condition.

(1) The Notification of Compliance Status must be submitted before the close of business on the compliance date specified in §63.11506 (July 1, 2010)

(2) The Notification of Compliance Status must include the items specified in paragraphs (b)(2)(i) through (iv) of this Condition.

(i) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources.

(ii) Methods used to comply with the applicable management practices and equipment standards.

(iii) Description of the capture and emission control systems used to comply with the applicable equipment standards.

(iv) Statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements.

(c) Annual Certification: The owner or operator shall prepare an annual certification of compliance report according to following paragraphs. These reports do not need to be submitted unless a deviation from the requirements of this subpart has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report.

(1) The owner or operator shall state in your annual compliance certification that you have implemented the applicable management practices, as practicable.

Specific Condition B.15. Continued:

(2) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

(d) Deviations: If any deviations from the compliance requirements specified in 40 CFR 63 Subpart WWWWWW occurred during the year, you must report the deviations, along with the corrective action taken, and submit this report to the delegated authority.

(e) You must keep the records specified in paragraphs (e)(1) through (3) of this Condition.

(1) A copy of any Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications.

(2) The records specified in §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of this part.

(3) The records required to show continuous compliance with each management practice and equipment standard that applies to you, as specified in §63.11508(d), "What are my compliance requirements?"

(f) You must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1) of the General Provisions to part 63. You may keep the records offsite for the remaining 3 years.

[40 CFR 63.11506(a), 40 CFR 63.11509(a),(b),(c)(6),(c)(7),(d),(e),(f)]

Other Requirements and Information

B.16. General Provisions. The owner or operator shall comply with the requirements of the General Provisions (40 CFR part 63, subpart A) according to Table 1 of this subpart.

Table 1 to Subpart WWWWWW of Part 63.

Applicability of General Provisions to Plating and Polishing Area Sources

Citation	Subject
63.1	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.6(a), (b)(1)–(b)(5), (c)(1), (c)(2), (c)(5), (j)	Compliance with standards and maintenance requirements.
63.10(a), (b)(1), (b)(2)(i)–(iii),(xiv), (b)(3), (d)(1), (f)	Recordkeeping and reporting.
63.12	State authority and delegations.
63.13	Addresses of State air pollution control agencies and EPA regional offices.
63.14	Incorporation by reference.
63.15	Availability of information and confidentiality.

[40 CFR 63.11510, Table 1 to Subpart WWWWWW of Part 63]

This permit makes the changes identified below with strikethrough and underline font to Conditions 3., 3., and 4. of Section 3. –Facility-Wide Conditions section of Permit No. 1090447-012-AF:

2. Facility Wide VOC Emissions Cap: The total maximum allowable facility wide VOC emissions from all operations at the facility shall not exceed 95.0 tons per any 12-consecutive month period.

   Compliance with the VOC emissions cap shall be demonstrated, by the recordkeeping requirements of Facility-wide Condition 4, with all valid VOC emissions data including, but not limited to solvent ~~and coating~~ storage, cleanup, fugitive emissions, ~~VOC emissions from the Surface Coating Operations/Paint line Operations (EU 001),~~ VOC emissions from the Holding Furnace (EU 003), VOC emissions from the Remelt Furnace (EU 004), VOC Emissions from the Nos. 1 and 2 Homogenizing Furnaces (EU 005), and VOC emissions from the emissions units and pollutant emitting activities that meet an exemption from air permitting pursuant to Rule 62-210.300(3), F.A.C.

   VOC emissions shall be based on the premise that all VOCs applied or used are emitted to the atmosphere.

   [Application No. 1090447-012-AF; Rule 62-4.070(3), F.A.C; Rule 62-210.200, F.A.C.(PTE)]

3. Facility Wide HAP Emissions Caps: The total maximum allowable facility wide Hazardous Air Pollutant (HAP) emissions from all operations at the facility shall be limited to less than 25.0 tons per any 12-consecutive month period for all HAPs totaled, and less than 10.0 tons per any 12-consecutive month period for any individual HAP.

   Compliance with the HAP emissions caps shall be demonstrated, by the recordkeeping requirements of Facility-wide Condition 4, with all valid HAP emissions data including, but not limited HAP emissions from ~~the Surface Coating Operations/Paint line Operations (EU 001),~~ HAP emissions from the Holding Furnace (EU 003), HAP emissions from the Remelt Furnace (EU 004), HAP Emissions from the Nos. 1 and 2 Homogenizing Furnaces (EU 005), and HAP emissions from the emissions units and pollutant emitting activities that meet an exemption from air permitting pursuant to Rule 62-210.300(3), F.A.C.

   [Application No. 1090447-012-AF; Rule 62-4.070(3), F.A.C; Rule 62-210.200, F.A.C.(PTE)]

4. Facility Wide VOC and HAP Emissions Caps -Recordkeeping: The owner or operator shall maintain a record of the facility-wide VOC and HAP emissions on monthly basis.

   The owner or operator shall also maintain a record of the facility-wide VOC and HAP emissions on a 12 month rolling basis. The latest monthly VOC and HAP emissions shall be added to the VOC and HAP emissions from the previous 11 consecutive months in order to continuously demonstrate that the facility is meeting the stated facility-wide VOC and HAP emissions caps.

   All supporting information, documentation, and records used to compute the facility-wide VOC and HAP emissions shall be maintained onsite at the facility in a permanent form suitable for Department inspection for at least three years from the date the data is recorded. This includes, but it not limited to methods, calculations, formulas, product name, density, VOC content, and HAP content. These records and materials shall be made available to the Department or federal air pollution agency upon request.

Facility-Wide Condition 4 Continued:

The owner or operator shall maintain the following information to determine the facility-wide VOC and HAP emissions:

- The type, quantity in gallons, and weight in pounds, of each VOC and/or HAP containing material used each calendar month,
- The VOC content by weight (in pounds per gallon) of each VOC containing material used shall be determined using supplier data (MSDS sheets, as supplied data sheets, EPA Method 24, etc.),
- The HAP content by weight (in pounds per gallon) of each HAP containing material used shall be determined using supplier data (MSDS sheets, as supplied data sheets, EPA Method 24, etc.),
- Beginning and ending inventories of VOC containing materials (usage and VOC content) each calendar month and the amount of VOC containing materials purchased during each calendar month as documented through purchase receipts, records and sales receipts. Compliance with the VOC emissions cap shall be based upon these monthly materials use inventories,
- Beginning and ending inventories of HAP containing materials (usage and HAP content) each calendar month and the amount of HAP containing materials purchased during each calendar month as documented through purchase receipts, records and sales receipts. Compliance with the HAP emissions cap shall be based upon these monthly materials use inventories,
- The type, quantity in gallons, and weight in pounds, of solvent removed from the facility in the liquid phase as waste or returns (i.e. still bottoms, rejected solvent) each calendar month[1],
- VOC and HAP emissions from Emissions Units ~~001,~~ 003, 004, and 005,
- VOC emissions from activities exempt from air permitting pursuant to Rule 62 -210.300(3)(a), F.A.C. or Rule 62-210.300(3)(b)1., F.A.C.,
- The amount of VOCs emitted each calendar month expressed in pounds and tons,
- The rolling 12-month total of VOCs emitted in tons.
- The amount of individual and total HAPs emitted each calendar month expressed in pounds and tons,
- The rolling 12-month total of individual and total HAPs emitted in tons.

[1] Emissions may be adjusted each month for VOC content of material removed from the facility in the liquid phase as waste or returns. When determining the VOC emissions from disposed still bottoms, the owner or operator shall use a VOC content of 42% by weight.[2]

[2] Based on laboratory analysis results dated July 14, 2012

[Application No. 1090447-012-AF, Rule 62-4.070(3), F.A.C., Rule 62-4.160(14)(b), F.A.C., Rule 62-210.370(1),F.A.C.]