



Florida Department of Environmental Protection

Central District Office
3319 Maguire Blvd., Ste. 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Hershel T. Vinyard, Jr.
Secretary

Electronically Sent- Received Receipt Requested
Roberta.Molignaro@hydro.com

Mr. Keith Jones, VP Operations
Hydro Aluminum Precision Tubing NA, LLC
100 Gus Hipp Blvd.
Rockledge, FL 32955

Re: Project No. 0090078-006-AF
Hydro Aluminum Rockledge
Federally Enforceable State Operating Permit (FESOP)
Project: FESOP Renewal and Revision

Dear Mr. Jones:

On October 01, 2010, you submitted an application requesting renewal and revision of Air FESOP No. 0090078-004-AF to incorporate the terms and conditions of Minor Source Air Construction Permit No. 0090078-005-AC. This facility is located in Brevard County at 100 Gus Hipp Blvd. in Rockledge, Florida. Enclosed are the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit and Appendices; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Natrevia Gradney, at 407.893.3334, ext. 2369.

Sincerely,

Caroline D. Shine
District Air Program Administrator
Central District

Enclosures

CDS/ng/ta

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Hydro Aluminum Precision Tubing NA, LLC
100 Gus Hipp Blvd.
Rockledge, FL 32955

Project No. 0090078-006-AF
Federally Enforceable State
Operating Permit (FESOP)
Brevard County, Florida

Authorized Representative:

Mr. Keith Jones, VP Operations

Hydro Aluminum Rockledge
Project: FESOP Renewal and
Revision

Facility Location: Hydro Aluminum Precision Tubing NA, LLC operates the existing Hydro Aluminum Rockledge, which is located in Brevard County at 100 Gus Hipp Blvd. in Rockledge, Florida.

Project: The applicant proposes to renew and revise Air FESOP No. 0090078-004-AF to incorporate the terms and conditions of Minor Source Air Construction Permit No. 0090078-005-AC. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Management Section in the Central District Office. The Permitting Authority's physical address is: 3319 Maguire Blvd., Ste. 232, Orlando, Florida 32803-3767. The Permitting Authority's mailing address is: 3319 Maguire Blvd., Ste. 232, Orlando, Florida 32803-3767. The Permitting Authority's telephone number is 407/893-3334.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged,

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Orange County, Florida.



Caroline D. Shine
District Air Program Administrator
Central District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft 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 2/3/11 to the persons listed below.

Mr. Keith Jones, VP Operations, Hydro Aluminum Precision Tubing NA, LLC
(Roberta.Molignaro@hydro.com)

Mr. Thomas Cozzie, T. Cozzie Consulting, Inc. (tcozzie@tcozzie.com)

Mr. Keith Cole, P.E., KC Environmental & Engineering (keith.cole@mindspring.com)

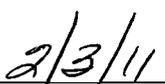
WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Clerk Stamp

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



(Clerk)



(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Air Resource Management, Central District Office
Draft Federally Enforceable State Operation Permit (FESOP)
Project No. 0090078-006-AF
Hydro Aluminum Precision Tubing NA, LLC, Hydro Aluminum Rockledge
Brevard County, Florida

Applicant: The applicant for this project is Hydro Aluminum Precision Tubing NA, LLC. The applicant's authorized representative and mailing address is:

Mr. Keith Jones, VP Operations
Hydro Aluminum Precision Tubing NA, LLC
Hydro Aluminum Rockledge
100 Gus Hipp Blvd.
Rockledge, FL 32955

Facility Location: Hydro Aluminum Precision Tubing NA, LLC operates the existing Hydro Aluminum Rockledge, which is located in Brevard County at 100 Gus Hipp Blvd. in Rockledge, Florida.

Project: The purpose of this project is to renew and revise Air FESOP No. 0090078-004-AF to incorporate the terms and conditions of Minor Source Air Construction Permit No. 0090078-005-AC. Emission unit (EU) No. 006, Mineral Spirits Mist Spray and Recycling System, and its associated manufacturing process have been permanently removed from operation. With the removal of EU 006, the facility's potential emissions have changed from 41.11 tons/yr to 6.11 tons/yr.

Permitting Authority: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Management Section in the Central District Office. The Permitting Authority's physical address is: 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767. The Permitting Authority's mailing address is: 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767. The Permitting Authority's telephone number is 407/894-7555.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site:
<http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air Federally Enforceable State Operating permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed

equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the

filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Hydro Aluminum Precision Tubing NA, LLC
100 Gus Hipp Blvd.
Rockledge, FL 32955

Hydro Aluminum Rockledge

Facility ID No. 0090078

PROJECT

Project No. 0090078-006-AF
Application for Federally Enforceable State Operation Permit Renewal and Revision
Project Name: FESOP Renewal and Revision

COUNTY

Brevard County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

January 12, 2011.

Prepared by Natrevia Gradney

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control - General Provisions); 62-210 (Stationary Sources - General Requirements); 62-212 (Stationary Sources - Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources - Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Mr. Keith Jones, VP Operations
Hydro Aluminum Precision Tubing NA, LLC
100 Gus Hipp Blvd.
Rockledge, FL 32955

B. Professional Engineer:

Mr. Keith Cole, P.E.
KC Environmental & Engineering
447 Woodruff Crossing
Woodstock, GA 30189

Company Name: Hydro Aluminum Precision Tubing NA, LLC
Plant Name: Hydro Aluminum Rockledge
Revision

Project No. 0090078-006-AF
Project Name: FESOP Renewal and

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

C. Project Location:

Hydro Aluminum Rockledge
100 Gus Hipp Blvd.
Rockledge, FL 32955

D. Project Summary:

The purpose of this project is to renew and revise Air FESOP No. 0090078-004-AF to incorporate the terms and conditions of Minor Air Construction Permit No. 0090078-005-AC. Emission unit (EU) No. 006, Mineral Spirits Mist Spray and Recycling System, and its associated manufacturing process have been permanently removed from operation. With the removal of EU 006, the facility's potential emissions have changed from 41.11 tons/yr to 6.11 tons/yr. The applicant has requested to keep the same limits of the previous Air FESOP No. 0090078-004-AF.

E. Application Information:

Application Received on: 10/01/10
Additional Information Requested on: 10/19/10
Additional Information Received on: 11/10/10
Application Complete: 11/10/10

II. PSD Applicability for Project

As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table A. Potential Emissions (Tons/Year) and PSD Applicability

| Pollutant | Project Potential Emission (tpy) | Significant Emissions Rate (tpy) | Subject to PSD? |
|-----------|----------------------------------|----------------------------------|-----------------|
| VOC | 6.11 | 40 | No |

As shown in the above table, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

III. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

| Subject to: | Y/N | Comments |
|--|------------|--|
| Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C. | Y | Not exempt from general permitting requirements. |
| Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration | N | Facility is not a PSD major source. |
| Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards | Y | Surface coating operations could be a source of unconfined particulate matter emissions. |
| Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor) | Y | Surface coating operations are a source of VOC and odors. |
| Rule 62-296.400, F.A.C. - Stationary Source Emission Standards | N | There is no applicable source category. |
| Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC) | N | Brevard County is an attainment area for ozone. |
| Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM) | N | There is no applicable source category. |
| Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS) | N | There is no applicable source category. |
| Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS - 40 CFR 61) | N | There is no applicable source category. |
| Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS - 40 CFR 63) | N | There is no applicable source category. |
| Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution | N | Facility is a synthetic non-Title V source. |
| Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C. | Y | Annual VE testing is required for both EU 007 and 008. |

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

IV. Summary of Emissions

| Pollutant | EU No. and brief description | Potential Emissions (tpy) | Allowable Emissions (tpy) |
|-----------|---|---------------------------|---------------------------|
| VOC | 007- Surface Coating Line No. 1 w/ Thermal Oxidizer | 2.51 | |
| | 008- Surface Coating Line No. 2 w/ Thermal Oxidizer | 3.31 | |
| | Miscellaneous Activities | 0.29 | |
| | Facility Total | 6.11 | 50 |

V. Federal NSPS and/or NESHAP Provisions

This facility is not subject to 40 CFR 63, Subpart RRR- Secondary Aluminum Production. *Aluminum extrusion facilities are not considered to be secondary aluminum production facilities if the only materials they melt are clean charge, customer returns, or internal scrap, and they do not operate sweat furnaces, thermal chip dryers, or scrap dryers/delacquering kilns/decoating kilns. The facility only melts raw aluminum billets which are considered clean charge by definition.*

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District Office, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767, 407-893-3334.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit for the aforementioned air pollution sources in accordance with the draft permit and its conditions as stipulated (see attached).



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

Electronically Sent- Received Receipt Requested

Roberta.Molignaro@hydro.com

DRAFT PERMIT

PERMITTEE

Hydro Aluminum Precision Tubing NA, LLC
100 Gus Hipp Blvd.
Rockledge, FL 32955

Authorized Representative:

Mr. Keith Jones, VP Operations

Air Permit No. 0090078-006-AF

Permit Expires: 01/31/2016

Site Name : Hydro Aluminum Rockledge
Federally Enforceable State Operating
Permit (FESOP)

Project Name: FESOP Renewal and
Revision

This is the final air operation permit, which authorizes renewal and revision of Air FESOP No. 0090078-004-AF to incorporate the terms and conditions of Minor Source Air Construction Permit No. 0090078-005-AC. The work is conducted at Hydro Aluminum Rockledge (Standard Industrial Classification No. 3354). The facility is located in Brevard County at 100 Gus Hipp Blvd. in Rockledge, Florida. The UTM coordinates are Zone 17, 528.61 km East, and 3131.0 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and 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 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 Orange County, Florida

DRAFT

Caroline Shine Effective Date
District Air Program Administrator
Central District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) 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 _____ to the persons listed below.

Mr. Thomas Cozzie, T. Cozzie Consulting Inc. (tcozzie@tcozzie.com)

Mr. Keith Cole, P.E., KC Environmental & Engineering (keith.cole@mindspring.com)

Clerk Stamp

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

DRAFT

(Clerk) (Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

Hydro Aluminum Rockledge

The facility manufactures extruded aluminum tubing used in parts for the automotive industry. The operations at the facility consist of surface coating operations (Line Nos. 1 and 2). Multi-port extrusion (MPE) tube is delivered to each line by being unwound from large coils. After coating application, heated drying, water quench, and forced air drying, the coated tube is rewound onto spools. Volatile organic compound (VOC) emissions from each line are vented to separate Epcor thermal oxidizers with a destruction efficiency of 95 percent or greater.

The existing facility consists of the following emissions units.

| | |
|-------------------------|---|
| Facility ID No. 0090078 | |
| ID No. | Emission Unit Description |
| 007 | Surface Coating Line No. 1 w/ Thermal Oxidizer (control device) |
| 008 | Surface Coating Line No. 2 w/ Thermal Oxidizer (control device) |

Project Description

The purpose of this project is to renew and revise Air FESOP No. 0090078-004-AF to incorporate the terms and conditions of Minor Air Construction Permit No. 0090078-005-AC. Emission unit No. 006, Mineral Spirits Mist Spray and Recycling System, and its associated manufacturing process have been permanently removed from operation.

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

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 not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for volatile organic compounds (VOCs), Total HAPs, and individual HAPs.

PERMIT HISTORY/AFFECTED PERMITS

Replaces FESOP No. 0090078-004-AF;
Incorporate terms and conditions of Construction Permit 0090078-005-AC

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. **Permitting Authority:** The permitting authority for this project is the Florida Department of Environmental Protection (Department), Central District's Air Resource Management Section. The Central District's mailing address and phone number is:

Florida Department of Environmental Protection
Central District Office
Air Resource Management Section
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767
Telephone: 407-893-3333

All documents related to applications for permits shall be submitted to the above address.

2. **Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Office's Air Resource Management Section (see above mailing address and phone number).
3. **Appendices:** The following Appendices are attached as part of this permit:
- Appendix A. Citation Formats and Glossary of Common Terms;
 - Appendix B. General Conditions;
 - Appendix C. Common Conditions; and
 - 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. **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.]
6. **Modifications:** Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]
7. **Annual Operating Report:** On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance

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with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.

[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:

- a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
- b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and
- c. copies of the most recent two months of records/logs specified in Specific Condition No. A.14.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU. Nos. 007 and 008- Surface Coating Operations (Line Nos. 1 and 2)

This section of the permit addresses the following emissions units.

| ID No. | Emission Unit Description |
|--------|---|
| 007 | Surface coating Line No. 1 applies Nocolok Flux or Zinc Flux coating to the aluminum extrusions. Emissions from solvent (acetone) cleaning activities are vented through a carbon filtration system. |
| 008 | Surface coating Line No. 2 applies Silicon Flux coating to the aluminum extrusions using roll coaters housed in permanent total enclosure. Emissions from the roll coating applicator room and drying oven are exhausted to the thermal oxidizer. |

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum permitted capacity for coating material used shall not exceed the following:

| ID No. and Description | Coating Mixture Applied (lbs/day) |
|---------------------------------|-----------------------------------|
| 007- Surface Coating Line No. 1 | 300 |
| 008- Surface Coating Line No. 2 | 693 |

[Rule 62-210.200(PTE), F.A.C.; Construction Permit 0090078-005-AC]

A.2. Authorized Fuel: The permittee is authorized to fire the drying oven and thermal oxidizers using natural gas only.

[Rule 62-210.200(PTE), F.A.C.; Construction Permit 0090078-005-AC]

A.3. Restricted Operation: The permittee shall comply with the following:

- a. The hours of operation are not limited (8760 hours per year).
- b. Each coating line shall operate only when the thermal oxidizer is operating.

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit 0090078-005-AC]

EMISSIONS STANDARDS

A.4. Emission Limitations: The VOC and HAP emission operation limits for this emission unit are as follows:

| Pollutant | Emission Limits (tons/any consecutive 12 month period) |
|--|--|
| Total Volatile Organic Compounds (VOCs) | less than 50.0 |
| Total Hazardous Air Pollutants (HAPs) | less than 25.0 |
| Individual Hazardous Air Pollutants (HAPs) | less than 10.0 |

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[Rules 62-210.200(PTE) and 62-210.300(2)(a)1, F.A.C.; FESOP 0090078-004-AF]

A.5. General Visible Emissions (VE) Limitation: Visible emissions are limited to less than 20 percent opacity.

[Rule 62-296.320(4)(b)1. F.A.C.; Construction Permit 0090078-005-AC]

A.6. Unconfined Emissions of Particulate Matter: All reasonable precautions shall be taken to prevent emissions of unconfined particulate matter. Reasonable precautions shall include, but are not limited to, the following:

- a. Paving and maintenance of road, parking areas, and yards;
- b. Application of water or chemicals, when necessary, to control emissions;
- c. Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent re-entrainment and from buildings or work areas to prevent particulate from becoming airborne;
- d. Landscaping or planting of vegetation;
- e. Use of hoods, fans, filters and similar equipment to contain, capture, and/or vent particulate matter; and

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

A.7. VOC or Organic Solvents (OS) Emissions: The permittee shall not 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. Pursuant to Rule 62-296.320(1)(a), F.A.C., the following procedures shall be utilized to minimize pollutant emissions:

- a. Maintain tightly fitting cover, lids, etc. on all containers of VOC when they are not being handled, tapped, etc.
- b. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc. of VOC so that it can be covered when not in use.
- c. All equipment, fittings, valve lines, pipes, drums, etc. shall be properly operated and maintained.
- d. Prevent excessive air turbulence across exposed VOCs.
- e. All VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

[Rule 62-296.320(1), F.A.C.]

TESTING REQUIREMENTS

A.8. Compliance Tests: At least 90 days prior to the expiration date of this permit, the destruction efficiency of each thermal oxidizer shall be demonstrated by determining the inlet and outlet VOC emissions. For each thermal oxidizer, the testing shall consist of three (3) runs of one (1) hour duration each. The inlet VOC quantity and outlet VOC quantity shall be measured **simultaneously**. The following values shall be determined as specified:

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU. Nos. 007 and 008- Surface Coating Operations (Line Nos. 1 and 2)

- a. The inlet VOC quantity shall be determined using EPA Method 25A, EPA Method 1, and EPA Method 2.
- b. The outlet VOC quantity shall be determined by using EPA Method 25A, EPA Method 1, and EPA Method 2.
- c. The destruction efficiency of the oxidizer shall be at least 90 percent.
- d. The oxidizer temperature shall be reported.
- e. Visible emissions opacity shall be determined by DEP Method 9.

[Rule 62-4.070(3), F.A.C.; Construction Permit 0090078-005-AC]

A.9. **Test Requirements:** Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rule 62-297.310, F.A.C.]

A.10. **Test Method(s):** Required tests shall be performed in accordance with the following reference method(s).

| Method | Description of Method and Comments |
|---------|--|
| EPA 1 | Sample and Velocity Traverses for Stationary Sources |
| EPA 2 | Determination of Stack Gas Velocity and Volumetric Flow Rate |
| DEP 9 | Visual Determination of the Opacity of Emissions from Stationary Sources |
| EPA 25A | Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer |

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.

[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

A.11. **Thermal Oxidizer Temperature:** The thermal oxidizers shall be operated at a minimum temperature of 1400°F and a minimum residence time of 1.0 second in the combustion chamber. The permittee shall monitor and record the following:

- a. Visually inspect the temperature monitoring/alarm system at least once a day for each day the coating lines are in operation to ensure that the monitoring/alarm system and the coating lines are operating properly.
- b. Record the temperature in each thermal oxidizer near the combustion chamber outlet on a continuous basis, in a manner and with instrumentation acceptable to the Department.

[Rule 62-4.070(3), F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU. Nos. 007 and 008- Surface Coating Operations (Line Nos. 1 and 2)

NOTIFICATION REQUIREMENTS

- A.12. Test Notification: The permittee shall notify the Compliance Authority, 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 and operator.
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

- A.13. Test 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.]

- A.14. Recordkeeping: In order to demonstrate compliance with Specific Condition Nos. A.1., A.2., A.3., and A.4., the permittee shall maintain daily records of production and monthly records to support the VOC/HAP usage and emissions. At a minimum, the logs shall contain the following:

a. Daily Records

- 1) Date (Month/Day/Year);
- 2) Total coating mixture applied for each coating line (in pounds);
- 3) Total daily hours of operation of each coating line;
- 4) Total daily hours of operation of the thermal oxidizer; and
- 5) Daily average application rate of each coating line (pounds/day).

b. Monthly Records

- 1) Date (Month and Year);
- 2) The usage of all solvents/coatings containing VOCs and HAPs (Usage must be supported by supporting documentation);
- 3) The total VOC content and total HAP content of each solvent/coating;
- 4) The density of each solvent/coating;
- 5) The total of VOC/HAP emissions for each month;
- 6) The cumulative 12-month running total of VOC/HAP emissions to ensure the annual VOC/HAP emission limits are not exceeded; and
- 7) Fuel records relating to General Condition 14.c. in Appendix B (General Conditions).

Supporting documentation may be comprised of "As Supplied" sheets, MSDS sheets, EPA data sheets, purchase orders, waste shipment/disposal records, etc. that includes information to determine VOC and HAP emissions.

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All records shall include the Facility Name, Facility ID (0090078), Emission Unit ID, Source Description(e.g., EU 007 - Surface Coating Line No. 1), and the Date. Daily records shall be completed within three (3) business days. Monthly records shall be completed by the end of the following month.

[Rule 62-4.070(3), F.A.C.]

- A.15. Record Retention: The records required in Specific Condition No. A.14. shall be recorded in a permanent form suitable for inspection by the Department upon request. The records shall be maintained onsite for a minimum of five (5) years.

[Rules 62-4.070(3), 62-210.300(2)(b)1.e F.A.C.]