

**PERMITTEE:**

Mr. Lars Bogren  
President  
Kanthal Palm Coast  
1 Commerce Blvd.  
Palm Coast, Florida 32135-2440

I.D. Number: 0350011  
Permit/Cert Number: 0350011-006-AF  
Date of Issue: February 24, 2003  
Expiration Date: February 24, 2008  
County: Flagler  
Latitude/Longitude: 29°33'08"N; 81°15'44"W  
UTM: E-(17)474.60; N-3269.00  
Project: Coated Wire Facility  
**FESOP**

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-204, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

**Project:**

**This facility is currently classified as a Title V source due to potential emissions of hazardous air pollutants (HAPs) being greater than the major source threshold of 10 ton per year (individual basis) and 25 ton per year (total combined). The facility has requested the following facility-wide emissions caps: for total VOC <50 TPY, single HAPs <10 TPY and total HAPs <25 TPY. Upon issuance of this FESOP, the requested emission limitations will become federally enforceable and the facility will be classified as a Synthetic Non-Title V source.**

**Facility Description:**

For the operation of a wire coating facility that coats small diameter precision wire. Production consists of four main operations: wire drawing, annealing, enameling and milling with ancillary operations such as etching and die cleaning. This facility emits VOC (Volatile Organic Compound) and HAP emissions from various activities.

Emission Units are identified as follows:

Emission Unit Number	Description	Emissions Point Number
001	<b>Scrubber No. 1</b> Machines: G-01 through G-08 and D-08 <b>Scrubber No.7</b> Machines: G-09 through G-20	02

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Emission Units are identified as follows:

Emission Unit Number	Description	Emissions Point Number
001	<p align="center"><b>Scrubber No. 2</b>            Machines: T-01 through T-05; L-08 &amp; L-02;            S-01 through S-06</p> <p align="center"><b>Scrubber No. 3</b>            Machines: L-03 through L-11;</p> <p align="center"><b>Scrubber No. 4</b>            Machines: D-01 through D-07</p>	03
001	<p align="center"><b>Scrubber No. 5</b>            Machines: D-09B through D-13B</p>	04
001	<p align="center"><b>Scrubber No. 6</b>            Machines: D-14 through D-16 and L-12 through            L-17</p>	03
001	<p align="center"><b>Scrubber No. 8</b>            Machines: N-01 through N-03</p>	05

Insignificant emission unit(s): **1 MAG Machine M-01**, with a catalytic burner to control emissions.  
**1 - 4.5 KW Electric steam boiler.**

**Regulatory Classification:**

This facility is subject to regulation under: Rule 62-296.320(1)(a), F.A.C. – VOC Emissions

**Operating Location:**

Located west of I-95, south on US 1 to 1 Commerce Boulevard, Palm Coast, Flagler County, Florida.

**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:

- Modification construction application received 05-21-01
- Application For Air Permit - Long Form received 11-13-02

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**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys not title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permitted to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - a. Have access to and copy any record that must be kept under the conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. a description of and cause of non-compliance; and

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- b. the period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Compliance with New Source Performance Standards (NSPS)

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14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
  - the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurement;
  - the dates analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

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**SPECIFIC CONDITIONS:**

**ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS**

- The I.D. No. and Project name for this source shall be used on all correspondence.
- Hours of Operation:** The hours of operation are not restricted, 24 H/D; 7 D/W; 52 W/Y (8,760 H/Y).  
 [Rule 62-210.200(PTE), F.A.C., Definitions- Potential to Emit (PTE)]

**EMISSION LIMITATIONS AND PERFORMANCE STANDARDS**

- Maximum Allowable Emission Rate:** The permitted maximum allowable emission rate for each pollutant is as follows:

HAP No.	MATERIAL	RATE GAL/YR	POLLUTANT	Emissions Limit		FAC RULE	TEST METHOD
				LBS/HR	TPY		
H049			Cresols		9.99 <sup>1</sup>	--- <sup>1,1</sup>	--- <sup>2</sup>
H186			Xylenes		9.99 <sup>1</sup>	--- <sup>1,1</sup>	--- <sup>2</sup>
H051			m-Cresols		9.99 <sup>1</sup>	--- <sup>1,1</sup>	--- <sup>2</sup>
H052			p-Cresols		9.99 <sup>1</sup>	--- <sup>1,1</sup>	--- <sup>2</sup>
H075			Dimethyl phthalate		9.99 <sup>1</sup>	--- <sup>1,1</sup>	--- <sup>2</sup>
H144			Phenol		9.99 <sup>1</sup>	--- <sup>1,1</sup>	--- <sup>2</sup>
H053			Cumene		9.99 <sup>1</sup>	--- <sup>1,1</sup>	--- <sup>2</sup>
H085			Ethyl Benzene		9.99 <sup>1</sup>	--- <sup>1,1</sup>	--- <sup>2</sup>
H169			Toluene		9.99 <sup>1</sup>	--- <sup>1,1</sup>	--- <sup>2</sup>
H120			Methyl Ethyl Ketone		9.99 <sup>1</sup>	--- <sup>1,1</sup>	--- <sup>2</sup>
---			<b>Total HAP</b>		<25 <sup>3</sup>		--- <sup>2</sup>
---			<b>Total VOC</b>		<50 <sup>4</sup>		--- <sup>2</sup>
All above			Objectionable Odors	None <sup>5</sup>		62-296.320(2)	

<sup>1</sup>Self-imposed limit to escape 112(g) Case-by-Case MACT applicability, no individual HAP will be emitted over 9.99 TPY.

<sup>1,1</sup>On 06-18-97 Rule 62-204.800(10)(d)2., F.A.C. adopted Section 112(g) that amended 40 CFR 63 Subpart 63.

<sup>2</sup>**HAP compliance** shall be determined by recording all of the data required to document the TPY of each HAP and TPY of total HAPs.

<sup>3</sup>Self-imposed limit to escape 112(g) Case-by-Case MACT applicability, no combination of HAPs will be emitted over 24.99 TPY.

<sup>4</sup>Estimate in the application is <50 TPY and is the basis for the fee.

<sup>5</sup>Beyond property line.

- VOC Emissions:** Procedures to minimize VOC emissions shall include, but not limited to:
  - Maintain tightly fitting cover, lids, etc. on all containers of VOC when they are not being handled, tapped, etc.
  - 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.
  - All fittings, valves, lines, etc. shall be properly maintained.
  - All VOC spills shall be attended to immediately and the materials properly disposed of, recycled, etc.
  - Maintain a monthly accounting of the VOC per type such that the beginning inventory and deliveries are accounted for.

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

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5. **Objectionable Odor:** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.  
[Rule 62-296.320(2), F.A.C., Objectionable Odor Prohibited; and, Rule 62-210.200(181), F.A.C., Definitions-Objectionable Odor]

#### **Record keeping**

6. **Record keeping:** A report containing the HAPs material usage and emissions shall be maintained and submitted on a calendar quarter basis for one year. If compliance with the requested HAPs cap is ensured after a year, then the subsequent reports shall be submitted semiannually. The report shall be signed by the facilities manager.  
[Rule 62-4.070(3), F.A.C. – Reasonable Assurance]

#### **COMPLIANCE MONITORING AND TESTING REQUIREMENTS**

7. **Excess Emissions:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]
8. **Excess Emissions:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.  
[Rule 62-210.700(6), F.A.C.]

#### **ADMINISTRATIVE**

9. **Annual Operation Report:** A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year on or before March 1 of the following year and submitted to the air compliance section of this office. **The report shall also include, at a minimum, the information required in Specific Conditions No. 3.**  
[Rule 62-4.070(3), F.A.C.]
10. Any revision(s) to the permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.
11. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.  
[Rule 62-4.130, F.A.C., Plant Operation-Problems]

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12. A completed **Application for Non-Title V Air Permit Renewal** shall be submitted to the Department at least 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.

[Rule 62-4.055, F.A.C.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

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Christopher L. Kirts, P.E.  
District Air Program Administrator