Florida Department of Environmental Protection

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PERMITTEE:

Kanthal Palm Coast
1 Commerce Blvd
Palm Coast, Florida 32164

I.D. Number:	0350011
Permit/Cert Number:	0350011-011-AC
Date of Issue:	
Expiration Date:	
County:	Flagler
Latitude/Longitude:	29°33′08″N; 81°15′44″W
UTM:	E- (17) 474.60; N-3269.00
Project:	Enameling Oven Installation

Draft

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-272, 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 011:

For the installation of an Aumann DLH 6-80-160 enameling oven. The new enameling oven will increase the annual solvent usage rate of the facility from 163 tons to approximately 187 tons. The emissions from the oven will be controlled by the Regenerative Thermal Oxidizer (RTO).

FACILITY DESCRIPTION

This is 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.

The manufacturing building is considered as Permanent Total Enclosure as long as it meets the criteria as described in EPA Method 204. Permanent Total Enclosure is defined as a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge to a control device. The enclosure shall be in negative pressure as an indication that the airflow is not exhaust out of the enclosure and all the VOC emissions are assumed to be 100% captured and vented to RTO for destruction.

The RTO is sized at 12,000 SCFM and is equipped with a variable frequency drive motor that allows the flow rate to be automatically adjusted and a puff capture system to control system spikes. The RTO is rated at 98% destruction efficiency at 1600 ° F. The heat of combustion is 15,125 Btu/lb. The unit is equipped with a LPG fired burner.

For Informational purposes only:

In accordance with Rule 62-210.244 (P.T.E.), "Potential to Emit" – The maximum capacity of an emission unit or facility to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the emissions unit or facility to emit a pollutant, **including air pollution control equipment** and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable. Secondary emissions do not count in determining the potential to emit of an emission unit or facility.

After the addition of this new enameling oven and the RTO, the facility-wide VOC potential to emit of 22.31 TPY and Total HAP potential to emit of 10.54 are still below the major threshold limits.

This facility currently consists of the following coating and enameling machines:

a) Machines G-01 through G-14
b) Machines L-1 through L-17
c) Machines S-02, S-04, S-07 through S-10
d) Machines D-0, D-01 through D-19
e) MAG Machine M-01 & M2
f) Machines T1 through T6
g) Machine H1 through H3
h) MAG HESF 2/2-3/49 F enameling oven

The facility also consists of a 4.5 KW electric steam boiler, and three (3) Teflon coaters (insignificant sources).

This facility emits Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) from various activities.

REGULATORY CLASSIFICATION

The facility is classified as a natural minor of air pollution source. The facility is not subject to any requirements of NSPS and NESHAP.

E.U. ID No.	Brief Description
001	Coated Wire Facility

RULE APPLICABILITY

The facility is subject to the following regulations:

- **Chapter 62-4, F.A.C. - Permits**
- Rule 62-4.160, F.A.C.- General Permit Conditions
- Rule 62-4.130, F.A.C. – Plant Operation - Problems
- **Chapter 62-210, F.A.C. – Stationary Sources – General Requirements**
- Rule 62-210. 300, F.A.C. – Permits Required
- Rule 62-210. 350, F.A.C. – Public Notice and Comment
- Rule 62-210.650, F.A.C. – Circumvention
- Rule 62-210.700, F.A.C. – Excess Emissions
- **Chapter 62-296, F.A.C. – Stationary Sources – Emissions Standards**
- Rule 62-296.320, F.A.C.- General Pollutant Emissions Limiting Standards
- **Chapter 62-297, F.A.C. – Stationary Sources – Emissions Monitoring**
- Rule 62-297.310, F.A.C. – General Test Requirements

OPERATING LOCATION

Located at 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.

Application for Air Construction Permit-Non-Title V Source received April 28, 2008

GENERAL CONDITIONS [RULE 62-4.160, F.A.C.]:

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 these 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 no 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 permittee 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 records 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.

GENERAL CONDITIONS [RULE 62-4.160, F.A.C.]:

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

   b. the period of noncompliance, 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 17-4.120 and 17-730.300, 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)

GENERAL CONDITIONS [RULE 62-4.160, F.A.C.]:

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 measurements;
    - 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.

SPECIFIC CONDITIONS:

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. Hours of Operation: The hours of operation are not restricted: 24 hours/day; 7 days/week; 52 weeks/year (8760 hours/year).
   [Rules 62-4.160(2)&(14)(b), 62-210.200(PTE), F.A.C.]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

Specific Conditions No. 2-6 are Applicable Rules From Rule 62-296.320, F.A.C.- General Pollutant Emissions Limiting Standards

2. General Visible Emissions Standard: Except for emissions unit that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharge into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on Ringelmann Chart (20% opacity). Compliance shall be determined by EPA Method 9 upon Department's request, incorporated and adopted by reference in Rule 62-297, F.A.C. [Rule 62-296.320(4)(b) 1., F.A.C.]

3. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

4. Open Burning Prohibition: Open burning is prohibited, except when determined by the Department to be the only feasible method of operation and authorized by this permit or an emergency exists which requires immediate action to protect human health and safety. [Rule 62-296.320(3)(a)&(b), F.A.C.]

5. Volatile Organic Compounds Emissions: The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying any known and existing vapor emission control devices or system deem necessary and order by the Department. Procedures to minimize VOC emissions shall include, but not limited to:
   i. Maintain tightly fitting cover, lid, etc. on all containers of materials containing VOC when they are not being handled, tapped, etc.
   ii. 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.
   iii. All fittings, valves, lines, etc., shall be properly maintained.
   iv. All VOC spills shall be attended to immediately and the materials properly disposed of, recycled, etc.

   [Rule 62-296.320 (1)(a), F.A.C. and permit No. 0350011-007-AC]

SPECIFIC CONDITIONS:

6. Unconfined Particulate Matter: No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of material; construction, alteration, demolition or wrecking; or industrially activity such as loading, unloading, storing and handling; without taking reasonable precaution to prevent such emissions. Reasonable precautions may include but are not limited to the followings:
   a. Paving and maintenance of roads, parking areas and yards.
   b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
   c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
   d. Removal of particulate matter from paved roads and/or other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
   e. Landscaping or planting of vegetation.
   f. Use of hoods, fans, filters and similar equipment to contain, capture and prevent particulate matter.
   g. Enclosure or covering of conveyor systems.
   h. Confining abrasive blasting where possible.

   [Rule 62-296.320(4)(c), F.A.C.]

7. Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
   [Rule 62-210.650, F.A.C.]

8. Plant Operation – Problems: 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.]

9. Excess Emissions: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
   [Rule 62-210.700(1) and (4), F.A.C.]

SPECIFIC CONDITIONS:

10. Malfunctions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program 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.]

11. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7), F.A.C.]

12. Compliance Test Procedures: Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[Rule 62-296.414(3)(b), F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

13. Recordkeeping (Material Usage): Owner or operator shall record the following data.
    a. Monthly VOCs containing material usage.
    b. Material safety data sheet (MSDS) or material content specification sheet provided by manufacturer for each VOCs containing material used.
    c. Monthly VOCs and HAP emissions.
    d. Copy of all calculations and supporting documents for VOC and HAP emission rate estimation.

14. Record Retention: All the measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least three (3) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request.
[Rule 62-160(14) b., F.A.C.]

15. Emissions Report: The owner or operator shall submit an emissions report to the Department within 60 days prior to March 1 of each year to continue demonstrating that the facility is a minor source.

ADMINISTRATIVE:

16. Issuance of this permit does not relive the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations.
[Rule 62-210.300, F.A.C.]

17. **Modifications**. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rule 62-210.300(1), F.A.C.]

SPECIFIC CONDITIONS:

18. **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(1), F.A.C.]

19. The I.D. No. and Project name for this source shall be used on all correspondence.

20. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

21. A completed **Application for Air Permit – Non-Title V Source** [DEP Form No. 62-210.900(3)] shall be submitted to the Department at least 30 days prior to the expiration date of this construction 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.
[Rules 62-4.055 and 62-4.220, F.A.C.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Draft

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