Florida Department of Environmental Protection

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PERMITTEE:

Kanthal Palm Coast
1 Commerce Blvd
Palm Coast, Florida 32135

Authorized Representative:
Phil Yu, Site manager

Air Permit Number: 0350011-012-AO
Date of Issue: July 10, 2009
Expiration Date: February 06, 2012

Kanthal Palm Coast
Operation Permit Revision

PROJECT AND LOCATION

This permit authorizes: the revision of air operation permit No. 0350011-010-AO to incorporate the terms and conditions of air construction permit No. 0350011-011-AC.

The facility is located in Flagler County at 1 Commerce Boulevard, Palm Coast, Flagler. The UTM coordinates Zone 17, 474.60 km East and 3269.00km North.

STATEMENT OF BASIS

This Air Operation 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 operate in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department. Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

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Executed in Jacksonville, Florida.

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

FACILITY AND PROJECT DESCRIPTION

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. In accordance with Air Construction Permit No. 035001-011-AC, the RTO is rated at 98% destruction efficiency at 1600 ^{o} F. The heat of combustion is 15,125 Btu/lb. The unit is equipped with a LPG fired burner.

This facility 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, 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
i) Aumann DLH 6-80-160 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.

The facility consists of the following permitted emissions unit and emissions points.

Facility ID No. 0350011	
Eu ID No.	Emission Unit Description
001	Coated Wire Facility

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.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Florida Department of Environmental Protection (Department). The mailing address is 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to this District office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Air Program Office. The telephone number of the District Office is (904)807-3300.

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;
   d. Appendix D Common Testing Requirements

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the 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, 62-296 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: 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.]

7. A completed **Application for Non Title V Air Permit Renewal** (DEP Form No. 62-210.900(4), F.A.C.), 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.
   [Rules 62-4.055 and 62-4.220, F.A.C.]

This section of the permit addresses the following emissions unit:

EU ID No.	Emission Unit Description
001	Coated Wire Facility

PERFORMANCE RESTRICTIONS

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., Definitions- Potential to Emit (PTE)]

EMISSIONS STANDARDS

2. Property line Monitoring: The permittee shall conduct daily inspection of property line to determine if any odors are detected.

   [Rule 62-4.070(3), F.A.C., and Permit No. 0350011-007-AC]

3. Maintenance-RTO: The RTO shall be maintained in order to operate successfully. The maintenance actions include the followings but not limited to:
   a. Daily- The operator shall "walk around" the RTO at least once a day to observe the normal operation of the system and attempt to spot any potential problem.
   a. Weekly- All lubrication points shall be checked weekly.
   b. Monthly- All pipelines should be inspected to insure there are no leaks. All airlines shall be checked to insure there is no moisture or dirt present which could disrupt proper operation. The combustion blower inlet filter shall be checked to insure it is not to be clogged.
   c. Semi-Annually- The hatches at the diverter valves should be removed while the unit is offline. Valve seating areas shall be inspected for any wear or buildup from process stream contaminants. Valve operation shall be observed to insure total closure is occurring when the valves are in the extended and retracted positions. The main fan and the bearing shall be observed while the unit is online to insure there is no excessive heat or vibration. Records should be kept of all observations.
   e. Annually- The RTO should be taken offline and allowed to cool down sufficiently to allow vessel entry to occur. The burner/combustion chamber shall be inspected internally to insure that all refractory modules are in good shape and that the ceramic media shows no sign of degradation. The main fan access hatch shall be removed and the wheel examined for signs of particulate deposition or corrosion. The main fan coupling shall be examined to insure proper alignment is being maintained. The combustion blower internals shall be examined as well. All instrumentation calibration shall be verified.

   [Permit No.0350011-008-AC]

RECORDS AND REPORTS

4. 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.

5. Recordkeeping (Maintenance): Owner or operator shall hold at the facility all the maintenances and inspections records as required by Specific Condition No.6.

   [Rule 62-160(14), F.A.C.]

6. 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.]

7. 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.

   [Permit No. 0350011-011-AC]