



Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr
Secretary

NOTICE OF ADMINISTRATIVELY CORRECTED NON-TITLE V AIR OPERATION PERMIT

In the Matter of an Administrative Correction:

Mr. Phil Yu, Site Manager
Kanthal Palm Coast
1 Commerce Blvd.
Palm Coast, Florida 32135

Project No.: 0350011-014-AO
Administrative Correction to Permit No.: 0350011-013-AO

The Department has determined that a minor correction to information contained in Permit Number 0350011-013-AO is required. This Administrative Permit Correction was processed as Project Number 014, pursuant to Rule 62-210.360, F.A.C. This corrective action does alter the effective date of the existing permit.

The fuel for the RTO burner hereby changed to allow either LPG or Natural Gas.

The Facility Description of Permit No. 0350011-013-AO is revised as indicated in the attachment. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text.

The Department of Environmental Protection (Department) will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

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 agency clerk in the Office of General Counsel of the Department of Environmental Protection, 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 21 days of receipt of this Written Notice of Intent to Exempt from Air Permitting.

Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 21 days of publication of the attached Public Notice or within 21 days of receipt of this Written Notice of Intent to Exempt from Air Permitting, 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 21 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 Exempt from Air Permitting. 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.

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

Executed in Jacksonville, Florida.



Khalid Al-Nahdy, P.E.
District Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Administratively Corrected Non-Title V Air Operation Permit was sent by certified mail or 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 February 2, 2012, to the persons listed below.

Mr. Mr. Phil Yu, Site Manager, Sandvik Palm Coast (Email: phil.yu@sandvik.com)
Ms. Sara Greivell, Project Manager, Grove Scientific & Engineering Company (Email: sara@grovescientific.com)

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



2/2/2012

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

Existing Facility

Kanthal Palm Coast is manufacturer of precision wire and ultra-fine wire products that are used throughout the medical, electronic, aerospace, music, and other commercial industries.

Production consists of four main operations: wire drawing, annealing, enameling and milling with ancillary operations such as etching and die cleaning.

Non-ferrous wire is "drawn" by being pulled through a series of drawing dies to reduce the diameter of the wire. The wire is then sent to the annealing furnace upon reaching the desired diameter. Annealing softens the wire to make it more pliable and also cleans it by burning off oil and dirt.

The wire is then coated in an organic polymeric material (nylon, polyurethane, polyimide, etc.), in the enameling machines where the wire is fed at speeds ranging from 25 to 500 feet per minute. The wire passes through a bath in the coating applicator and drawn through a coating die that scrapes off the excess coating, leaving a thin film on the wire. The wire may be fed back through the coating applicator more than one time in order to apply the coating in layers and acquiring the desired thickness of coating. After being coated, the wire is routed through to an oven (approximately 620 °F) where the coating dries and cures. The heating oven is considered to be an integral part of the enameling machine. From the heating oven the wire is wound and prepared for shipment to the customer.

The VOCs driven off from the coating during the curing process are sent to a Regenerative Thermal Oxidizer (RTO) for control.

Some product types require that the uncoated wire be etched with sulfuric acid prior to coating. The sulfuric acid is a dilute solution of approximately 15 percent.

On October 5, 2006, the facility certified that the manufacturing building meets the criteria of a Permanent Total Enclosure* as described in EPA Method 204, Procedure T- Criteria for and Verification of a Permanent or Temporary Total Enclosure. All the VOC emissions are assumed to be 100% captured and vented to the RTO for destruction.

* *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 exhausted out of the enclosure.

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. 0350011-011-AC, the RTO is designed for 98% destruction efficiency at 1600 ° F. The heat of combustion is 15,125 Btu/lb. The unit is equipped with a ~~LPG~~ Natural Gas fired burner*.

SECTION 1. GENERAL INFORMATION

* Natural Gas means:

- (1) A naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane; or
- (2) Liquid petroleum gas, as defined by the American Society of Testing and Materials in ASTM D1835 (incorporated by reference, see §60.17); or
- (3) A mixture of hydrocarbons that maintains a gaseous state at ISO conditions. Additionally, natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 34 and 43 megajoules (MJ) per dry standard cubic meter (910 and 1,150 Btu per dry standard cubic foot).

This facility consists of the following coating and enameling machines:

- a) Gold Ovens/Machines (Special Enamel) Nos. G-01 through G-14
- b) Long Ovens/Machines Nos. L-1 through L-17
- c) Short Ovens/Machines Nos. S-02, S-04, 07 through S-10
- d) Double Ovens/Machines Nos. D-0, D-01 through D-19
- e) MAG Machine Nos. M-01 & M-02*
- f) Tower Ovens (Bose)/Machines Nos. 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

* Machine which does drawing, annealing, coating, and packaging. The VOCs driven off during the curing process are destroyed by the internal catalytic burner which destroys 99% of emissions. The catalytic burner is an integral part of the machine.

There are three die cleaning operations in the facility and one pump cleaning operation. These operations are ancillary to the enameling operations. Machine dies and pumps are flushed with three materials: xylene, cresylic acid, and NMP. Both die cleaning and pump cleaning operations are conducted under hoods. Emissions from the hoods are vented to the RTO for control.

The facility also includes a 4.5 KW electric steam boiler, and three (3) Teflon coaters. These sources meet the generic exemption criteria of Rule 62-210.300(3)(b)1., F.A.C.

This facility is classified as a natural minor air pollution source. It emits Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). For informational purposes, the annual solvent usage rate on a facility-wide basis is approximately 187 tons.

SECTION 1. GENERAL INFORMATION

The existing facility consists of the following emission units.

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

FACILITY REGULATORY CATEGORIES

- The facility is a not major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

RELEVANT DOCUMENTS

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

Application for Air Permit – Non-Title V Renewal received December 2, 2011