Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

PERMITTEE

Spectra Metal Sales, Inc.
6104 Boat Rock Blvd
Atlanta, GA 30336

Authorized Representative:
Mr. Gary Kienel, Regulatory Compliance & Safety Director

Air Permit No. 1030132-014-AF
Federally Enforceable State Operation Permit

Spectra Metal Sales, Inc.
Pinellas County, Florida

PROJECT

This is the final Federally Enforceable State Operation Permit, which authorizes the operation of Spectra Metal Sales, Inc., which is a coil coating facility (Standard Industrial Classification No. 3479). The facility is located in Pinellas County at 5100 140th Avenue North in Clearwater, Florida. The UTM coordinates are Zone 17, 332.38 kilometers (km) East, and 3087.06 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements and Facility-wide Specific Conditions); Section 3 (Emissions Unit Specific Conditions); and 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.

Permitting Authority: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air and Solid Waste Permitting Section in the Southwest District Office. The Permitting Authority's physical address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's phone number is 813-470-5700.

Petitions. A person whose substantial interests are affected by the proposed 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 (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must 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 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 Department'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 how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e)

A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department's final action may be different from the position taken by it in this notice. 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.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: 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 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.

1030132-014-AF Effective Date: August 5, 2016
Renewal Application Due Date: June 6, 2021
Expiration Date: August 5, 2021

Executed in Hillsborough County, Florida.

for

Pamala Vazquez
Program Administrator
Permitting & Waste Cleanup Program
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Federally Enforceable State Operation Permit package 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 the date indicated below to the following persons.

Gary Kienel, Spectra Metal Sales, Inc., (g.kienel@spectrametals.com)
Wendy Hines, Spectra Metal Sales, Inc., (wendyh@spectrametals.com)
Bruno Ferraro, Grove Scientific Company, (bruno@grovescientific.com)
Sherrill Culliver, PCAQD, (sculliver@co.pinellas.fl.us)

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.

Rhonda Hughes (Clerk) August 5, 2016 (Date)

FACILITY DESCRIPTION

The facility consists of a continuous coil coating line.

The existing facility consists of the following emissions unit (EU).

EU No.	Emission Unit Description
001	Coil Coating Line with Thermal Oxidizer

APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulation	EU No.
Federal Rule Citations	
40 CFR 60, Subpart A, NSPS General Provisions	001
40 CFR 60, Subpart TT, Standards of Performance for Metal Coil Surface Coating	001
State Rule Citations	
Rule 62-210.300, F.A.C., Permits Required	001
Rule 62-296.502, F.A.C., Reasonably Available Control Technology (RACT) for Coil Coating	001

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 62-213, 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.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1030132-012-AF.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Southwest District of the Department of Environmental Protection (Department). The mailing address, phone number and e-mail address is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air and Solid Waste Permitting Program
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-470-5700
   E-mail: SWD_Air_Permitting@dep.state.fl.us

   All documents related to applications for permits to operate an emissions unit shall be submitted to the above e-mail address and/or address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Air Quality Division. The mailing address, phone number and e-mail address of the Local Air Program is:

   Pinellas County Air Quality Division
   509 East Avenue South, Suite 138
   Clearwater, Florida 33756
   Telephone: 727-464-4422
   E-mail: Airquality@pinellascounty.org

3. Appendices: The following Appendices are attached as a 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); Appendix E (40 CFR 60, Subpart A – General Provisions); Appendix F (40 CFR 60, Subpart TT – Standards of Performance for Metal Coil Surface Coating); and Appendix G (O & M Plan for the Thermal Oxidizer).

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: 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. Renewal. Prior to sixty (60) days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty (60) days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. 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.;
   c. copies of the most recent compliance test reports required by Specific Condition No. A.18, if not previously submitted;
   d. copies of the most recent two month of records/logs specified in Specific Condition No(s). A.20 and 21.; and
   e. any proposed revisions to the most recently approved O & M Plan (Pinellas County Air Quality Divisions, PCAQD) *(see Specific Condition No. A.22)*.

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

8. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) District Office or PCAQD. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C.

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

   {Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

FACILITY-WIDE REQUIREMENTS

9. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions: The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The facility shall comply with the following:
   a. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials.
   b. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.
   c. Tightly cover or close all VOC containers when they are not in use.
   d. Prevent excessive air turbulence across exposed VOCs.

e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Operation Permit 1030132-012-AF]

A. EU 001 – Coil Coating Line with Thermal Oxidizer

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	The coil-coating process is the roller application of a wet film of coating or paint to one or both sides of a moving continuous metal strip. The metal strip (substrate) is decoiled, pretreated with a hot alkali degreaser, coated with a uniform decorative or functional coating, oven cured, recoiled, and packaged for shipment. The coil passes through the line once for a primer coat and back through again for the final coat. VOC and HAP emissions from the line and its curing operation are controlled by a Phoenix Model 6000 thermal oxidizer, Serial No. 104144, manufactured by W.R. Grace Tec Systems. The thermal oxidizer is only fired with natural gas at a maximum heat input rate of 5 MMBtu/hour based on a monthly average and has a maximum design VOC loading rate of 247 lbs./hour. This emissions unit includes the main drying/finish oven where the coated coil is cured.

FEDERAL REGULATIONS

A.1. Federal Regulatory Requirements: This emission unit is subject to 40 CFR 60, Subpart TT – Standards of Performance for Metal Coil Surface Coating and 40 CFR 60, Subpart A – General Provisions, which are adopted by reference in Rule 62-204.800, F.A.C.
[Rule 62-204.800(8), F.A.C.]

PERFORMANCE RESTRICTIONS

A.2. Reasonably Available Control Technology (RACT) Requirements: This emissions unit is subject to the requirements of Rule 62-296.502, F.A.C. – Coil Coating.
[Rule 62-296.502, F.A.C.]

A.3. Operational Limitations: The permittee shall comply with the following:

a. The maximum allowable VOC loading rate into the thermal oxidizer is 247 lbs./hour;

b. The run mode set point temperature for the thermal oxidizer shall be set to at least 1420° F (771° C);

c. The temperature of the thermal oxidizer is allowed to be between 1200° F (649° C) and 1420° F (771° C) for up to five minutes upon initiation of each coating operation/job startup **only;**

d. If the thermal oxidizer temperature falls below 1415° F (768° C) during the coating of metal, the coating heads shall be disengaged to stop the coating process; and

e. The thermal oxidizer's bypass stack shall not be in use at any time that coating is in progress.

(Permitting Note: See Appendix D, Condition 1, for Operation Rate during Testing requirements.)

[Rule 62-210.200(PTE), F.A.C.]

A.4. Clean-up Solvent Restriction – Only non-VOC containing clean-up solvents shall be used.
[Rule 62-4.070(3), F.A.C., Operation Permit No. 1030132-012-AF]

A.5. Authorized Fuel and Maximum Heat Input Rate -

a. The thermal oxidizer shall be only fired with natural gas at a maximum heat input rate of 5 MMBtu/hour based on a monthly average.

b. The main drying/finish oven and hot pretreatment degreaser Stages 1, 2, and 3 shall be only fired with natural gas with a sum total maximum heat input rate not to exceed 10.1 MMBtu/hour based on a monthly average.

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit Nos. AC52-121698 & AC52-243047]

A.6. Restricted Operation: The hours of operation of are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.7. HAP Emissions Limitations - Total HAP emissions shall not exceed 8.2 tons per any consecutive 12-month period.
[Rule 62-210.200 ("Potential to Emit") F.A.C., Operation Permit No. 1030132-012-AF]

A.8. VOC RACT Limitations – VOC content shall not exceed 4.0 pounds per gallon of solids (24-hour weighted average), excluding water delivered to the coating applicator.
[Rules 62-296.500(5) and (6) and 62-296.502(2), F.A.C.; Operation Permit 1030132-012-AF]

A.9. VOC Emission Limitations – VOC emissions shall not exceed the following limitations:

a. 10% of the VOCs applied each calendar month (90% emission reduction); and

b. 10.5 lbs. VOC/hour (monthly average basis).

(Permitting Notes: The 90% emission reduction required by 40 CFR 60, Subpart TT 60.462(a)(3) refers to an overall destruction efficiency, which is the result of destruction efficiency x capture efficiency. Compliance with this limit ensures that the thermal oxidizer meets the minimum VOC destruction efficiency (90%) of Rule 62-296.502(3)(b), F.A.C.

Based on 8,760 hours/year of thermal oxidizer operation, the hourly VOC emission limit is equivalent to 46.0 tons/year.)

[Rules 62-296.500(5), 62-296.500(6) and 62-296.502(3), F.A.C.; 40 CFR 60.462(a)(3); Operation Permit 1030132-012-AF]

A.10. Circumvention of Air Pollution Control Device - The permittee shall not circumvent any air pollution control device or allow the emissions of air pollutants without the applicable air pollution control device (i.e. thermal oxidizer) operating properly. In order to provide reasonable assurance that emissions are being controlled by the thermal oxidizer, the visible emissions from the thermal oxidizer stack should not exceed 5% opacity. If the exhaust stack visible emissions exceed 5% opacity, the Department will not consider this a violation, but an indication that additional controls or work practices may be required.
[Rules 62-4.070(3) and 62-210.650, F.A.C.; Operation Permit No. 1030132-012-AF]

TESTING REQUIREMENTS

A.11. Compliance Tests:

a. During each calendar year (January 1st to December 31st), the emissions unit shall be tested to measure the VOC capture efficiency.

b. 60 days prior to permit renewal application due date AND within 60 days of the half-way point between permit issuance and permit expiration (once per every 2.5 years):

(1) VOC emissions from the thermal oxidizer exhaust stack (outlet mass emission rate);
(2) VOC destruction efficiency of the thermal oxidizer (based on testing the thermal oxidizer inlet and outlet mass emission rate); and

c. Concurrent with any of the VOC capture efficiency and thermal oxidizer VOC destruction efficiency tests listed above (a. & b.): Method 204 for a Permanent Total Enclosure.

[Rule 62-297.310(8)(a)1, 62-297.450, F.A.C.; Operation Permit No. 1030132-012-AF]

A.12 Test Requirements: The permittee shall notify the Compliance Authority in writing at least 30 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(9), F.A.C.]

A.13. Test Methods: Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
24	Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings
25	Determination of total gaseous nonmethane organic emissions as carbon *(Attachment 3 of EPA 450/2-78-041 may be used instead of EPA Method 25)*
25A	Determination of total gaseous organic concentration using a flame ionization analyzer
204	Criteria for and Verification of a Permanent or Temporary Total Enclosure

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

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

A.14. Test Protocol - A test protocol shall be submitted to the Air Compliance Section of the Pinellas County Air Quality Division (PCAQD) at least 60 days prior to testing.

[Rule 62-4.070(3), F.A.C.; Operation Permit 1030132-012-AF]

MONITORING REQUIREMENTS

A.15. Monitoring Requirements - The permittee shall comply with the following:

a. Install calibrate, maintain, and operate a monitoring device which continuously measures and permanently records the thermal oxidizer's combustion temperature per the manufacturer's specifications. The monitoring device shall have an accuracy of $\pm 2.5°$ C or ± 0.75 percent of the temperature being measured expressed in degrees C or F, whichever is greater.

b. The temperature chart shall clearly indicate and record the date, time of day and operating temperature of the thermal oxidizer. The chart shall be preprinted with the time of day and operating temperature scale of the temperature recorder.

[Rule 62-4.070(3), F.A.C.; 40 CFR 60.464(c)]

NOTIFICATION REQUIREMENTS

A.16. Test Notification - The permittee shall notify the Compliance Authority in writing at least 30 days prior to performing any capture efficiency and or control efficiency tests and 15 days prior to all other testing. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(*Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-4.070(3), 62-297.310(9) and 62-297.450(3)(d), F.A.C.]

A.17. Notification of Change - If any physical or operational change is made to a control system, the owner or the operator of the affected facility shall notify the department and PCAQD of the change within ten (10) working days after making such change. The Department shall require the applicant to conduct a new capture efficiency test if the Department has reason to believe (based on engineering calculations or empirical evidence) that a physical or operational change made to the capture system has decreased the overall emissions reduction efficiency of the system.
[Rule 297.450(3)(c), F.A.C.; 40 CFR 60.7]

RECORDS AND REPORTS

A.18. 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. For each test run, the report shall also indicate the following:

a. test data and calculations required to demonstrate compliance with the emissions limitations in Specific Condition Nos. A.7., A.8., and A.9.;
b. temperature of the thermal oxidizer, temperature charts (or equivalent) and calculations required to demonstrate compliance with Specific Condition No. A.3.;
c. VOC destruction efficiency and VOC capture efficiency results, and the overall destruction efficiency (result of destruction and capture efficiency) required to demonstrate compliance with Specific Condition Nos. A.9.;
d. utilization rates of the coating(s) in gallons per hour;
e. VOC content of the product coating(s) in lbs. VOC/gallon of solids as applied;
f. VOC loading rate to the thermal oxidizer, in lbs./hour;

g. test data and calculations required to demonstrate the capture efficiency of the permanent total enclosure; and

h. a copy of the logs required by Specific Condition Nos. A.20. and A.21. for the month the test was conducted.

Failure to submit this data or the actual operating conditions may invalidate the test.

[Rule 62-297.310(10), F.A.C.]

A.19. Operational Data - The permittee shall submit a quarterly report identifying each instance in which:

a. The volume-weighted average VOC emissions is greater than 10% of the VOCs applied (i.e., less than 90% emission reduction, as demonstrated in the last accepted VOC overall destruction efficiency compliance test). Annotate this report as 40 CFR 60, Subpart TT VOC Report;

b. The thermal oxidizers' average temperature deviates below 1370° F (50° F below 1420° F)/743° C (28° C below 771° C) for more than 3 hours, (*see also Specific Condition No. A.20.a.*) Annotate this report as 40 CFR 60, Subpart TT Temperature Report;

c. The coating heads on the process line disengage due to the temperature of the thermal oxidizer dropping below 1,415° F during coating operations (*see Specific Condition No. A.3.d.*). Annotate this report as Coating Head Disengagement Report;

d. If no such instances occur in the quarter the report shall state such;

e. The reports shall be based on calendar quarters (January-March, April-June, July-September and October–December), and shall clearly state the report name, quarterly period and year; and

f. The reports are due (postmarked) 30 days after each calendar quarter.

[Rule 62-4.070(3), F.A.C.; 40 CFR 60.464(c) and (d)]

A.20 Temperature Records – The following records shall be kept:

a. All periods in excess of 3 hours during which the average temperature in the thermal oxidizer remains more than 28° C (50° F) below 1420° F (771° C) during coating operations. The records shall identify each such occurrence and its duration and shall include the time the line was disengaged from coating operations.

b. The temperature records shall be maintained at the facility for a period of at least two years and shall be made available to the Department or the Pinellas County Air Quality Division upon request.

[Rule 62-4.070(3), F.A.C.; 40 CFR 60.464(c)]

A.21. Daily and Monthly Log for Coil Coating Line - The permittee shall maintain a log for the coil coating line. The log shall include, at a minimum, the following information:

DAILY

a. The applicable rule - 40 CFR 60, Subpart TT, *Standards of Performance for New Stationary Sources (NSPS), Metal Coil Surface Coating*, and Rule 62-296.502, F.A.C., *Coil Coating (RACT);*

b. Facility name and source description (e.g., Spectra Metal Sales, Inc, Coil Coating Line);

c. Date - day, month, year;

d. The substrate type, which is being coated (e.g., metal);

e. Identification number and amount of each coating used (gallons) and each coating's total VOC and HAP content in lbs. VOC/gallon of solids as applied;

f. Production start and stop times;

MONTHLY

g. Hours of operation;

h. Total VOCs as applied (lbs. or tons);

i. Total VOC and HAP emissions (lbs. or tons);

j. The average hourly emissions for each month (lbs./hour); and

k. Average monthly heat input rate (MMBtu/hour) for the thermal oxidizer, main drying/finish oven and hot pretreatment degreaser Stages 1, 2, and 3 *(to demonstrate compliance with an average monthly heat input total of 15.1 MMBtu/hour (see Specific Condition No. A.5.))*.

VOC emissions shall be based on the usage rates of coatings, their VOC content and the VOC destruction efficiency established during the latest stack test in accordance with the procedures in 40 CFR 60.463(c)(2).

Records of all calculations used to determine VOC emissions, and supporting documentation ("As Supplied", "As Applied" sheets, MSDS, EPA data sheets, purchase orders, etc.) shall be kept which includes sufficient information to determine VOC and HAP emissions.

The above records shall be maintained at the facility for at least three years, and made available to the Department and the Pinellas County Air Quality Division upon request.

[Rules 62-4.070(3), 62-296.500(2), and 62-296.500(5), F.A.C.; 40 CFR 60.463(c), 60.465(e), and Pinellas County Code Section 58-90]

A.22. Operation and Maintenance (O & M) Plan Requirements – The attached O&M Plan (Appendix G), and as revised, with the prior approval of the Pinellas County Air Quality Division (PCAQD), shall be followed for the thermal oxidizer. The O&M Plan documentation logs shall be maintained for a minimum of 3 years. At a minimum the O&M Plan shall also include:

a. The operating parameters of the control device.

b. Timetable for the routine maintenance of the pollution control device as specified by the manufacturer.

c. Time table for routine periodic observations of the pollution control device sufficient to ensure proper operation.

d. A list of the type and quantity of the required spare parts for the pollution control device, which are stored on the premises.

e. A record log which will indicate, at a minimum:

1. When maintenance and observations were performed.
2. What maintenance and observations were performed.
3. Who performed said maintenance and observations.
4. Acceptable parameter ranges for each operational check.

[Pinellas County Code, Section 58-128]