



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

NOTICE OF FINAL PERMIT

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

In the Matter of an
Application for Permit by:

Mr. S.V. Desai, President
Americoat Corporation
2935 Barneys Pumps Place
Lakeland, FL 33812

DEP File No. 1050210-006-AF
Polk County

Dear Mr. Desai:

Enclosed is Final Permit Number 1050210-006-AF. This permit authorizes Americoat Corporation the continued operation of a burn-off oven with after burner control of emissions. This facility is located at 2935 Barneys Pumps Place, Lakeland, Polk County, Florida. This permit is issued pursuant to Section(s) 403.087, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;

PERMITTEE: Americoat Corporation
PERMIT NO.: 1050210-006-AF

- (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 when and how the petitioner received notice of the agency decision;
- (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, 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 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 Department'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 of the Florida Administrative Code.

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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, 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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Mara Grace Nasca
District Air Program Administrator
Southwest District

MGN/QN/pp

Enclosures

PERMITTEE: Americoat Corporation
PERMIT NO.: 1050210-006-AF

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit) was sent by certified mail before the close of business on 09-01-2009 to the person(s) listed:

Mr. S.V. Desai, President
Americoat Corporation
2935 Barneys Pumps Place
Lakeland, FL 33812

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

09-01-2009
(Date)

Note: An electronic version of this Notice of Final Permit and the Final Permit will be posted on the Division of Air Resource Management's world wide web site. The web site address is:

<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>



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PERMITTEE:

Americoat Corporation
2935 Barneys Pumps Place
Lakeland, FL 33812

FINAL Permit No.: 1050210-006-AF

County: Polk

Effective Date: 09/01/2009

Expiration Date: 09/01/2014

Project: Federally Enforceable State Operating
Permit (FESOP) Renewal

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and Chapter 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:

This permit authorizes the continued operation of a burn-off oven with after burner control of emissions. The facility is mainly a powder coating job-shop. The burn-off oven removes old coatings (epoxies, polyesters, etc.) from steel and aluminum parts. After coating removal, the parts are either sanded, wire brushed, or abrasive blasted. The parts are then powder coated.

The automatic burn-off oven operation procedure is as follows:

1. Each batch is about 6000 lbs of metal, coating thickness is about 4 Mils, and coating material is about 60 lbs.
2. 30 minutes to load the oven; check the water sprinkler system, door stays open.
3. Afterburner starts, flame is detected and oven door is closed. Afterburner runs for 45 minutes to reach 1400^oF stack temperature.
4. Then the primary burner is activated automatically and it takes about 45 minutes to reach 800^oF.
5. Burn-off process starts. The timer is manually set for 3 hours to ensure completion of burn-off process. If a higher amount of coating is expected, then the hours are increased.
6. At the end of the cycle, the oven shuts off automatically and cool down cycle begins.

The temperature of the after burner is factory set. The primary burner cannot start until the stack temperature reaches above 1400^oF (design factor). There is no manual control to change this temperature. If for any reason, this does not occur, the oven automatically shuts off. The burner has a temperature indicator. Typically, the stack temperature reads 1500^oF.

The oven removes the combustible materials (i.e., old coatings). The system monitors the rate of smoke emissions from the parts by measuring stack temperature. Any increase in smoke emissions raises the stack temperature. When the stack temperature reaches a preset point, the stack controller turns on water spray to cool the parts, lowering the smoke emission rate before the smoke can reach an ignition state inside the oven's cleaning chamber. The water spray system also operates if the oven temperature exceeds its set-point temperature by 30^oF. In case of a malfunction, the oven shuts off.

PERMITTEE:
Americoat Corporation

FINAL Permit No.: 1050210-006-AF
Project: FESOP Renewal

Besides the powder coatings, the facility also applies fluoropolymer coatings such as teflons. Teflons come in powder or liquid form (water and solvent based). Facility keeps records of the usage of these coatings.

Permitted Emissions Unit

Emission Unit ID No. 003 – Controlled Pyrolysis, Model PRC 330, Burn-off oven No. 11:

The burn-off oven No. 11 is a natural gas fired device with after burner control of emissions. It is a controlled pyrolysis, cleaning furnace manufactured by Pollution Control Products, Model PRC 330. The maximum heat input rate is 0.80 MMBtu/hour.

(Permitting Note: The facility used to have burn-off oven No. 1 (E.U. No. 021). The permittee has notified in the operation permit renewal application that this emission unit E.U. No. 021 does not exist anymore. It has been dismantled and removed from the site permanently. ARMS database has been updated with this information).

Exempt Emission Sources

The emissions from the following emission sources at this facility are deemed insignificant and exempt from permitting:

- Curing and Drying ovens (except for Emission Unit No. 3: burn-off oven No. 11)
- Liquid Teflon Spray Booths (Emission Unit 001)
- Grit blast system (Emission Unit 004)
- Powder Spray Booths (Emission Units 017 through 020)

[Rule 62-4.040(1)(b), F.A.C.; Construction Permit No. 1050210-002-AC]

Rule Applicability Note

The facility is subject to Rule 62-210.300(2)(b), F.A.C. – Additional requirements for FESOPs for non-Title V sources.

Facility Information Summary

Location: 2935 Barneys Pumps Place, Lakeland, Polk County

UTM Coordinates: 17-411.37 East 3096.92 North

Facility ID No.: 1050210

Emission Unit ID No. and Description:

003 – Burn-Off Oven No. 11

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

Permit History/Affected Permits: Replaces Permit No. 1050210-005-AF

Attachment(s) to this permit:

General Conditions, version dated 11/1/2005

Specific Conditions:

1. General Conditions - A part of this permit is the attached 15 General Conditions.
[Rule 62-4.160, F.A.C.]

2. Other Requirements - Issuance of this permit does not relieve the permittee from complying with the applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. or any other requirement under federal, state, or local law.
[Rule 62-210.300, F.A.C.]

Operation and Emission Limitations

3. Operating Hours - The emission unit is permitted for continuous operation (i.e., 8,760 hours/year)]
[Rule 62-210.200, F.A.C. (Definitions - Potential to Emit); Construction Permit 1050210-003-AC]

4. Operational Limitations –

- A. Burn-off oven is limited to being only fired with natural gas.
- B. Burn-off oven shall be used to remove paint residue from liquid-coated and powder-coated metal parts. It shall not be used for the curing or drying of varnished or painted parts that may contain uncured paint or significant amounts of volatile solvents.
- C. Burn-off oven is limited to operate a maximum 2 batches per day. A typical batch cycle is about 4.5 hours and is determined from the time a part(s) is placed in the oven and the firing of natural gas is initiated until the natural gas is shutdown. The hours are increased if higher amount coating is expected.
- D. During periods when parts are being processed in the oven, the burn-off oven's afterburner shall be maintained at a minimum of 1,400⁰F.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050210-003-AC]

5. Monitoring Equipment Requirements – During periods when parts are being processed in the oven, the burn-off oven's afterburner temperature shall be displayed by a temperature gauge.
[Rule 62-4.070(3), F.A.C.]

6. Recordkeeping Requirements – In order to comply with the Specific Condition Nos. 4.B., and 4.C., the permittee shall keep the following records for all periods of burn-off oven operations:

- A. Facility ID No. (1050210) and Date (month/day/year);
- B. Oven Identification (i.e., Controlled pyrolysis oven, Model PRC 330); and Emission Unit Number (i.e., EU003);
- C. Batch cycle start time as determined when a part(s) is placed in the oven and the firing of the natural gas is initiated. Also record the afterburner temperature;
- D. Batch cycle end time as determined when the natural gas is shut off. Also record the afterburner temperature just before the natural gas is shut off;
- E. Time of each batch cycle, in hours.

[Rule 62-4.070(3), F.A.C.]

7. Circumvention of Control Equipment - The permittee shall not circumvent any air pollution control device or allow the emissions of air pollutants without the applicable air pollution control device (afterburner) operating properly. Increasing the volume of any exhaust stream for the purpose of reducing stack exhaust concentrations is forbidden. This includes allowing dilution air to enter the system through leaks, open vents, or similar means.

[Rule 62-210.650, F.A.C.]

8. Modification: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.

[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

9. General Pollutant Emission Limiting Standard: Visible Emissions – Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule, no person shall cause, let, permit, suffer or allow to be discharged 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 the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Rule 62-297.401, F.A.C. The visible emissions from the burn-off oven shall not be equal to or greater than 20% opacity.

[Rules 62-296.320(4)(b)1, 62-296.320(4)(b)4 and 62-297.401, F.A.C.;]

10. General Pollutant Emission Limiting Standards: 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.

[Rules 62-210.200 (Definition "Objectionable Odor") and 62-296.320(2), F.A.C.]

11. Excess emissions – Excess emissions resulting from startup, shutdown, or malfunction 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 a 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 be reasonably prevented during startup, shutdown, or malfunction shall be prohibited.

[Rule 62-210.700, F.A.C.]

Compliance Monitoring and Testing

12. Visible Emission Test Requirements – The burn-off oven's exhaust shall be tested for visible emissions on an annual basis between October 1st and September 30th (once per Federal Fiscal Year).

[Rules 62-4.070(3) and 62-297.310(7)(a)4., F.A.C.; Construction Permits 1050210-002-AC and 1050210-003-AC]

13. Visible Emission Test Methods and Procedures - The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-204.800(8)(e), F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. Each visible emissions test shall be conducted by a certified observer and be a minimum of thirty (30) minutes in duration. The test

observation period shall include the period during which the highest opacity can reasonably be expected to occur.

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

14. Visible Emission Test Condition – The burn-off oven’s exhaust shall be tested for visible emissions while cleaning coatings from parts that are likely to produce the worst-case visible emissions during the cleaning process.

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

15. Visible Emission Test Reports - The permittee of an air pollution emissions unit, for which visible emission tests are required, shall file a report with the Air Compliance Section of the Department’s Southwest District Office on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after each test is completed. The test report submittal shall include a copy of the oven’s records as required by Specific Condition No. 6. for the tested batch cycle.

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

16. Testing Notification - At least 15 days prior to the date on which any compliance test is due to begin, the permittee shall provide written notification of the test to the Air Compliance Section of the Department’s Southwest District Office. 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 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) and 62-297.310(7)(a)9, F.A.C.]

17. Operation Permit (AF) Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Air Permitting Section of the Department’s Southwest District Office no later than 60 days prior to the expiration date of the operation permit. 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. copy of the most recent visible emission test report for the burn-off oven No. 11 (Specific Condition No. 15).
- D. copy of the most recent operating month record (Specific Condition No. 6).

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Mara Grace Nasca
District Air Program Administrator
Southwest District

MGN/QN/pp

ATTACHMENT - 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 403.141, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.). 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), F.S., 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 this permit.
4. Not applicable to Air Permits.
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, are 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 reasonable times, 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 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 reasonable 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 noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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.

ATTACHMENT - GENERAL CONDITIONS

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 Section 403.111 and 403.73, F.S. 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 Rule 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)

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:
 - 1. the date, exact place, and time of sampling or measurements;
 - 2. the person responsible for performing the sampling or measurements;
 - 3. the dates analyses were performed;
 - 4. the person responsible for performing the analyses;
 - 5. the analytical techniques or methods used;
 - 6. 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 the 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.

16. Not applicable to Air Permits.

17. Not applicable to Air Permits.