



Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

FINAL PERMIT

PERMITTEE

Keymark Corporation of Florida
2540 Knights Station Road
Lakeland, FL 33810

Authorized Representative:

Mr. Joseph R. Cenna, Vice President

Air Permit No. 1050320-014-AC

Permit Expires: 01/06/2012

Site Name : Lakeland Plant

Minor Air Construction Permit

Project Name: Add 3rd Aluminum

Extrusion Line

This is the final air construction permit, which authorizes installation of a third aluminum extrusion press line, increase in uncoated aluminum extrusion production capacity, and decrease in VOC emission limitation from 494 to 247 tpy. The proposed work will be conducted at the Lakeland Plant (Standard Industrial Classification No. 3354). The facility is located in Polk County at 2540 Knights Station Road in Lakeland, Florida. The UTM coordinates are Zone 17, 402.03 km East, and 3106.24 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-Wide and Emissions Unit Specific Conditions

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.

This air pollution 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 conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 (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 Hillsborough County, Florida

Mara Grace Nasca January 11, 2010
Mara Grace Nasca Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) 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 January 12, 2010 to the persons listed below.

Mr. Joseph R. Cenna, Keymark Corporation of Florida (jcenna@keymarkcorp.com)
Mr. Edward Thomas Brookman, SCI-TECH, Inc. (ebrookman@sci-techinc.com)

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.

Patricia Driskell January 12, 2010
(Clerk) (Date)

Keymark Corporation of Florida
Lakeland Plant

Air Permit No. 1050320-014-AC
Project Name: Add Third
Aluminum Extrusion Line

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Keymark Corporation of Florida-Lakeland Plant

The Lakeland Plant is an aluminum extrusion manufacturing facility that produces both mill finish (uncoated) and coated aluminum extrusions. Emission Unit (EU) No. 001 includes two identical existing aluminum extrusion press lines, 1 and 2. Each existing press line includes a press, log heater, die oven, and tempering oven for the production of aluminum extrusions. The basic raw material is alloy 6063 aluminum logs which are provided by outside suppliers. The combined maximum gross extrusion production capacity of the existing press lines is 44.7 million pounds per year, which is equivalent to 2,552 pounds per hour for each of the two presses on a 24-hour per day, 365 days per year basis.

EU No. 001 also includes a paint line for the coating of a portion of the extrusions produced by the press lines. The paint line consists of the pretreatment tanks, dry off oven, automatic and manual paint booths, a dry powder spray booth, curing oven and the conveyor system, which transports extrusions through the coating process.

The paint hook cleaning incinerator (EU No. 003) is used to remove cured paints and powder coatings from metal hooks, racks, and hangers used in the painting operations at the facility. Only natural gas is fired in the incinerator at a maximum design heat input rate of 375,000 BTU/hr. in the primary chamber and 475,000 BTU/hr. in the afterburner. The incinerator is subject to Rule 62-296.401(1), F.A.C.

The existing facility consists of the following regulated emissions units.

Facility ID No. 1050320	
ID No.	Emission Unit Description
001	Aluminum Extrusion Press Lines and Painting Operations
003	Paint Hook Cleaning Incinerator <i>(Not addressed in this permit)</i>

Project Description and Proposed Emission Unit

The proposed new extrusion press line will be located in an adjacent building. Press line No. 3 will include a press, a natural gas fired log heater (exempt source) with a fuel capacity of 3.90 MMBtu/hr, electrically heated die ovens, and a natural gas fired tempering oven (exempt source) with a fuel capacity of 3.85 MMBtu/hr for the production of aluminum extrusions. The gross production capacity of the proposed press line is 33.7 million pounds per year, which is equivalent to 3,850 pounds per hour on a 24-hour per day, 365 days per year basis.

This project authorizes an increase in the uncoated aluminum extrusion production capacity of the facility and decrease in the applicability limit for VOC emissions from 494 to 247 tons per 12 month period.

This project will modify the following emissions unit.

Facility ID No. 1050320	
ID No.	Emission Unit Description
001	Aluminum Extrusion Press Lines and Painting Operations

SECTION 1. GENERAL INFORMATION (FINAL)

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

Exempt Emission Units/Activities

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

- Extrusion Line 1's log heater fired with natural gas at a maximum heat input rate of 4.88 MMBTU/hr. exhausting through a stack designated as S5 per Rule 62-210.300(3)(b)1., F.A.C.
- Extrusion Line 2's log heater fired with natural gas at a maximum heat input rate of 4.88 MMBTU/hr. exhausting through a stack designated as S11 per Rule 62-210.300(3)(b)1., F.A.C.
- Extrusion Line 3's log heater fired with natural gas at a maximum heat input rate of 3.90 MMBTU/hr. exhausting through a stack designated as S22 per Rule 62-210.300(3)(b)1., F.A.C.
- Extrusion Line 1's die heater fired with natural gas at a maximum heat input rate of 0.45 MMBTU/hr. exhausting through a stack designated as S13 per Rule 62-210.300(3)(b)1., F.A.C.
- Extrusion Line 2's die heater fired with natural gas at a maximum heat input rate of 0.80 MMBTU/hr. exhausting through a stack designated as S14 per Rule 62-210.300(3)(b)1., F.A.C.
- Extrusion Line 1's tempering oven fired with natural gas at a maximum heat input rate of 5.00 MMBTU/hr. exhausting through a stack designated as S8 per Rule 62-210.300(3)(b)1., F.A.C.
- Extrusion Line 2's tempering oven fired with natural gas at a maximum heat input rate of 5.00 MMBTU/hr. exhausting through a stack designated as S13 per Rule 62-210.300(3)(b)1., F.A.C.
- Extrusion Line 3's tempering oven fired with natural gas at a maximum heat input rate of 3.85 MMBTU/hr. exhausting through a stack designated as S23 per Rule 62-210.300(3)(b)1., F.A.C.
- First pre-treatment tank heater (A) fired with natural gas at a maximum heat input rate of 2.00 MMBTU/hr. exhausting through a stack designated as S10A per Rule 62.210.300(3)(b)1., F.A.C.
- Third pre-treatment tank heater (B) fired with natural gas at a maximum heat input rate of 2.00 MMBTU/hr. exhausting through a stack designated as S10B per Rule 62.210.300(3)(b)1., F.A.C.
- Seventh pre-treatment tank heater (C) fired with natural gas at a maximum heat input rate of 2.00 MMBTU/hr. exhausting through a stack designated as S10C per Rule 62.210.300(3)(b)1., F.A.C.
- Drying oven fired with natural gas at a maximum heat input rate of 2.00 MMBTU/hr. exhausting through a stack designated as S1 per Rule 62.210.300(3)(b)1., F.A.C.
- Infrared oven fired with natural gas at a maximum heat input rate of 1.30 MMBTU/hr. exhausting through a stack designated as S19 per Rule 62-210.300(3)(b)1., F.A.C.
- Curing oven fired with natural gas at maximum heat input rate of 5.00 MMBTU/hr. exhausting through a stack designated as S2 per Rule 62-210.300(3)(b)1., F.A.C.
- Curing oven's RTO fired with natural gas at a maximum heat input rate of 2.33 MMBTU/hr. exhausting through a stack designated as S2 per Rule 62.210.300(3)(b)1., F.A.C.
- Seven (7) 5,600 gallon pre-treatment tanks respectively containing alkaline clean and etch solution (contains sodium hydroxide and diethanolamine), water rinse, water rinse, chromate-phosphate conversion coating (contains chromic acid, phosphoric acid, and hydrofluoric acid), water rinse, water rinse, and water rinse per Rule 62-210.300(3)(b)1., F.A.C.
- Die cleaning system consisting of two (2) electrically heated 266 gallon caustic tanks and one 266 gallon water rinse tank per Rule 62-210.300(3)(b)1., F.A.C.

SECTION 1. GENERAL INFORMATION (FINAL)

- Die Nitriding Furnace, electrically heated per Rule 62-296.300(3)(b)1., F.A.C.
- Two 5 gallon solvent recovery systems per Rule 62-296.300(3)(b)1., F.A.C.
- Fenton Technologies, Model No. 116-8, sludge dryer (previously Emission Unit No. 004) per Rule 62-210.300(3)(b)1., F.A.C.
- Safety-Kleen, Model 30, Parts Washer per Rule 62-210.300(3)(b)1., F.A.C.
- Powder Coat Booth per Rule 62-296.300(3)(b)1., F.A.C

FACILITY REGULATORY CLASSIFICATION

- The facility is 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 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.
- This facility is a synthetic non-PSD source for volatile organic compounds (VOCs).

PERMIT HISTORY/AFFECTED PERMITS

Replaces and Modifies Permit Nos. 1050320-009-AC and 1050320-011-AC;

Replaces Permit No. 1050320-013-AC;

Co-processing with Title V Revision Permit No. 1050320-015-AV

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).
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; and
 - d. Appendix D. Common Testing Requirements.
 - e. Appendix E. NESHAP Subpart M MMM
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: 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.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Aluminum Extrusion Press Lines and Painting Operations

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	<u>Aluminum Extrusion Press Lines and Painting Operations</u> -This emission unit includes six (6) paint spray booths and three (3) extrusion press lines. Line 1 is located to the west of Line 2 and Line 3 is located in an adjacent building relative to Lines 1 and 2. The maximum sustainable production capacity is 2,552 pounds of aluminum extrusions per hour for Lines 1 and 2; 3,850 pounds of aluminum extrusions per hour for Line 3. The maximum combined total production capacity is 44.7 million pounds per any consecutive 12-month period for Lines 1 and 2; 33.7 million pounds per any consecutive 12-month period for Line 3. Lines 1 and 2 include an aluminum log heater (each 4.88 MMBTU/hr.), extrusion press, tempering oven (each 5.00 MMBTU/hr.), and die oven (Line 1 - 0.45 MMBTU/hr. & Line 2 - 0.80 MMBTU/hr.). Line 3 includes a press, a natural gas fired log heater (3.90 MMBtu/hr), electrically heated die ovens, and a natural gas fired tempering oven (3.85 MMBtu/hr). The heaters and ovens are fired with natural gas and are considered exempt units.

PERFORMANCE RESTRICTIONS

A. 1. Federal Regulatory Requirements: This emission unit is subject to 40 CFR Part 63, Subpart Mmmm - *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*, which is adopted by reference in Rule 62-204.800, F.A.C.

[Rule 62-204.800(11), F.A.C.]

A.2. Method of Operation: The permittee shall comply with the following:

A. Each paint spray booth shall have a two-stage fiber filter system to control paint overspray emissions. Stage one shall consist of replaceable filter pads and stage two shall consist of replaceable filter packs.

B. Whenever the paint spray booths use "high performance coatings" that meet the American Architectural Manufacturer's Association Specifications 2604 or 2605, the emissions from the curing oven shall be vented to the regenerative thermal oxidizer (RTO).

[Rules 62-296.320(2) and (4), F.A.C.]

A.3. Restricted Operation: The hours of operation are not limited (8760 hours per year).

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.4. Volatile Organic Compound (VOC) Emission Limitation: The maximum VOC emissions shall not exceed 247 tons per any consecutive 12-month period from the painting operations.

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Aluminum Extrusion Press Lines and Painting Operations

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Permit application dated October 05, 2009]

- A.5. 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 or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The permittee 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 VOC/OS.
 - E. Immediately confine and clean up VOC/OS 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.]

MONITORING REQUIREMENTS

- A.6. Reasonable Assurance Requirement: In order to provide reasonable assurance the fiber filter systems are adequately controlling emissions of unconfined particulate matter, visible emissions from the paint spray booths' stacks should not exceed 5%. Exceeding this value shall not be considered a violation in and of itself, but an indication that additional control precautions and/or measures may be necessary.

[Rules 62-4.070(3), 62-210.650, 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

- A.7. Recordkeeping Requirements: A recordkeeping log shall be established and maintained to document compliance with Conditions A.2. and A.4. At a minimum, the log shall identify and quantify each paint, coating, thinner, and solvent used in the painting operations, which contain VOCs. Documentation of solvents consumed, such as during spray paint gun/hose cleanup, may use a mass balance method to determine usage (amount used minus amount collected for disposal or recycle). At the permittee's option, "purchases" may be used where "usage" is specified, except when daily recordkeeping is required as described below. If this option is utilized, no materials may be used, which are not purchased. The permittee shall calculate and record, at a minimum, the following:

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Aluminum Extrusion Press Lines and Painting Operations

- A. Facility name and Emission Unit ID No. 001 (for each record in C., D., and E. below)
- B. Date (for each record in C., D., and E. below)
- C. Monthly (each month's log shall be completed by the first operating day of the next month)
 1. Usage of each paint coating, thinner, solvent, and other materials, which contain VOCs in gallons.
 2. Density (lbs./gal.) and VOC content (wt %) of each item in A.7.C.1.
 3. Total VOC emissions (lbs. or tons).
 4. Total VOC emissions (tons) for the most recent consecutive 12-month period.
- D. Daily (each daily log shall be completed by the end of the next operating day)
 1. If the VOC emissions for the most recent consecutive 12-month period exceed 223 tons, which is 90% of 247 tons, all the monthly logs mentioned above shall be kept on a daily basis. The permittee shall use this information to ensure that the VOC emissions for the upcoming consecutive 12-month period do not exceed permit limitations. Should the consecutive 12-month period for VOC emissions fall below 223 tons, the recordkeeping may revert to monthly.
 2. In order to ensure the emissions from the use of "high performance coatings" in the paint spray booths are being vented to the RTO, record the following:
 - a. Start and end time of using "high performance coatings" in the paint spray booths along with the name of the high performance coating used.
 - b. Start and end time the RTO is operating.
- E. Record the date of paint spray booth filter change-outs along with identifying the paint spray booth.
- F. Each coating shall have a "Product Data Sheet" from the coating's manufacturer that indicates whether the coating does or does not meet the American Architectural Manufacturer's Association Specifications 2604 or 2605.

Supporting documentation (MDS sheets, purchase orders, U.S. EPA "VOC DATA SHEETS", etc.) shall be kept for each paint, coating, thinner, solvent, and other material used in the painting operations, which includes sufficient information to determine VOC emissions. These records shall be retained at the facility for at least five years and shall be made available to the Department upon request. [Rules 62-4.070(3) and 62-213.440, F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Aluminum Extrusion Press Lines and Painting Operations

A.8. Federal NESHAP Requirements: The painting operations/activities associated with Emission Unit No. 001 are subject to the applicable provisions* of the MACT standards of 40 CFR 63, Subpart Mmmm – Miscellaneous Metal Parts and Products (Surface Coating), as adopted and incorporated by reference in Rule 62-204.800(11)(b), F.A.C. These provisions are shown in their entirety in Appendix E, which is a part of this permit. Appendix E includes the applicable provisions of 40 CFR 63, Subpart A – General Provisions.

- * The following applicability references are based upon the permittee's construction applications dated October 05, 2009 (associated with construction permit 1050320-014-AC). Therefore, any change in operations may change the applicable provisions.

40 CFR 63 Subpart Mmmm Applicable Provision References

(Entire section applies unless otherwise noted with specific applicable subsection references)

What This Subpart Covers

63.3880 What is the purpose of this subpart?

63.3881 Am I subject to this subpart?

63.3881(a) through (c)

63.3881(e) through (e)(3)

63.3882 What parts of my plant does this subpart cover?

63.3883 When do I have to comply with this subpart?

63.3883(c)(1) and (d)

Emission Limitations

63.3890 What emission limits must I meet?

63.3890(a) and (c)

63.3891 What are my options for meeting the emission limits?

63.3891(a) and (b)

63.3892 What operating limits must I meet?

63.3892(a) and (c)

63.3893 What work practice standards must I meet?

63.3893(a)

General Compliance Requirements

63.3900 What are my general requirements for complying with this subpart?

63.3900(a)(1) and (b)

63.3901 What parts of the General Provisions apply to me?

Notifications, Reports, and Records

63.3910 What notifications must I submit?

63.3910(a) through (c)(8)(ii)

63.3910(10) and (11)

63.3920 What reports must I submit?

63.3920(a) through (a)(6)(iii)

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Aluminum Extrusion Press Lines and Painting Operations

63.3930 What records must I keep?

63.3930(a) through (c)(3)

63.3930(d) through (j)

63.3931 In what form and for how long must I keep my records?

Compliance Requirements for the Compliant Material Option

63.3940 By what date must I conduct the initial compliance demonstration?

63.3941 How do I demonstrate initial compliance with the emission limitations?

63.3942 How do I demonstrate continuous compliance with the emission limitations?

Compliance Requirements for the Emission Rate Without Add-On Controls Options?

63.3950 By what date must I conduct the initial compliance demonstration?

63.3951 How do I demonstrate initial compliance with the emission limitations?

63.3952 How do I demonstrate continuous compliance with the emission limitations?

Other Requirements and Information

63.3980 Who implements and enforces this subpart?

63.3981 What definitions apply to this subpart?

Table 3 to Subpart M MMM of Part 63 – Default Organic HAP Mass Fraction for Solvents and Solvent Blends

Table 4 to Subpart M MMM of Part 63 – Default Organic HAP Mass Fraction for Petroleum Solvent Groups

Appendix B to Subpart M MMM of Part 63 – Applicability of General Provisions to Subpart M MMM of Part 63

[Rules 62-204.800(11) and 62-213.400, F.A.C.; 40 CFR 63, Subpart M MMM]