FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

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LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Wastequip Manufacturing Company, LLC
33710 Oakville Road SW
Albany, OR 97321

Air Permit No. 1050324-008-AO
Permit Expires: 09/29/2019
Minor Air Operation Permit
Air Operation Permit Renewal

Authorized Representative:
Mr. Rick Daudert, Director, Environmental Health and Safety

This is the final permit to renew Air Operation Permit No. 1050324-006-AO for surface coating operations at a metal container manufacturing facility (Standard Industrial Classification No. 3499). The facility is located in Polk County at 2624 Mine Mill Lane in Lakeland, Florida. The UTM coordinates are Zone 17, 411.21 km East, and 3098.87 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to 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.

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. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this final permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. 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, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile 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 each 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 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 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 final permit. 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 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

for

9/29/2014

Kelley M. Boatwright — Effective Date
Permitting & Waste Cleanup 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 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 the date indicated below to the persons listed below.

Mr. Rick Daudert, Wastequip Manufacturing Company LLC (rdaudert@wastequip.com)

Danielle D. Henry, Compliance Assurance Program Team Leader Manager (danielle.d.henry@dep.state.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 9/29/2014

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The facility manufactures metal containers, such as steel dumpsters and roll-off boxes. Typical fabrication steps include the shearing and forming of sheet metal, welding, grinding, cleaning, and painting. There are currently three paint spray booths in operation at the facility. Volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions at this facility result from paints, thinners, and cleanup solvents. The existing facility consists of the following emissions unit (EU).

Facility ID No. 1050324

EU ID No.	Emissions Unit Description
001	Surface Coating Operations

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

Exempt Emission Sources/Activities

The following emissions units and/or activities are considered insignificant in accordance with the provisions of Rules 62-4.040(1)(b), F.A.C. *(insignificant emissions)*

- Welding
- Paint mix room
- Grinding operations (vent indoors)

Exemptions under Rule 62-4.040(1)(b), F.A.C. (insignificant emissions), may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- 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 (PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 1050324-006-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air and Solid Waste Permitting Program. The mailing address and phone number 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

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

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

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.

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.]

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.]

8. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of this 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.; and

c. copies of the most recent month of records/logs specified in Specific Condition Nos. A.6., A.7. (if daily records are required) and A.8.

[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.]

B. EU No. 001 Surface Coating Operations

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Surface Coating Operations - Paint Spray Booth No. 1 is located in the building adjacent to the dumpster fabrication building. VOC and HAPs are emitted uncontrolled though two 15' booth stacks with an approximate combined exhaust flow rate of 34,300 ACFM. Paint Spray Booth No. 2 is located in the roll-off fabrication building. VOC and HAPs are emitted uncontrolled through a 15' booth stack with an approximate exhaust flow rate of 28,800 ACFM. Particulate matter overspray emissions from Booth Nos. 1 and 2 are controlled by the use of panel filters. Paint Spray Booth No. 3 is located adjacent to Booth No. 1. The booth is a Col-Met Classic Auto/Truck Side Downdraft Drive Thru CATSDD26DT. Two fans each operating at 16,000 SCFM provide exhaust. VOC and HAPs are emitted uncontrolled through two 15' booth stacks with an approximate exhaust flow rate of 32,000 ACFM. The booth has a clear opening of 8' X 10'. Clean air flows into the booth through intake filters located in the ceiling of the booth and exits through the exhaust plenums located adjacent to the floor along the bottom of each side of the booth. The exhaust filters are fiberglass paint arrestor pads made specifically for the collection of paint overspray. A portable anemometer is used to measure air flow through the paint spray booth to assess the condition of the filters.

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 1050324-004-AC]

EMISSIONS STANDARDS

A.2. VOC and HAP Emission Limitations - Facility-wide emissions of volatile organic compounds (VOC) and total hazardous air pollutants (HAPs), as defined in Rule 62-210.200, F.A.C., shall not exceed the following:

Pollutant	Facility-Wide Emission Limits (tons/consecutive 12 month period)
Volatile Organic Compounds (VOC)	95.0
Total Hazardous Air Pollutants (HAPs)	5.0

[Rule 62-210.200("Potential to Emit"), F.A.C.; Construction Permit 1050324-004-AC]

A.3. Volatile Organic Compound Emissions and/or Organic Solvent 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 following procedures shall be utilized to minimize pollutant emissions:

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. tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use;

c. immediately confine and clean up VOC and/or solvent spills, and make sure wastes are placed in closed containers for reuse, recycling or proper disposal;

d. used cleanup solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations;

e. prevent excessive air turbulence across exposed VOC; and

f. conduct all spray painting operations inside the paint spray booths.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.; Construction Permit 1050324-004-AC]

A.4. Unconfined Particulate Matter Emissions - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include the use of panel-filter systems to control paint booth overspray emissions.
[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1050324-004-AC]

A.5. 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 (i.e. paint spray booth filters) operating properly. In order to provide reasonable assurance that the paint booth's overspray is being effectively controlled by the filters, visible emissions from the booth exhausts should not exceed 5% opacity. If said value is exceeded it will not be considered a violation in and of itself, but an indication that increased filter maintenance/replacement, or additional control precautions and/or practices may be required.
[Rules 62-4.070(3) and 62-210.650, F.A.C.; Construction Permit 1050324-004-AC]

RECORDKEEPING REQUIREMENTS

A.6. Monthly VOC and HAP Recordkeeping Requirements - A recordkeeping log shall be established and maintained to document compliance with Specific Condition No. A.2. At a minimum, the log shall identify and quantify each paint, coating, thinner, solvent, and other materials used in the painting operations which contain VOC and/or HAPs. At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC and HAP emissions, provided that no materials are used which are not purchased. 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). The permittee shall record and calculate, at a minimum, the following monthly:

a. facility name, facility ID No., emission unit ID No., and description (i.e., Wastequip Manufacturing Company, 1050324, EU 001, surface coating operations);

b. date;

c. density (lbs./gallon) and monthly usage of each paint, coating, thinner, solvent, and other material that contain VOC and/or HAPs (gallons);

d. VOC and individual HAP content (lbs./gallon) for each material listed in A.6.c. above;

e. calculated monthly total of VOC, individual HAP and total HAP emissions, in pounds or tons per month (based c. and d. above); and

f. cumulative total of VOC, individual HAP and total HAP emissions for the most recent consecutive 12 month period (tons per consecutive 12 month period).

Supporting documentation (MSD sheets, purchase orders, U.S. EPA "VOC DATA SHEETS", etc.) that includes sufficient information to determine VOC and HAP emissions shall be kept for each paint, coating, thinner, solvent, and other material used in the surface coating operations.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050324-004-AC]

A.7. Daily VOC and HAP Recordkeeping Requirements - If any month results in VOC emissions exceeding 80% of the major source threshold (i.e., 80.0 tons) for the most recent consecutive 12 month period, the facility shall keep records daily beginning on the next operational day following when the monthly calculation was completed. The permittee shall use this information to ensure that the VOC emissions for the upcoming, 12 consecutive month period do not exceed permit limitations. Should emissions of VOC for the 12 consecutive month period fall below 80.0 tons, the recordkeeping frequency may revert to monthly.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050324-004-AC]

A.8. Paint Spray Booth Filter Recordkeeping Requirements - Record the date of replacement of all paint spray booth filters and the initials of the operator who replaced the filters.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050324-004-AC]

A.9. Records Completion and Retention - The monthly records required by Specific Condition No. A.6., shall be completed by the 5th day of the following month. Daily records, if required by Specific Condition No. A.7., shall be completed within three (3) business days. The records shall be maintained at the facility in a form suitable for inspection by the Department upon request and shall be retained for at least a three (3) year period.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050324-004-AC]