



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

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Secretary

FINAL PERMIT

PERMITTEE

Phoenix Coating Resources, Inc.
P.O. Box 1439
Mulberry, FL 33860

Authorized Representative:
Mr. John M. Wehrung, President

Air Permit No.1050331-003-AF
Permit Expires: 11/04/2014
Federally Enforceable State Operating
Permit (FESOP)
Project Name: FESOP Renewal

This is the final air operation permit, which authorizes the operation of a phosphor-reclamation plant. The proposed work will be conducted at the Mulberry Site (Standard Industrial Classification No. 5093). The facility is located in Polk County at 2377 State Road 37, South in Mulberry, Florida. The UTM coordinates are Zone 17, 404.23 km East, and 3083.64 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

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.

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;
- (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

Mara Grace Nasca November 3, 2009
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 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 November 4, 2009 to the persons listed below.

Mr. John M. Wehrung, Phoenix Coating Resources, Inc. (jwphoenix@prodigy.net)

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 Grubbs November 4, 2009
(Clerk) (Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Phoenix Coating Resources, Inc.

For the operation of a phosphor-reclamation plant: Scrap, plastic material is received, cleaned and prepared for processing. Then, in a batch process, the plastic is treated with solvents to free the phosphor compound from the plastic. The contents of the batch are segregated into three constituents: (1) the phosphor compound, (2) un-dissolved plastic, and (3) spent solvent and dissolved plastic. The un-dissolved plastic is gathered for disposal as non-hazardous waste. A distiller separates the spent solvent from the dissolved plastic. The solvent is collected for reuse, and the distiller "bottom" is collected for disposal as a hazardous waste. A 250,000-BTU natural gas fired burner and commercial, lab-scale spray dryer – both exempt from permitting – are used to obtain larger agglomerates of ceramic dust. (At the applicant's request, specific information regarding this process is confidentially maintained by the Department.)

The existing facility consists of the following emissions units.

Facility ID No. 1050331	
ID No.	Emission Unit Description
001	Phosphor Reclamation Facility

Project Description

This project authorizes the renewal of air operation permit 1050331-002-AF for the operation of a phosphor-reclamation plant.

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

Exempt Emission Units/Activities

- A 250,000-BTU natural gas fired burner: used to obtain larger agglomerates of ceramic dust.
- A commercial, lab-scale spray dryer: used to obtain larger agglomerates of ceramic dust.

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 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 natural non-Title V source for fugitive emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

PERMIT HISTORY/AFFECTED PERMITS

Replaces FESOP No. 1050331-002-AF

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.
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. 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

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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/*](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 two months of records/logs specified in Specific Condition No. A.4.

[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.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Phosphor Reclamation Facility

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Phosphor Reclamation Facility

PERFORMANCE RESTRICTIONS

- A.1. Hours of 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.; FESOP 1050331-001-AF]

EMISSIONS STANDARDS

- A.2. Emission Limitations: The VOC and HAP emission operation limits for this emission unit are as follows:

Pollutant	Emission Limits (tons/any consecutive 12 month period)
Total Volatile Organic Compounds (VOC)	10.0
Individual Hazardous Air Pollutants (HAP)	5.0
Total Hazardous Air Pollutants (HAP)	10.0

[Rules 62-210.200(PTE) and 62-210.300(2)(a)1, F.A.C.; FESOP 1050331-001-AF]

- A.3. Volatile Organic Compounds Emissions (VOC): The permittee shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Pursuant to Rule 62-296.320(1)(a), F.A.C., the following procedures shall be utilized to minimize pollutant emissions:

- Maintain tightly fitting cover, lids, etc. on all containers of VOC when they are not being handled, tapped, etc.
- Prevent excessive air turbulence across exposed VOCs.
- Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc. of VOC so that it can be covered when not in use.
- All equipment, fittings, valve lines, pipes, drums, etc. shall be properly operated and maintained.
- All VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

[Rule 62-296.320(1)(a), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Phosphor Reclamation Facility

RECORDS AND REPORTS

A.4. Recordkeeping: In order to demonstrate compliance with Specific Condition No. A.2., the permittee shall keep records to support the VOC/HAP usage and emissions:

A. Monthly, calculate the following:

1. The usage* of all solvents containing VOCs and HAPs (Usage must be supported by inventory tallies of new solvents, recycled solvents, and solvent-bearing wastes.);
2. The total VOC content and total HAP content of each solvent;
3. The density of each solvent;
4. The total of VOC/HAP emissions for each month
5. The cumulative 12-month running total of VOC/HAP emissions to ensure the annual VOC/HAP emission limits are not exceeded.

Supporting documentation ("As Supplied" sheets, "As Applied" sheets, MSDS sheets, EPA data sheets, purchase orders, waste shipment/disposal records, etc.) that includes information to determine VOC and HAP emissions.

All records shall include the Facility Name, Facility ID, Emission Unit ID, Source Description, Date (Month, Day, and Year), and Operator Initials for each measurement. Monthly records shall be completed by the 10th day of the following month.

** At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC and HAP emissions, provided no materials are used which are not purchased. However, once implemented, the chosen option shall be indicated in the monthly log. Quantifying and recording the recycle-rate of solvents is not necessary if no credit is taken for the recycling of solvents.*

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

A.5. Record Retention: The records required in Specific Condition No. A.4. shall be recorded in a permanent form suitable for inspection by the Department upon request. The records shall be maintained onsite for a minimum of the most recent three (3) year period.

[Rules 62-4.070(3), 62-210.300(2)(b)1.e F.A.C.]