



# 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

Drum Recyclers, Inc.  
1491 14<sup>th</sup> Street NW  
Ft. Meade, FL 33841

Authorized Representative:  
Ms. Kaleigh Guy, President

Air Permit No. 1050415-003-AO  
Permit Expires: 02/12/2015  
Site Name : Drum Recyclers Ft. Meade  
Minor Air Operation Permit  
Project Name: Drum Reconditioning  
Facility

This is the final air operation permit, which authorizes operation of a drum reconditioning facility. The proposed work will be conducted at the Drum Recyclers Ft. Meade Site (Standard Industrial Classification No. 3412). The facility is located in Polk County at 1491 14<sup>th</sup> Street NW in Ft. Meade, Florida. The UTM coordinates are Zone 17, 420.39 km East, and 3071.68 km North.

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.

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 February 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 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 February 12, 2010 to the persons listed below.

Ms. Kaleigh Guy, Drum Recyclers, Inc. (kaleighdrumrecyclers@yahoo.com)  
Mr. Duane Alvarnaz, Drum Recyclers, Inc. (duanedrumrecyclers@yahoo.com)  
Mr. Dean H. Myers, P.E., General Environmental Engineering Inc. (deanhmyers@earthlink.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 Driskell February 12, 2010  
(Clerk) (Date)

Drum Recyclers, Inc.  
Drum Recyclers Ft. Meade

Air Permit No. 1050415-003-AO  
Project Name: Drum Reconditioning  
Facility

## SECTION 1. GENERAL INFORMATION (FINAL)

### FACILITY AND PROJECT DESCRIPTION

#### Drum Recyclers Ft. Meade

This facility is a drum reconditioning facility consisting of a drum reclamation furnace, two steel shot blasters, and two paint spray booths.

The existing facility consists of the following emissions units.

Facility ID No. 1050415	
ID No.	Emission Unit Description
001	Drum Reclamation Furnace with Afterburner
002	Steel Shot Blaster Booths (2)
003	Surface Coating Operations

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

#### Project Description

This is the initial air operation permit for this drum reconditioning facility.

#### Exempt Emission Units/Activities

The natural gas-fired drying oven with a maximum heat input of 3 MMBtu per hour is exempt from permitting requirements pursuant to Rule 62-210.300(3)(a)(33), F.A.C., Categorical and Conditional Exemptions.

### 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 synthetic non-Title V source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

### PERMIT HISTORY/AFFECTED PERMITS

Initial Operation Permit; Incorporates the terms and conditions of Construction Permit 1050415-002-AC.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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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

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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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 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. copies of the most recent compliance test reports required by Specific Condition No. B.11., if not previously submitted; and
  - d. copies of the most recent two months of records/logs specified in Specific Condition No(s). B.12., B.13., D.3. and D.4.(if required).

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

#### A. Facility-Wide Conditions

- 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.; Construction Permit 1050415-002-AC]
- A.2. General Standards: 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; and
  - e. conduct all spray painting operations inside the paint spray booths.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.]

- A.3. General Standards: Unconfined Particulates - 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 but not be limited to the following:
- a. maintenance of roads, parking areas and yards;
  - b. general housekeeping of areas where shot-blasting operations are conducted; and
  - c. the use of paint spray booth filters to control overspray emissions.

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

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

#### B. EU No. 001 Drum Reclamation Furnace with Afterburner

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	After arrival at the facility, the lids of previously used but empty drums are removed and both the lids and the drums are fed through a drum reclamation furnace (EU ID No. 001). The furnace has a maximum heat input capacity of 14 MMBtu/hour and sustains temperatures between 1,200° - 1,400° F to clean the used drums of any residue and remove old coatings. Exhaust from the furnace is routed to an afterburner to destroy remaining organics. Five auxiliary burners with a heat input capacity of 1 MMBtu/hour each combust natural gas in the afterburner to maintain a temperature at or above 1,400 °F for an approximate residence time of 2 seconds.

#### PERFORMANCE RESTRICTIONS

- B.1. Permitted Capacity: The maximum operation rate of the drum reclamation furnace shall not exceed:

Daily Average Maximum Throughput	Maximum Annual Throughput
360 drums and 360 lids per hour	400,000 drums and 400,000 lids per any 12 consecutive month period

[Rule 62-210.200(PTE), F.A.C.; Construction Permit 1050415-002-AC]

- B.2. Authorized Fuel: The furnace and afterburner shall be fired with natural gas only.  
[Rule 62-210.200(PTE), F.A.C.; Construction Permit 1050415-002-AC]

- B.3. Drum Incineration Restrictions: The following conditions apply to drums going through the drum reclamation furnace:

- a. Drums that contain residues are allowed to be incinerated only if those drums meet the following requirements:
  - (1) Drums that contain residues that are hazardous wastes as defined in 40 CFR 261, Subparts C and D, are allowed to be incinerated only if those drums meet the definition of empty containers as defined in 40 CFR 261.7. If the drums containing hazardous waste residues do not meet the empty drum criteria, the drums shall not be incinerated unless the facility obtains a hazardous waste incinerator permit in accordance with 40 CFR 264, Subpart O, and Rule 62-730.240, F.A.C.
  - (2) Drums containing residues that are non-hazardous waste are allowed to be incinerated only if those drums are empty containers.



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

#### B. EU No. 001 Drum Reclamation Furnace with Afterburner

*(Permitting Note - In the case of non-hazardous waste in Specific Condition No. B.3.a.(2), drums are considered "empty containers" if all wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating, and no more than 2.5 centimeters (one inch) of residue remains on the bottom of the container.)*

- b. Hazardous waste removed from the drums must be managed in accordance with 40 CFR 262, 264, and 265, and Chapter 62-730, F.A.C.
- c. No drums with burning residue on the interior or exterior may be allowed to leave the furnace's primary chamber.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050415-002-AC]

- B.4. Afterburner Operating Temperature: The minimum operating temperature of the afterburner shall be 1400° F.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050415-002-AC]

#### EMISSIONS STANDARDS

- B.5. Visible Emission (VE) Limit: Visible emissions associated with the drum reclamation furnace shall not exceed 5% opacity, except that visible emissions not exceeding 15% opacity are allowed for up to six minutes in any one hour period.

[Rule 62-296.401(1)(a), F.A.C.]

#### TESTING REQUIREMENTS

- B.6. VE Compliance Tests: During each federal fiscal year (October 1<sup>st</sup> to September 30<sup>th</sup>), the emissions unit shall be tested to demonstrate compliance with the emissions standards specified in Specific Condition B.5.

[Rule 62-297.310, F.A.C.; Construction Permit 1050415-002-AC]

- B.7. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rule 62-297.310(7)(a)9., F.A.C.]

- B.8. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

EPA Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

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

#### B. EU No. 001 Drum Reclamation Furnace with Afterburner

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

[Rules 62-204.800 and 62-297.100, F.A.C.; Appendix A of 40 CFR 60]

- B.9. Operation Rate During Testing - Testing of emissions shall be conducted while processing drums and lids with the emissions unit operating within 90 - 100% of its permitted capacity (324-360 drums/hr and 324-360 lids /hr), if feasible. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the permitted capacity; in this case, subsequent emissions unit operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then at any time the load exceeds 110% of the test load, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.; Construction Permit 1050415-002-AC]

#### NOTIFICATION REQUIREMENTS

- B.10. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. 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) and 62-297.310(7)(a)9., F.A.C.]

#### RECORDS AND REPORTS

- B.11. 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. The number of drums and/or lids processed (in drums/lids per hour) for the test period shall be included in the test report for each test. Failure to submit the actual processing rate for the test period and a copy of the daily log for the test day in the test report may invalidate the test and fail to provide reasonable assurance of compliance. 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 meet all applicable requirements of Chapter 62-297, F.A.C.

[Rules 62-297.310 and 62-297.310(8), F.A.C.]

- B.12. Afterburner Temperature Recorder - The permittee shall operate and maintain a continuous chart-recording device for monitoring the secondary chamber (afterburner) temperature. The operator shall initial and mark the chart upon initial introduction of drums after startup and upon completion of drum processing through the furnace.

[Rule 62-4.070(3), F.A.C.; Construction Permit 1050415-002-AC]

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

#### B. EU No. 001 Drum Reclamation Furnace with Afterburner

- B.13. Drum and Lid Processing Recordkeeping Requirements - In order to demonstrate compliance with the throughput limitations of Specific Condition No. B.1., the permittee shall record the following:

##### Daily

- a. facility name, facility ID No., emission unit ID No., and description (i.e., Drum Recyclers, Inc., 1050415, E.U. 001, drum reclamation furnace);
- b. day, month and year;
- c. total quantity of drums and lids processed each hour (drums and lids per hour) averaged daily\*;

##### Monthly

- d. total quantity of drums and lids processed each month (drums and lids per month); and
- e. cumulative total of the drums and lids processed during the most recent 12 consecutive month period (drums and lids per 12 consecutive month period).

(\* Note: Daily average is the number of drums processed daily, divided by the daily hours of furnace operation.)

Daily records shall be completed within 3 business days. Monthly records shall be completed by the end of the following month. The records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained at the facility for a minimum of the most recent three (3) year period.

[Rules 62-4.070(3) and 62-4.160, F.A.C.; Construction Permit 1050415-002-AC]

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

#### C. EU No. 002 Steel Shot Blaster Booths (2)

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
002	<p>Empty food-grade drums and lids are introduced into the processing line prior to the shot blaster booths because these drums and lids do not require processing in the drum reclamation furnace.</p> <p>Drums and lids from the drum reclamation furnace or food-grade drums and lids go to separate (drum or lid) steel shot blaster booths where they are shot blasted to remove dust and scale. The steel shot is collected and reused with make-up added as needed. Particulate matter (PM) emissions from the blasting operations are controlled by a single baghouse dust control device with a flow rate of 10,000 acfm.</p>

#### PERFORMANCE RESTRICTIONS

- C.1. Shot Blasting Operations- All shot blasting activities shall take place inside the shot blaster booths. In order to provide reasonable assurance that the emissions from the shot blaster booth are being effectively controlled by the baghouse, visible emissions from the shot blaster baghouse exhaust should not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but may be an indication that increased maintenance or additional control precautions and/or practices may be required.  
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050415-002-AC]

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

### D. EU No. 003 Surface Coating Operations

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
003	After exiting the steel shot blaster booths, drums and lids are rolled into separate (drum or lid) paint spray booths. The exterior and interior of the drums and lids are coated by up to 8 automatic paint spray guns. Overspray from the paint spray booths are controlled by the use of fabric filters with a control efficiency of 98%.

### PERFORMANCE RESTRICTIONS

- D.1. Paint Spray Booth Operations: In order to provide reasonable assurance that the paint booth 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.  
[Rule 62-4.070(3), F.A.C.; Construction Permit 1050415-002-AC]

### EMISSIONS STANDARDS

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

Pollutant	Emission Limitation
VOCs	75.0 tons per any 12 consecutive month period
Any Individual HAP	9.5 tons per any 12 consecutive month period
Total HAPs	23.5 tons per any 12 consecutive month period

[Rules 62-210.200(PTE), F.A.C.; Construction Permit 1050415-002-AC]

*(Permitting Note: Based on these emission limitations additional emission units/activities at the facility may not be eligible to utilize the Categorical Exemptions in Rule 62-210.300(3)(a), F.A.C., or the Generic and Temporary Exemptions in Rule 62-210.300(3)(b), F.A.C.)*

### RECORDS AND REPORTS

- D.3. Monthly VOC and HAP Recordkeeping Requirements - A recordkeeping log shall be established and maintained to document compliance with Specific Condition No. D.2. At a minimum, the log shall identify and quantify each paint, coating, thinner, solvent, and other material used in the surface coating operations which contain VOCs and/or HAPs. At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC/HAP emissions, provided that no materials are used which are not purchased.

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

### D. EU No. 003 Surface Coating Operations

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., Drum Recyclers, Inc., 1050415, E.U. 003, surface coating operations);
- b. month and year;
- c. density (lbs/gallon) and monthly usage of each paint, coating, thinner, solvent, and other material that contains VOCs and/or HAPs (gallons);
- d. VOC and individual HAP content (lbs/gallon) for each material listed in D.3.c. above;
- e. calculated monthly total of VOCs, individual HAP and total HAP emissions, in pounds or tons per month (based on D.3.c. and d. above); and
- f. cumulative total of VOCs, individual HAP and total HAP emissions for the most recent 12 consecutive month period (tons per 12 consecutive 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.]

- D.4. Daily HAP Recordkeeping Trigger - If any month results in individual or total HAP emissions equaling or exceeding 90% of the limits contained in Specific Condition D.2. (i.e., 8.55 tons or 21.15 tons) for the most recent 12 consecutive month period, the monthly records required above shall then be kept daily and a prior 365 day individual or total HAP emission (as applicable) shall be recorded every day. These daily logs shall be kept until the most recent 12 consecutive month total (see D.3.f. above) goes below 8.55 tons or 21.15 tons (as applicable). The "purchase" option shall not be used when daily logs are required. The permittee shall use this information to ensure that the individual and total HAP emissions for the upcoming, 12 consecutive month period do not exceed permit limitations. Should individual or total HAP emissions for the 12 consecutive month period fall below 8.55 or 21.15 tons respectively, the recordkeeping frequency shall revert to monthly.

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