



Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Interim Secretary

PERMITTEE

SAPA Extrusions St. Augustine, LLC.
200 Riviera Boulevard
St. Augustine, Florida 32086

Authorized Representative:
Will Staller, Plant Manger

Air Permit No. 1090447-017-AC
Permit Expires: 08/07/2016
Minor Air Construction Permit

St. Augustine Facility
Throughput Increase Remelt
Furnace, Holding Furnace and
No.1 & No.2 Homogenizing
Furnaces, and addition of Age
Oven G

PROJECT

This is the final air construction permit, which authorizes a throughput increase for the existing Remelt Furnace (EU 004), the existing Holding Furnace (EU 003,) and the existing No.1 and No.2 Homogenizing Furnaces (EU 005). The feed/charge rate of the Remelt Furnace will increase from 30 tons per hour /operating cycle to a maximum of 37.5 tons per hour/ operating cycle. The maximum annual feed/charge of the Remelt Furnace will increase from 80,000 tons/12 consecutive months to 108,000 tons/ 12 consecutive months. The Holding Furnace (EU 003) operates in series with the Remelt Furnace and is authorized to hold only *clean charge as defined by 40 CFR 63.1503 (molten aluminum received from the Remelt Furnace)*. Therefore, the feed/charge rate of the Holding Furnace (EU 003) will increase consistent with the Remelt Furnace from 30 tons per hour /operating cycle to a maximum of 37.5 tons per hour/ operating cycle and the maximum annual feed/charge will increase from 80,000 tons/12 consecutive months to 108,000 tons/ 12 consecutive months. The total maximum annual feed/charge rate for the No. 1 and No. 2 Homogenizing Furnaces (EU 005) is based on the maximum feed/charge of the Remelt Furnace (EU 004) and; therefore, will also increase to a combined maximum annual feed/charge rate not to exceed 108,000 tons/ 12 consecutive months. This project also authorizes the addition of a new exempt aged oven – Aged Oven G to the list of Exempt Emissions Units/ Activities at the facility.

The proposed work will be conducted at the existing SAPA Extrusions St. Augustine facility, which is a Secondary Aluminum Production Facility categorized under Standard Industrial Classification No. 3354 & 3341. The existing facility is located in St Johns County at 200 Riviera Boulevard, in St. Augustine, Florida. The UTM coordinates are Zone 17, 470.98 km East; 3296.85 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and 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.

DRAFT CONSTRUCTION PERMIT

STATEMENT OF BASIS

This air pollution construction 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.



Richard S. Rachal III, P.G.
Permitting Program Administrator
Permitting Program

FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that this Construction permit and all copies were sent before the close of business on August 07, 2015 to the listed persons.



Clerk

August 7, 2015
Date

Mr. Will Staller, Plant Manager SAPA Extrusions St. Augustine, LLC. (will.staller@sapagroup.com)
Mr. Jason Floyd, Environmental Engineer SAPA Extrusions St. Augustine, LLC.:
(Jason.Floyd@sapagroup.com)
Mr. Kennard F. Kosky, P.E Golder Associates, Inc.: (kkosky@golder.com)

SAPA Extrusions St. Augustine, LLC
Throughput Increase Remelt, Holding & No.1 & No.2 Homogenizing Furnaces
& Addition of Aged Oven G

Air Permit No. 1090447-017-AC
Minor Air Construction Permit

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

SAPA Extrusions North America, LLC is a secondary aluminum production facility. The standard industrial classification (SIC) codes for the facility's activity are 3354 (extruded aluminum products) and 3341 (secondary smelting and refining of non-ferrous metals). The facility consists of an aluminum melting furnace, a holding furnace, two homogenizing furnaces, aluminum extrusion operations, powder paint operations, and ancillary operations.

The remelt facility or cast house contains natural gas fired melting and holding furnaces, an in-line argon fluxer/degasser, casting pit and homogenizing furnaces. Clean and painted scrap aluminum mixed with prime (ingot, sows) is loaded into the melting furnace in pre-determined ratios.

Hot dross is skimmed from the molten aluminum and cooled prior to stockpiling in the dross room pending transport to an off-site facility for metal recovery. Molten aluminum is fed from the melting furnace to the holding furnace. Alloying materials may be added during this transfer and while the metal is being stirred in the holder. The metal is transferred from the holding furnace to the casting table for vertical, direct-chill casting into logs. During the transfer from the holder to the casting process, the in-line fluxer or degassing unit injects argon gas into the molten metal.

Degassing removes hydrogen, oxides and other impurities that can lead to formation of porosity/inclusions in the solidified metal. The cast aluminum logs are placed in a homogenizer for heat treatment to achieve uniform grain size in the metal prior to saw cut for shipment to an extrusion plant.

Extrusion operations occur via three aluminum press operations and two drawn tube operation. Aluminum billets are heated and extruded through various dies to form various shaped products. Aluminum tubes and shapes are further processed in age ovens and drawn tubing and OPC departments age ovens for heat treating. In some areas (GDT and OPC), aluminum tubes are dipped into a solvent tank to remove drawing oils.

The facility also operates a paint line that consists of a horizontal electrostatic powder coat operation.

Before the aluminum can be painted, it must go through a pretreatment process in which the metal is cleaned and etched, then coated with a microscopic layer of chrome which helps the paint adhere to the aluminum and also provides some underlying corrosion protection (chromium conversion pretreatment). The horizontal pretreatment line is operated in open tanks.

Aluminum parts are placed in racks and then dipped into the first pretreatment tank of a 3-5 percent sodium hydroxide caustic solution. The solution is heated to approximately 120 degrees F by steam generated from the Paint Line Boiler (insignificant emissions unit). This pretreatment aids in the removing of surface oils from the aluminum and provides a slight etch.

The aluminum parts then are dipped in a water rinse tank followed by the chromium conversion bath. The chromium bath consists of 1-2 percent chromium, 3-6 percent phosphoric acid, less than 0.07 percent hydrofluoric acid, and the balance water. The solution is heated to 120-130 degrees F by steam also generated from the Paint Line Boiler. This treatment coats the aluminum so that the powder paint will adhere and also provides some corrosion protection should the finished painted product becomes chipped or the paint comes off the aluminum. Following the chromium conversion bath, the aluminum parts are dipped into a water rinse tank before being sent to a drying oven. The aluminum parts are then taken out of the racks, hung on an overhead conveyor that carries the parts through the automatic powder-paint spray operation followed by the bake oven.

The paint line includes ancillary equipment, including a pyrolysis oven for the removal of overspray paint from the paint line equipment (parts and conveyor hooks).

SECTION 1. GENERAL INFORMATION

The existing facility consists of the following emissions units.

Facility ID No. 1090447	
ID No.	Emission Unit Description
001	Surface Coating Operations
003	Holding Furnace
004	Remelt Furnace
005	No. 1 and No. 2 Homogenizing Furnaces
006	OPC Solvent Tank
009	GDT Solvent Tank
010	In-line Fluxer

PROPOSED PROJECT

SAPA is requesting a throughput increase for the existing Remelt Furnace (EU 004), the existing Holding Furnace (EU 003), and the existing No.1 and No.2 Homogenizing Furnaces (EU 005). The facility is requesting a proposed feed/charge rate increase of the Remelt Furnace from 30 tons per hour /operating cycle to a maximum of 37.5 tons per hour/ operating cycle and a maximum annual feed/charge increase from 80,000 tons/12 consecutive months to 108,000 tons/ 12 consecutive months. The Holding Furnace (EU 003). operates in series with the Remelt Furnace and is authorized to hold only *clean charge as defined by 40 CFR 63.1503 (molten aluminum received from the Remelt Furnace)*. Therefore, the feed/charge rate of the Holding Furnace (EU 003) will increase consistent with the Remelt Furnace from 30 tons per hour /operating cycle to a maximum of 37.5 tons per hour/ operating cycle and the maximum annual feed/charge will increase from 80,000 tons/12 consecutive months to 108,000 tons/ 12 consecutive months. The total maximum annual feed/charge rate for the No. 1 and No. 2 Homogenizing Furnaces (EU 005) is based on the maximum feed/charge of the Remelt Furnace (EU 004) and; therefore, will also increase to a combined maximum annual feed/charge rate not to exceed 108,000 tons/ 12 consecutive months. The facility also plans to add a 2.5 MMBtu/hr natural gas fired age oven, Age Oven G. Pursuant to Rule 62-210.300(3)(b)1., F.A.C. based on information submitted the proposed age oven is exempt from the requirement to obtain an air construction permit and Non-TV Permit.

This project will modify the following emissions units.

Facility ID No. 1090447	
ID No.	Emission Unit Description
<i>Regulated Emissions Unit</i>	
003	Holding Furnace Remelt Furnace
004	Remelt Furnace
005	No. 1 and No. 2 Homogenizing Furnaces

SECTION 1. GENERAL INFORMATION

This project will add the following emission unit/activity to the list of Exempt Emissions Units/Activities.

Emission Unit Description
<i>Exempt Emissions Units</i>
Age Oven G (2.5 MMBtu/hr – natural gas)

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
 - The facility does not operate 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.
- The facility is a synthetic Non-Title V source and Non PSD Source

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District, Permitting Program, Florida Department of Environmental Protection (Department). The Northeast District's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, (904) 256-1700. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to Northeast District Office, Compliance Assurance at: The mailing address and phone number of the Northeast District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, (904) 256-1700.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements), 40 CFR 63 Subpart A - General Provisions, and 40 CFR 63, Subpart RRR - National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production..
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: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Construction and Expiration. The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(4), 62-4.080 & 62-210.300(1), F.A.C.]
8. Source Obligation:
 - a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4)

SECTION 2. ADMINISTRATIVE REQUIREMENTS

through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

9. Application for Non-Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Non-TV operation permit is required for regular operation of the permitted emissions unit. A completed Application for Air Permit - Non Title V Source (DEP Form No. 62-210.900(3), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test results as required by this permit.

[Rules 62-4.030, 62-4.050, and 62-4.220 F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. EU 003 Holding Furnace, EU 004 Remelt Furnace and EU 005 No. 1 & No. 2 Homogenizing Furnaces

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
003	<p>Holding Furnace: The Holding Furnace is classified as a Group 2 furnace used as a holding furnace for molten aluminum processed in the Remelt Furnace. The Holding Furnace or the “North furnace” is manufactured by Thorpe Technologies. It has one emissions point (stack height: 51’ 4”, inside diameter 67”) and the emissions are uncontrolled. The holding furnace is a Group 2 furnace as defined in 40 CFR 63.1503.</p> <p>The unit is subject to 40 CFR 63, Subpart RRR - National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production.</p>
004	<p>Remelt Furnace: The Remelt Furnace is a melting furnace authorized to process either clean charge or aluminum that contains 35 % by weight of total charge of aluminum that contains paint, lubricants, coatings, or other foreign materials. The Remelt Furnace or the “South furnace” is manufactured by Thorpe Technologies. It has one uncontrolled emissions point (stack height: 51’ 4”, inside diameter: 67”). The Remelt Furnace can operate as either a Group 1 or Group 2 furnace as defined by 40 CFR 63.1503. Such operation is defined as an Alternate Method of Operation in accordance with Rule 62-210.200(197), F.A.C.</p> <p>The unit is subject to 40 CFR 63, Subpart RRR - National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production.</p>
005	<p>No.1 & No.2 Homogenizing Furnaces: No. 1 and No. 2 Homogenizing Furnaces are for heat treatment of the aluminum logs to achieve uniform grain size in the metal prior to saw cut. The furnaces are natural gas fired with maximum heat input rate of each furnace rated at 36 MMBtu/hour. Each furnace has one emissions point and the emissions are uncontrolled</p>

PERFORMANCE RESTRICTIONS

A.1. Existing Permits and Regulations: This permit supplements all previous permits issued for the above named emissions units. These conditions supersede corresponding similar conditions specified in previous air construction permits. However, if not specifically regulated by this permit, the standards and permit requirements from previous air construction permits remain valid. The Permittee shall continue to comply with the conditions of those permits.

[Rule 62-4.070, F.A.C.]

A.2. Permitted Capacity:

- a. Remelt Furnace:** The maximum feed/charge¹ shall not exceed 37.5 tons per hour operating cycle². The maximum annual feed/charge shall not exceed 108,000 tons per 12 consecutive months.
- b. Holding Furnace (Group 2 Furnace):** The Holding Furnace operates in series with the Remelt Furnace and shall not operate independently. The maximum feed/charge¹ shall not exceed 37.5 tons per hour operating cycle². The maximum annual feed/charge shall not exceed 108,000 tons per 12 consecutive months

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. EU 003 Holding Furnace, EU 004 Remelt Furnace and EU 005 No. 1 & No. 2 Homogenizing Furnaces

¹ *Feed/charge* means, for a furnace or other process unit that operates in batch mode, the total weight of material (including molten aluminum, T-bar, sow, ingot, etc.) and alloying agents that enter the furnace during an operating cycle. For a furnace or other process unit that operates continuously, *feed/charge* means the weight of material (including molten aluminum, T-bar, sow, ingot, etc.) and alloying agents that enter the process unit within a specified time period (e.g., a time period equal to the performance test period).

² *Operating cycle* means the period including the charging and melting of scrap aluminum and the fluxing, refining, alloying, and tapping of molten aluminum (the period from tap-to-tap).

- c. **No. 1 and No. 2 Homogenizing Furnaces:** The maximum annual feed/charge rate for the Homogenizing furnaces combined shall not exceed 108, 000 tons per 12 consecutive months.

[Rule 62-210.200(PTE), F.A.C., 40 CFR 63.1503 (definition: feed/charge and operating cycle), Rule 62-212.400(12), F.A.C., and Application No. 1090447-017-AC.

PERFORMANCE TESTING REQUIRED BY THIS CONSTRUCTION PERMIT

Performance test/compliance demonstration

- A.3. **Remelt Furnace Initial Compliance Tests:** The Remelt furnace shall be tested to demonstrate initial compliance for the emissions standards for Dioxin/Furan (D/F). The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit.

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

- A.4. **Remelt Furnace Initial Performance Test for Dioxin/Furan (D/F):** The owner or operator shall conduct a single performance test for (D/F) at the Remelt Furnace. The performance test shall be conducted in accordance with the requirements in 40 CFR 63.1511 and while the Remelt Furnace is operating at

- 1) a feed/charge of 37.5 tons per operating cycle, and
- 2) processing 35% (by weight of the total charge mixture) aluminum that contains paint, lubricants, coatings, or other foreign materials.

The performance test shall consist of three separate runs and the pollutant sampling for each run shall be conducted over the entire process operating cycle.

[Application No. 1090447-017-AC, and Rule 62-4.070, F.A.C. 40 CFR 63.1511 (b) 40 CFR 63.1512 (e)]

- A.5. **Testing of Emissions:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity as stated in **Specific Condition A.4**. If it is impractical to test at permitted capacity, an emissions

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. EU 003 Holding Furnace, EU 004 Remelt Furnace and EU 005 No. 1 & No. 2 Homogenizing Furnaces

unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. If an emissions unit is tested at less than the testing capacity, another emissions test shall be conducted and completed no later than 60 days after the emissions unit operation exceeds 110% of the capacity at which its most recent emissions test was conducted. Permitted capacity is defined as at least 90% of the maximum operation rate specified by the permit.

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

- A.6. Site Specific Test Plan:** Prior to conducting the performance test as described by **Specific Condition No. A4.**, the owner or operator shall prepare and submit to the Department a site-specific test plan in accordance with 40 CFR 63.7(c)(2). The Department will approve or disapprove the submitted test plan in accordance with 40 CFR 63.7(c)(3).

[Rule 62-4.070, F.A.C. and 40 CFR 63.1511(a)]

- A.7. Remelt Furnace Subsequent Test: Test for Dioxin/Furan (D/F):** After the initial compliance test subsequent test for D/F shall be conducted every five years, as stated in **Specific Condition A4.** In addition to the requirements specified in **Specific Condition Nos. C.32. through No. C.34 of Permit No. 1090447-015-AF.**, compliance test procedures shall also meet all applicable requirements of Chapter 62-297, F.A.C.

[Rule 62-297.310(7)(a)3., F.A.C. & Rule 62-4.070(3), F.A.C.;]

- A. 8. Test Methods:** Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Method for Determining Particulate Matter Emissions
23	Method for the concentration of D/F
26A	Method for Determining the concentration of HCl.

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

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

NOTIFICATION RECORDS AND REPORTS

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. EU 003 Holding Furnace, EU 004 Remelt Furnace and EU 005 No. 1 & No. 2 Homogenizing Furnaces

A.9. Notification Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

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

A.10. 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.

[Rule 62-297.310(10), F.A.C.]

REVISIONS TO PREVIOUSLY ISSUED INITIAL FESOP NO. 1090447-012-AF

Remelt Furnace (Emissions Unit 004): Specific Condition C.2. of Permit No. 1090447-012-AF is revised to Specific Condition No. A 2.a. of Subsection B of this construction permit.

Holding Furnace (Emissions Unit 003): Specific Condition B.2. of Permit No. 1090447-012-AF, is revised to Specific Condition No. A2.b. of Subsection B of this construction permit.

No. 1 & No.2 Homogenizing Furnaces (Emissions Unit 005): Specific Condition D.2. of Permit No. 1090447-012-AF is revised to Specific Condition No. A2.c of Subsection B of this construction permit.

[Application No. 1090447-017-AC received 06/19/15; Rules 62-4.070(3) and 62-4.080, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection B. Revision to Facility-Wide VOC Emissions CAP Condition 2 of Permit No. 1090447-015-AF

This permit makes the changes identified below with strikethrough and underline font to Facility-Wide Condition 2, of Section 3.of Initial FESOP No. 1090447-012-AF and FESOP No. 1090447-015-AF:

2. Facility Wide VOC Emissions Cap: The total maximum allowable facility wide VOC emissions from all operations at the facility shall not exceed 82.0 tons per any 12-consecutive month period.

Compliance with the VOC emissions cap shall be demonstrated, by the recordkeeping requirements of Facility-wide Condition 4, with all valid VOC emissions data including, but not limited to solvent and coating storage, cleanup, fugitive emissions, VOC emissions from the Holding Furnace (EU 003), VOC emissions from the Remelt Furnace (EU 004), VOC Emissions from the Nos. 1 and 2 Homogenizing Furnaces (EU 005), and VOC emissions from the emissions units and pollutant emitting activities that meet an exemption from air permitting pursuant to Rule 62-210.300(3), F.A.C.

VOC emissions shall be based on the premise that all VOCs applied or used are emitted to the atmosphere.

[Application No. 1090447-017-AC; Permit No. 1090447-013-AC; Rule 62-4.070(3), F.A.C; Rule 62-210.200, F.A.C.(PTE)]