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Gainesville, FL 32606  
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RECEIVED

NOV 6 1990

DER-BAQIM

November 2, 1990  
B-2309

*Check*

*141 Tpy  
129 Tpy +  
7 Tpy  
136 Tpy  
or  
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35.34T*

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1985  
148  
19  
199*

Office of General Counsel  
Florida Department of  
Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399

RE: Alumax Extrusions, Inc.  
Industrial Park Drive  
Plant City, Florida 33566

- Permits #AC29 170100 Vertical Paintline
- #AC29 170101 Horizontal Paintline
- #AC29 181096 Number 2 Cast House

Dear Reader:

This correspondence is a request for extension of time to file a petition for administrative hearing pursuant to Section 17-103.070, Florida Administrative Code. As engineer of record for Alumax Extrusions, Inc., I have discussed this request with Ms. Teresa Heron of the Bureau of Air Regulation and I believe that an extension of time is needed.

The notice of intent to issue permits #AC29-170100, AC29-170101 and AC29-181096 was received on October 29, 1990. My review of the draft permits as well as the technical evaluation and preliminary determination have raised several questions as to applicability, intent and compliance determinations.

Therefore, I request an extension of time until November 26, 1990 to allow for discussions with Ms. Heron prior to possibly filing a petition for an administrative hearing. By copy of this letter, I would like to schedule a meeting in the FDER Tallahassee office on November 15, 1990 at 10 AM.

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Office of General Counsel  
November 2, 1990  
Page 2

I have prepared the attached listing of my questions and concerns per the specific items of the draft permits and the technical evaluation and preliminary determination.

Please let me know if you have any questions concerning this request.

Sincerely,

BAKER ENVIRONMENTAL ENGINEERING, INC.

*Bob Baker*

Robert A. Baker, P.E.

xc: Mr. Tim Kinsley - Alumax  
Mr. Wes Harrell - Alumax  
Mr. Darrell Graziani - HCEPC  
Ms. Teresa M. Heron - FDER

petition.let

BAKER

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LIST OF QUESTIONS AND COMMENTS

Technical Evaluation and Preliminary Determination

- 1) Page 5 - Figure 1 is not correct for showing the schedule of the melt furnaces and is probably meant to be Figure 2. Therefore, the correct Figure 1 is missing.
- 2) Page 7 - Alumax has not agreed to install air pollution controls to the paintlines but rather, intends to do so at some future time.

*O.K change*

*intends, will need to be clarify*

Permits AC29-170100 & AC29-170101 Vertical and Horizontal Paintlines

- 3) The expiration date varies throughout permit AC29-170100 from 10/30/91 to 10/31/91.
- 4) Specific Condition 5 - Please cite the regulatory reference for the 5% VE limit rather than the 20% VE limit in FAC 17-2.610 (2).
- 5) Specific Condition 6 - The maximum limits on the use of extrusions in A, B and D would unreasonably limit Alumax's ability to increase its mileage efficiency (i.e. more pounds of extrusions per gallon of paint). The proposed limits were derived from our submitted information. However, these production data were taken from annual averages and/or current production maximums and were not intended to be used as permitted maximums.

*O.K to be corrected*

*O.K*

*2.620 (1)*

*reasonable*

Therefore, we request that production limits on the amount of extrusions be eliminated and a statement be added referring back to the existing permit #A029-161797 for the extrusion process and its specific production limits (7382 lbs/hr, 7488 hrs/yr and 55.3 X 10<sup>6</sup> lbs/yr).

*Other limits look for right number - gallons VOC*

- 6) Specific Condition 6F - The minimum limit of 60 tons per year of VOC's in the wastes would not allow waste minimization efforts at the plant. It is suggested that a specific quantity for wastes be eliminated from the permit and that the facility be limited to hourly and annual emission of VOC's based on the suggested testing and recordkeeping requirements of the other specific conditions.
- 7) Specific Condition 7 - The actual requirements are

*7 O.K see current Woodbury of all total emission from calculation not to exceed 1136*

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difficult to follow. Please clarify.

Our understanding is that the EPA Method 24 testing will be performed by the paint manufacturer. ✓ Alumax will add to these results the information as to dilution of the paints with solvents (on the EPA forms). ✓ Prior to use of any new paints this information will be sent to HCEPC as proper notification. Do we need to supply any more information? Do we need to resupply this information on the existing paints prior to filing for an operating permit?

*ask HCEPC, not same as existing permits*

8) Specific Condition 8 - Instead of analyzing the batch of wastes that is suspected to have the highest VOC content, we suggest analyzing a composite quarterly sample similar to the RCRA procedures. These results would give better data for the VOC emission calculations.

*ask HCEPC*

9) Specific Condition 12 - The way that the condition reads is to have all doors in the facility closed during periods of spraying. The actual spraying areas are vented but do not have doors. We suggest dropping the reference to closing doors.

*O.K.*

10) Specific Condition 13 - The wording that "any" spills, etc. must be notified to the HCEPC is questioned as to intent and applicable regulation. We suggest that the wording of "any" be changed to "reportable quantities as per SARA".

*ok*

11) Specific Condition 14 - It would be very difficult to do calculations for air toxics based on actual conditions since the actual spraying rates, meteorological conditions and type of paints vary constantly. We suggest worst case calculations to comply with this requirement. A worst case screening approach is attached for your review.

*O.K. John and Cleveland will handle*

Also, it is unclear if these calculations are required for existing paints, in addition to the information previously submitted, or for only new paints. When must these calculation be submitted (before or after spraying)?

*[Handwritten mark]*

12) Specific Condition 16 - Is the notification prior to testing meant for stack test or all paint testing etc.?

*both*

*will objectionable metal and animal cleaning*

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Permit AC29-181096 No. 2 Cast House

*send one*

- 13) Page 2 is missing.
- 14) Specific Condition 5 - Please cite the regulatory reference for the 5% VE limit rather than the 20% VE limit in FAC 17-2.610 (2).

15) Specific Condition 12 - Calculations based on actual conditions would be difficult to do. We suggest a worst case screening model similar to that performed by for the particulate emissions.

*delete*  
*from*

16) Specific Condition 13 - Calculations of SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC emissions based on actual conditions would be difficult to do. We suggest use of EPA AP-42 Emission Factors in calculations for the same time period as the particulate stack test and then, annually thereafter as part of the annual emission report.

*delete*

*0.12 from*  
*may be* *etc.*

17) Specific Condition 13 - The last sentence is unclear. What compliance test would be required if the opacity exceeds 5%? Does this refer to the melter or the baghouse or both? How does this condition relate to specific condition 10? Please cite regulatory reference.

*et plaus*

General Comment

18) The actual data in the draft permits and technical evaluation and preliminary determination (i.e. lb/hr, tpy, etc.) are currently being reviewed for correctness per the large amount of information submitted to FDER. Therefore, comments as to the accuracy of the data will be deferred until our meeting.

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**BAKER**  
ENVIRONMENTAL ENGINEERING, INC.

# ALUMAX

SUGGESTED PROCEDURES  
FOR  
FUTURE PAINT USE

OCT/90

6821 S.W. Archer Road, Gainesville, FL 32608

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PROCEDURES FOR COMPLYING WITH THE FLORIDA AIR TOXIC POLICY

Step 1 Prior to use of any new coating, obtain the following information from the MSDS for each compound listed on the MSDS and record on the air toxic data form:

- o Chemical name and CAS number
- o TLV in mg/m<sup>3</sup>
- o % by weight

Step 2 Look up the annual no threat level (NTL) from Table 1 for each compound. Record NTL on the air toxic data form.

Step 3 Use Table 2 for each compound as follows:

- o Find the TLV in column one and the corresponding maximum weight percentage (%) for 8 hours and 24 hours for the VPL operating alone; the HPL operating alone; and the VPL and HPL operating simultaneously. Record on the air toxic data form.
- o Find the NTL in the 8th column and the corresponding maximum weight percentage (%) for the annual case of the VPL operating alone, the HPL operating alone, and the VPL and HPL operating simultaneously. Record on the air toxic data form.

Step 4 Compare the maximum weight percentage with the actual percentage from the MSDS.

If the maximum weight percentage is less than the actual percentage, the paint can be used.

If the maximum percentage is greater than the actual percentage, the paint can not be used until additional calculations are performed to restrict the paint usage or spraying time.

Step 5 Submit the air toxic data form to Wes Harrell.

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10/08/90

ALUMAX2\MAXCHART

NO NTL VS. MAX ?

HR	24 HR	ANNUAL
2544.1	2024.5	280.5
1874.1	1066.9	185.7
2545.1	2093.8	359.3

INPUT

INPUT

TLV (MG/M3)	8 HOUR MAX. WT. %			24 HOUR MAX. WT. %			NTL (UG/M3)	ANNUAL MAX. WT. %		
	VPL	HPL	VPL+HPL	VPL	HPL	VPL+HPL		VPL	HPL	VPL+HPL
0.1	0.03	0.05	0.03	0.01	0.02	0.01	0.1	0.04	0.05	0.03
0.2	0.06	0.11	0.06	0.02	0.04	0.02	0.2	0.07	0.11	0.06
0.3	0.08	0.16	0.08	0.04	0.07	0.03	0.3	0.11	0.16	0.08
0.4	0.11	0.21	0.11	0.05	0.09	0.05	0.4	0.14	0.22	0.11
0.5	0.14	0.27	0.14	0.06	0.11	0.06	0.5	0.18	0.27	0.14
0.6	0.17	0.32	0.17	0.07	0.13	0.07	0.6	0.21	0.32	0.17
0.7	0.20	0.37	0.20	0.08	0.16	0.08	0.7	0.25	0.38	0.19
0.8	0.23	0.43	0.23	0.09	0.18	0.09	0.8	0.29	0.43	0.22
0.9	0.25	0.48	0.25	0.11	0.20	0.10	0.9	0.32	0.48	0.25
1	0.28	0.53	0.28	0.12	0.22	0.11	1	0.36	0.54	0.28
2	0.56	1.07	0.56	0.24	0.45	0.23	2	0.71	1.08	0.56
3	0.85	1.60	0.85	0.35	0.67	0.34	3	1.07	1.62	0.83
4	1.13	2.13	1.13	0.47	0.89	0.45	4	1.43	2.15	1.11
5	1.41	2.67	1.41	0.59	1.12	0.57	5	1.78	2.69	1.39
6	1.69	3.20	1.69	0.71	1.34	0.68	6	2.14	3.23	1.67
7	1.98	3.74	1.97	0.82	1.56	0.80	7	2.50	3.77	1.95
8	2.26	4.27	2.26	0.94	1.79	0.91	8	2.85	4.31	2.23
9	2.54	4.80	2.54	1.06	2.01	1.02	9	3.21	4.85	2.50
10	2.82	5.34	2.82	1.18	2.23	1.14	10	3.57	5.39	2.78
15	4.23	8.00	4.23	1.76	3.35	1.71	15	5.35	8.08	4.17
20	5.64	10.67	5.64	2.35	4.46	2.27	20	7.13	10.77	5.57
25	7.05	13.34	7.05	2.94	5.58	2.84	25	8.91	13.46	6.96
30	8.46	16.01	8.46	3.53	6.69	3.41	30	10.70	16.16	8.35
35	9.88	18.68	9.87	4.12	7.81	3.98	35	12.48	18.85	9.74
40	11.29	21.34	11.28	4.70	8.93	4.55	40	14.26	21.54	11.13
45	12.70	24.01	12.69	5.29	10.04	5.12	45	16.04	24.23	12.52
50	14.11	26.68	14.10	5.88	11.16	5.69	50	17.83	26.93	13.92
55	15.52	29.35	15.51	6.47	12.27	6.25	55	19.61	29.62	15.31
60	16.93	32.02	16.92	7.06	13.39	6.82	60	21.39	32.31	16.70
65	18.34	34.68	18.34	7.64	14.51	7.39	65	23.17	35.00	18.09
70	19.75	37.35	19.75	8.23	15.62	7.96	70	24.96	37.70	19.48
75	21.16	40.02	21.16	8.82	16.74	8.53	75	26.74	40.39	20.87
80	22.57	42.69	22.57	9.41	17.85	9.10	80	28.52	43.08	22.27
85	23.98	45.36	23.98	10.00	18.97	9.67	85	30.30	45.77	23.66
90	25.39	48.02	25.39	10.58	20.08	10.23	90	32.09	48.47	25.05
95	26.81	50.69	26.80	11.17	21.20	10.80	95	33.87	51.16	26.44
100	28.22	53.36	28.21	11.76	22.32	11.37	100	35.65	53.85	27.83
150	42.32	80.04	42.31	17.64	33.47	17.06	150	53.48	80.78	41.75
200	56.43	106.72	56.42	23.52	44.63	22.74	200	71.30	107.70	55.66
250	70.54	133.40	70.52	29.40	55.79	28.43	250	89.13	134.63	69.58
300	84.65	160.08	84.62	35.28	66.95	34.11	300	106.95	161.55	83.50
350	98.76	186.76	98.73	41.16	78.11	39.80	350	124.78	188.48	97.41
400	112.86	213.44	112.83	47.04	89.27	45.49	400	142.60	215.40	111.33
450	126.97	240.12	126.94	52.92	100.42	51.17	450	160.43	242.33	125.24
500	141.08	266.79	141.04	58.80	111.58	56.86	500	178.25	269.25	139.16
550	155.19	293.47	155.14	64.68	122.74	62.54	550	196.08	296.18	153.08
600	169.30	320.15	169.25	70.56	133.90	68.23	600	213.90	323.10	166.99
650	183.40	346.83	183.35	76.44	145.06	73.91	650	231.73	350.03	180.91
700	197.51	373.51	197.46	82.32	156.22	79.60	700	249.55	376.95	194.82
750	211.62	400.19	211.56	88.21	167.37	85.29	750	267.38	403.88	208.74
800	225.73	426.87	225.66	94.09	178.53	90.97	800	285.20	430.80	222.66
850	239.84	453.55	239.77	99.97	189.69	96.66	850	303.03	457.73	236.57
900	253.94	480.23	253.87	105.85	200.85	102.34	900	320.86	484.65	250.49
950	268.05	506.91	267.98	111.73	212.01	108.03	950	338.68	511.58	264.40
1000	282.16	533.59	282.09	117.61	223.17	113.72	1000	356.51	538.50	278.32



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UMAX EXTRUSIONS  
TOXIC DATA FORM

NT # \_\_\_\_\_  
E \_\_\_\_\_  
RATOR \_\_\_\_\_

PAINT OK TO USE (Y OR N) \_\_\_\_\_

IF NO CIRCLE LIMITING MAX. %

INFORMATION FROM MSDS  
CHEMICAL CAS # TLV % WT  
(MG/M3)

FROM TABLE 1:  
ANNUAL NTL  
(UG/M3)

FROM TABLE 2:  
8 HOUR MAX % WT.  
VPL HPL VPL+HPL  
(UG/M3 (UG/M3) (UG/M3)

12 HOUR MAX % WT.  
VPL HPL VPL+HPL  
(UG/M3 (UG/M3) (UG/M3)

ANNUAL MAX % WT.  
VPL HPL VPL+HPL  
(UG/M3 (UG/M3) (UG/M3)

