

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

Mr. J. M. Murphy  
Vice President  
Drum Service Company of Florida  
Post Office Box 278  
Zellwood, Florida 32798


May 15, 1986

Enclosed is Permit Number AC 48-114677 to Drum Service Company of Florida which authorizes the construction of a thermal oxidizer, paint spray booths, and baking ovens at your drum reclamation plant in Zellwood, Orange County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301; 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 of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

Copies furnished to:

Frank Cross, P.E.  
Tom Sawicki  
Jeff Pallas

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on May 16, 1986 to the listed persons.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Patricia G. Adams May 16, 1986  
Clerk Date

Final Determination

Drum Service Company of Florida  
Orange County  
Zellwood, Florida

Thermal Oxidizer, Paint Spray Booths and Baking Ovens

Permit Number: AC 48-114677

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

May 14, 1986

## Final Determination

Drum Service Company of Florida's application for a permit to construct a thermal oxidizer, paint spray booths, and baking ovens at their facility in Zellwood, Orange County, Florida has been reviewed by the Bureau of Air Quality Management. Public Notice of the department's Intent to Issue the permit was published in the Apopka Chief on April 11, 1986.

Copies of the preliminary determination have been available for public inspection at the St. Johns River District office in Orlando and the Bureau of Air Quality Management office in Tallahassee.

Comments on the proposed permit conditions were received and discussed at a meeting on April 3, 1986, with Mr. J. M. Murphy and members of the Bureau of Air Quality Management.

Mr. Murphy requested that Specific Condition No. 1 be changed to allow operation limits of 72 hours per week. Because the permit limits total production at the facility, an increase in permitted hours of operation will not change the total permitted emissions. The permitted hours of operation will be changed to 72 hours per week, 3,744 hours per year.

Mr. Murphy feels that Specific Condition No. 3 is restrictive because it limits the amounts of coatings and solvents used in the coating operations. Drum Service submitted these consumption levels in the application and stated that these were the maximum achievable levels. The evaluation of these levels gave the department the "reasonable assurance" that the permitted allowable emission rates would not be violated. Specific Condition No. 3 will not change.

Specific Condition No. 7 requires demonstration of capture efficiency. Mr. Murphy discussed a problem his facility has in measuring the capture efficiency of the drying ovens. The burners used to heat the drying ovens draw their combustion air from the drying ovens. Because of this, some of the captured volatiles will be destroyed by the burners and any measured capture will be understated. An EPA document (Controlling Pollution from the Manufacturing and Coating of Metal Products, Volume 1, 1977) and a study by the Whittaker Laboratory conservatively show a capture of 40% in the drying oven. The use of this 40% capture efficiency in the drying ovens will still show the sources in compliance with the permitted allowable limits. Due to the special circumstances of these drying ovens, the requirement for measuring capture efficiency will be deleted and an assumed capture efficiency of 40% will be used.

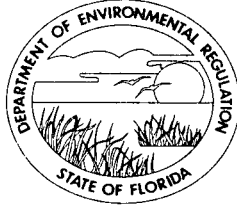
Mr. Murphy requests that the use of reference Method 25 in Specific Condition No. 8 be changed to Method 25A. Specific Condition No. 8 will be changed to read "...using EPA Method 25 or another method approved by the department."

Mr. Murphy expressed concern about operating the spray booths at the maximum permitted operating conditions. This issue was resolved at the meeting and no change will be made to Specific Condition No. 10.

The final action of the department will be to issue the permit with the changes discussed above.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

**PERMITTEE:**  
Drum Service Company of Florida  
803 Jones Avenue  
Zellwood, Florida 32798

Permit Number: AC48-114677  
Expiration Date: June 30, 1987  
County: Orange  
Latitude/Longitude: 28° 43' 55"N/  
81° 36' 45"W  
Project: Thermal Oxidizer, Paint  
Spray Booths, and Baking  
Ovens

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the construction of three spray lines and a thermal oxidizer (incinerator).

The construction/installation shall be in accordance with the permit application and plans, documents, amendments, and drawings, except as otherwise noted on pages 5-8 of the "Specific Conditions".

**Attachments:**

1. Application to construct Air Pollution Sources, DER Form 17-1.202(1).

PERMITTEE:  
Drum Service Company of  
Florida

Permit Number: AC48-114677  
Expiration Date: June 30, 1987

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:  
Drum Service Company of  
Florida

Permit Number: AC48-114677  
Expiration Date: June 30, 1987

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.



PERMITTEE:  
Drum Service Company of  
Florida

Permit Number: AC48-114677  
Expiration Date: June 30, 1987

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:  
Drum Service Company of  
Florida

Permit Number: AC48-114677  
Expiration Date: June 30, 1987

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. The time of operation for each spray paint booth shall not exceed 72 hours per week, 3,744 hours per year.
2. Total output of all spray lines shall not exceed 550 drums per hour and 575,000 drums per year.

PERMITTEE:  
Drum Service Company of  
Florida

Permit Number: AC48-114677  
Expiration Date: June 30, 1987

SPECIFIC CONDITIONS:

3. Use of coatings and solvents shall not exceed the following gallons per hour and gallons per year.

	Gallons per hour	Gallons per year
Exterior Paints	34.3	35,820
Linings	10.6	12,254
MEK	1.4	1,672
Diacetone	0.9	1,035
Toluol	0.5	535

4. The emissions of VOC shall not exceed the following:

	Maximum lbs/hr	tons/yr
Tight Head Line	55.30	25.13
Openhead Line	106.40	61.77
Lids Line	15.30	8.88

5. Compliance with these limits shall be demonstrated on a 24 hour basis.

6. The emissions of VOC shall equal the amount of VOC, excluding water, delivered to the coating applicator less the amount of VOC destroyed by the incinerator.

PERMITTEE:  
Drum Service Company of  
Florida

Permit Number: AC48-114677  
Expiration Date: June 30, 1987

**SPECIFIC CONDITIONS:**

7. Destruction efficiency of the incinerator shall be demonstrated by determining the inlet and outlet VOC emissions using EPA Method 25 or another method approved by the department. Dividing the outlet concentration by the inlet concentration will provide the penetration. Destruction Efficiency (Percent) =  $(1 - \text{Penetration}) \times 100$

8. Determination of the VOC content and the density of the coating as applied shall be demonstrated by EPA Method 24 and as provided by the vendor(s).

9. Compliance tests shall be performed at maximum operating conditions. 95% total destruction of all VOC delivered to the inlet of the incinerator shall be demonstrated by these compliance tests.

10. The Department and EPA shall be notified, in writing, 15 days in advance of the EPA Method 25 and Method 24 compliance tests.

11. The quantity of all coatings and solvents used shall be recorded daily and a report shall be submitted quarterly to DER's St. Johns River District office.

12. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit. (Rule 17-4.09 Florida Administrative Code)

13. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the Department's St. Johns River District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rule 17-4.22 and 17-4.23 Florida Administrative Code.)

Permittee:  
Drum Service Company of  
Florida

Permit Number: AC48-114677  
Expiration Date: June 30, 1987

**SPECIFIC CONDITIONS:**

14. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application (Rule 17-4.10 Florida Administrative Code).

Issued this 14 day of May, 1986

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
VICTORIA J. TSCHINKEL, Secretary