



United States Compliance

---

April 13, 2005

Ms. Cindy Phillips, P.E.  
FDEP, Bureau of Air Regulation  
MS 5505  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Re: Windsor Metal Specialties, Inc. (0970042-005-AV)  
NESHAP Initial Notification— Windsor Metal Specialties, Inc.**

Dear Cindy Phillips:

This letter is to notify the Florida Department of Environmental Protection that Windsor Metal Specialties, Inc., located in Kissimmee, Florida will be subject to the Miscellaneous Metal Parts and Products NESHAP.

This letter was prepared by United States Compliance Corporation using information supplied by the facility. Please contact me by phone at United States Compliance Corporation headquarters or by email at [adosdall@uscompliance.com](mailto:adosdall@uscompliance.com) if there are any questions or concerns.

Sincerely,

Andy Dossdall  
Environmental Specialist

Enclosures

cc: Dave Bond, Compliance Supervisor, Windsor Metal Specialties, Inc.

d: Alan Zahn, CD

RECEIVED  
APR 29 2005  
BUREAU OF AIR REGULATION

### Initial Notification Report

Applicable Rule: 40 CFR Part 63, Subpart A — National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A — General Provisions. Initial notification is being made in accordance with §63.9(b).

*Note: Initial notification reports are due not later than 120 calendar days after the effective date of the relevant standard, or within 120 calendar days after the source becomes subject to the relevant standard. Sources may also use the application for approval of construction or reconstruction under §63.5(d) to fulfill the initial notification requirement.*

*If you are a new or reconstructed major source, you must also include information required under 63.5(d) and 63.9(b)(5) - the Application for Approval of Construction or Reconstruction. You may use the Application for Approval of Construction and Reconstruction as your initial notification. (§63.5(d)(1)(ii)).*

#### SECTION I GENERAL INFORMATION

A. Print or type the following information for each facility for which you are making initial notification: (§63.9(b)(2)(i)-(ii))

Operating Permit Number (OPTIONAL)		Facility I.D. Number (OPTIONAL)	
0970042-005-AV			
Responsible Official's Name/Title			
Malcolm Brant/ President			
Street Address			
1820 Avenue A			
City	State	ZIP Code	
Kissimmee	Florida	34742-1210	
Facility Name (if different from Responsible Official's Name)			
Windsor Metal Specialties, Inc.			
Facility Street Address (If different than Responsible Official's Street Address)			
Facility Local Contact Name		Title	Phone (OPTIONAL)
Dave Bond		Compliance Supervisor	
City	State	ZIP Code	
Kissimmee	Florida	34742-1210	

B. Indicate the relevant standard or other requirement that is the basis for this notification and the source's compliance date: (§63.9(b)(2)(iii))

Basis for this notification (relevant standard or other requirement)	Anticipated Compliance Date (mm/dd/yy)
40 CFR Part 63 Subpart MMMM	1/8/07

#### SECTION II SOURCE DESCRIPTION

A. Briefly describe the nature, size, design, and method of operation of the source. (§63.9(b)(2)(iv))

The facility contains a surface coating operation consisting of a power washer, drying oven, six paint spray booths where primer, top and/or clear coating materials are electrostatically applied to miscellaneous metal/aluminum parts, a cure oven, and a thermal oxidizer. The paint spray booths are equipped with dry filters, which provide a particulate reduction efficiency of approximately 98 to 99 percent. Painted parts from the spray booths are routed to a cure oven for drying. The VOC exhaust from the cure oven is ducted to a thermal oxidizer, which provides VOC destruction efficiency of approximately 95 percent. The exhaust from the thermal oxidizer is ducted to the drying oven, which is utilized to dry the washed parts prior to painting. The facility also includes miscellaneous fugitive emissions from the following activities: mixing, coatings with solvents and pigments, spray gun cleaning, solvent recovery and recycling, air drying of cleaned paint containers, and hand lay-up/air drying of touch up paint and finish coatings.

B. Briefly describe the types of emission points within the affected source and the types of hazardous air pollutants emitted. (§63.9(b)(2)(iv))

**Types of Emission Points**

The facility contains a surface coating operation consisting of a power washer, drying oven, six paint spray booths where primer, top and/or clear coating materials are electrostatically applied to miscellaneous metal/aluminum parts, a cure oven, and a thermal oxidizer. The paint spray booths are equipped with dry filters, which provide a particulate reduction efficiency of approximately 98 to 99 percent. Painted parts from the spray booths are routed to a cure oven for drying. The VOC exhaust from the cure oven is ducted to a thermal oxidizer, which provides VOC destruction efficiency of approximately 95 percent. The exhaust from the thermal oxidizer is ducted to the drying oven, which is utilized to dry the washed parts prior to painting. The facility also includes miscellaneous fugitive emissions from the following activities: mixing, coatings with solvents and pigments, spray gun cleaning, solvent recovery and recycling, air drying of cleaned paint containers, and hand lay-up/air drying of touch up paint and finish coatings.

**Types of HAPs Emitted**

HAPs emitted at this facility include, but not limited to, toluene, xylene, xylene (mixed), ethylbenzene, ethylbenzene, formaldehyde, glycol ethers, methanol.

C. Check the box that applies: (§63.9(b)(2)(v))

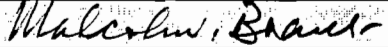
- My facility is a major source of Hazardous Air Pollutants (HAPs)
- My facility is an area source of HAPs

*NOTE: A major source is a facility that emits or has the potential to emit greater than 10 tons per year of any one HAP or 25 tons per year of multiple HAPs. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line, not just inside the facility itself.*

**SECTION III**

**CERTIFICATION** (Note: Certification is Optional – not required under §63.9(b). You may edit the text in this section as deemed appropriate)

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
Malcolm Brant	President	
Signature of Responsible Official		
 <span data-bbox="792 538 917 585">PRES.</span> <span data-bbox="1242 538 1437 585">4-26-05</span>		

*Note 1: Initial notification forms should be sent to the EPA Regional Office servicing your area and to your State or local Air Pollution Control Agency. Part 70 permit applications can be used in lieu of an initial notification provided: (1) the same information is contained in the permit application as required by this rule; (2) the State has an approved Title V program under Part 70; (3) the State has received delegation of authority by the EPA; and (4) the Title V permit application has been submitted to the permitting authority. (§63.9(a))*

*Note 2: Responsible official is defined under §63.2 as any of the following: the president, vice-president, secretary, or treasurer of the company that owns the plant; the owner of the plant; the plant engineer or supervisor; a government official if the plant is owned by the Federal, State, city, or county government; or a ranking military officer if the plant is located on a military installation.*