Metal Industries, Inc.
Bushnell Facility
Facility ID No.: 1190007
Sumter County

Initial Title V Air Operation Permit
DRAFT Permit No.: 1190007-002-AV

Permitting Authority
Florida Department of Environmental Protection
Southwest District
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Initial Title V Air Operation Permit
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Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
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Virginia B. Wetherell
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Permittee:
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Clearwater, FL 34618-4490

DRAFT Permit No.: 1190007-002-AV
Facility ID No.: 1190007
SIC Nos.: 34, 3499
Project: Initial Title V Air Operation Permit

This permit is for the operation of the Metal Industries, Inc. Bushnell Facility. This facility is located at 400 West Walker Avenue, Bushnell, Sumter County; UTM Coordinates: Zone 17, 390.7 km East and 3171.0 km North; Latitude: 28° 40' 53" North and Longitude: 82° 07' 06" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix E-1, List of Exempt Emissions Units and/or Activities
APPENDIX TV-1, TITLE V CONDITIONS (version dated 2/27/97)

Effective Date:
Renewal Application Due Date:
Expiration Date:
(dates will be filled in at final issuance)
FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/ep

Section I. Facility Information.

Subsection A. Facility Description.

This facility manufactures aluminum air distribution products (grilles and registers). The regulated emissions units are two continuous painting lines. Paint Line No. 1 consists of ovens, cleaning tanks. paint spray booths, and electrodeposition vats. Paint Line No. 2 consists of ovens, a washing tank, and a paint spray booth. Also included in this permit are miscellaneous exempt emissions units and/or activities.

Based on the initial Title V permit application received June 10, 1996, this facility is a major source of Hazardous Air Pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
016	Paint Line No. 1
017	Paint Line No. 2

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; they are, however, specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History / ID Number Transfers
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements

These documents are on file with permitting authority:
Initial Title V Permit Application received June 10, 1996.

Additional Information Request dated December 17, 1996
Additional Information Response received May 6, 1997

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS (version dated 2/27/97), is a part of this permit. {Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).
[Rule 62-296.320(4)(b)1., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:

a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
b. certification forms and/or RMPs according to the promulgated rule schedule.

[40 CFR 68]

5. Exempt Emissions Units and/or Activities. Appendix E-1, List of Exempt Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

6. Not federally enforceable. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) 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. This shall include, but not be limited to, the following:

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. All VOC/OS compounds from solvent washing (equipment cleanup) shall be directed into containers that prevent evaporation into the atmosphere.

[Rule 62-296.320(1)(a), F.A.C.; Permit Nos. AO60-251965 & AO60-175392]

7. Not federally enforceable. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the use of water wash booths or fiber filters to control paint spray booth overspray emissions.
[Rule 62-296.320(4)(c)2., F.A.C.]

8. The "Statement of Compliance" required to be submitted to this office and the EPA shall be submitted at the same time as the Annual Operating Report. **Note to Permittee:** see Appendix TV-1, Nos. 23 and 51.
[Rules 62-4.070(3), 62-213.420(4), and 62-213.440(3), F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Air Program of the Department's Southwest District.

10. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions, or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7)(b), F.A.C.]

Permitting Notes:

Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Permit Renewal - see Appendix TV-1, item 5

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
016	Paint Line No. 1

This emissions unit is a continuous painting conveyor line used to paint/coat aluminum air distribution products. The products are processed by passing through 7 pre-treatment tanks (3 of which are warmed with propane heaters), a dry-off oven, 3 electrodeposition vats, 3 post-rinse tanks, a dehydration oven, 4 touch-up paint spray booths, and a bake oven prior to packaging/shipping. The processes that make up the continuous painting conveyor line were previously permitted separately as E.U. ID Nos. 01 - 09. This newly defined emissions unit (E.U. ID No. 016) incorporates the processes as a single emissions unit. The process emission sources consist of the following:

Propane Combustion Sources	Max. Heat Input Rate (mmBtu/hr)
Pre-Treatment Tank No. 1 (alkaline immersion) w/heater	1.5
Pre- Treatment Tank No. 3 (cleaner) w/heater	3.5
Pre- Treatment Tank No. 5 (phosphate coating) w/heater	3.5
Dry-Off Oven	2.0
Dehydration Oven	2.5
Bake Oven	6.0

Coating/Paint Sources
3 Electrodeposition Vats (uncontrolled)
3 DeVilbiss Model TEL-1289-125 Paint Touch-Up Booths, each controlled by a DeVilbiss Turbo-Clean Model XWE-6371 low water wash spray booth scrubber rated at 17,000 ACFM.
1 Touch-Up Paint Spray Booth fabricated by Metal Industries, Inc. controlled by fiber filters and rated at 9143 ACFM.

The following conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. The hours of operation for this emissions unit shall not exceed 7488 hours/year.
[Rule 62-210.200(PTE), F.A.C.; Permit Nos. AC60-104252, AC60-130974, AC60-130971, AC60-130972, AC60-130960, AC60-130968, AC60-130966, AC60-130976]

A.2. Methods of Operation - (Fuels). The ovens and heaters shall be fired with propane only.
[Rule 62-213(410), F.A.C.]

Emission Limitations and Standards

A.3. VOC emissions from the use of paints/coatings, thinners, and cleanup solvents shall not exceed 22.69 lbs/hr (weekly average basis) and 84.95 tons/calendar year.
[Permit Nos. AC60-104252, AC60-130974, AC60-130971, AC60-130972, AC60-130960, AC60-130968, AC60-130966, AC60-130976, AO60-251965]

A.4. Not federally enforceable. In order to provide reasonable assurance that the paint spray booth control equipment (water wash curtains and fiber filters) are being adequately maintained, visible emissions from the paint spray booths shall not exceed 5% opacity. Exceedance of this limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary.
[Rule 62-4.070(3), F.A.C.]

Test Methods and Procedures

A.5. This emissions unit is subject to the conditions contained in Subsection C. Common Conditions. (See Condition Nos. C.1. - C.6.)

Recordkeeping and Reporting Requirements

A.6. A daily log shall be kept for usage of paints/coatings, thinners, and cleanup solvents to document compliance with the limitations of condition Nos. A.1. and A.3. The log shall contain, at a minimum, the identity and quantity each paint/coating, thinner, and cleanup solvent used, the operation (electrodeposition vat, paint spray booth, or cleanup), and the daily hours of operation.

Documentation of the solvent used for cleanup shall use a mass balance to determine usage (amount used for cleanup minus amount collected for disposal or recycle). The daily log shall be reconciled weekly to verify compliance with the hourly VOC emission limitation of condition No. A.3. The log shall also include a weekly year to date total of the hours of operation and VOC emissions to verify compliance with condition Nos. A.1. and A.3. The permittee shall retain supporting documentation (MSD sheets, purchase orders, etc.) for all paints/coatings, thinners, and cleanup solvents indicated on the logs.
[Permit Nos. AC60-104252, AC60-130974, AC60-130971, AC60-130972, AC60-130960, AC60-130968, AC60-130966, AC60-130976, AO60-251965]

Subsection B. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
017	Paint Line No. 2

This emissions unit is a paint spray line used to paint/coat aluminum air distribution products. The products are processed by passing through a washer, a DeVilbiss paint spray booth, and the main bake oven. A cleaning oven is used to remove paint residue from the racking hardware. The ovens and heater are fired only on propane. The processes that make up the paint spray line were previously permitted separately as E.U. ID Nos. 10 - 14. This newly defined emissions unit (E.U. ID No. 017) incorporates the processes as a single emissions unit. The process emission sources consist of the following:

Propane Combustion Sources	Max. Heat Input Rate (mmBtu/hr)
Water Heater	1.5
Dry-Off Oven	3.5
Main Bake Oven	4.5
Clean Oven	0.625

Coating/Paint Sources
Paint Spray Booth controlled by a DeVilbiss Turbo-Clean Model XWE-6371 low water wash spray booth rated at 17,500 ACFM.

Permitting note: The Clean Oven is regulated under Rule 62-296.401(1), F.A.C. Stationary Sources - Emission Standards - Incinerators.

The following conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The Clean Oven operation rate shall not exceed 25 pieces/cleaning cycle.
[Rule 62-210.200(PTE), F.A.C.; Title V permit application received June 10, 1996]
Note: The cleaning cycle is approximately 5 hours.

B.2. Methods of Operation - (Fuels). The ovens and heater shall be fired with propane only.
[Rule 62-213(410), F.A.C.]

B.3. Hours of Operation. The hours of operation for this emissions unit shall not exceed 7488 hours/year.
[Rule 62-210.200(PTE), F.A.C.; Permit No. AC60-164950]

Emission Limitations and Standards

B.4. VOC emissions from the use of paints/coatings, thinners, and cleanup solvents shall not exceed 3.18 lbs/hr (weekly average basis) and 11.9 tons/calendar year.
[Permit No. AC60-164950]

B.5. No visible emissions (5 percent opacity) are allowed from the Clean Oven except that visible emissions not exceeding 20 percent opacity are allowed for up to three minutes in any one hour period.
[Rule 62-296.401(1)(a), F.A.C.]

B.6. In order to provide reasonable assurance that the paint spray booth control equipment (water wash curtain) is being adequately maintained, visible emissions from the paint spray booth shall not exceed 5% opacity. Exceedance of this limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary.
[Rule 62-4.070(3), F.A.C.; Permit No. AC60-164950]

Test Methods and Procedures

B.7. This emissions unit is subject to the conditions contained in Subsection C. Common Conditions. (See Condition Nos. C.1. - C.4.)

Recordkeeping and Reporting Requirements

B.8. A daily log shall be kept for usage of paints/coatings, thinners, and cleanup solvents to document compliance with limitations of condition Nos. B.3. and B.4. The log shall, at a minimum, identify and quantify each paint/coating, thinner, and cleanup solvent used, the operation (paint spray booth or cleanup), and the daily hours of operation. Documentation of the solvent used for cleanup shall use a mass balance to determine usage (amount used for cleanup minus amount collected for disposal or recycle). The daily log shall be reconciled weekly to verify compliance with the hourly VOC emission limitation of condition No. B.4. The log shall also include a weekly year to date total of the hours of operation and VOC emissions to verify compliance with condition Nos. B.3. and B.4. The permittee shall retain supporting documentation (MSD sheets, purchase orders, etc.) for all paints/coatings, thinners, and cleanup solvents indicated on the logs.
[Rule 62-4.070(3), F.A.C.; Permit No. AC60-164950]

B.9. Not federally enforceable. A log shall be kept for every cycle of operation of the Clean Oven to document compliance with condition B.1. The log shall contain, at a minimum, the number of pieces cleaned/cycle and the length of the cleaning cycle.
[Rule 62-4.070(3), F.A.C.]

Subsection C. Common Conditions.

E.U. ID No.	Brief Description
016	Paint Line No. 1
017	Paint Line No. 2

The following conditions apply to the emissions unit(s) listed above:

C.1. Baseline date is not federally enforceable Tests Required.

a. The Clean Oven (two stacks) shall be tested for visible emissions annually within 60 days prior to the baseline date of August 28.

b. The paint spray booth exhausts (Paint Line No. 1 - four stacks; Paint Line No. 2 - one stack) shall be tested for visible emissions in the 6-month period prior to applying for renewal of this operating permit.

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

C.2. Test Methods. Compliance with the visible emission limitation for the Clean Oven shall be determined using DEP Method 9, contained in Chapter 62-297, F.A.C. Compliance with the visible emission limitation for the paint spray booths shall be determined using EPA Method 9, referenced in Chapter 62-297, F.A.C. The visible emissions test duration shall be a minimum of 60 minutes for the Clean Oven and 30 minutes each for the paint spray booths. The minimum requirements for stationary point source test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
[Rules 62-297.310(4)(a)2, 62-297.401(9)(a) & 62-297.401(9)(c), F.A.C.]

C.3. Test Notification. The permittee shall notify the Department at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner. [Rule 62-297.310(7)(a)9., F.A.C.]

C.4. Test Reports. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide, at minimum, the information required in Rule 62-297.310(8), F.A.C. A statement of the operation rate during each test shall be included. [Rule 62-297.310(8), F.A.C.]

Appendix E-1, List of Exempt Emissions Units and/or Activities.

Metal Industries, Inc.	**DRAFT Permit No.:** 1190007-002-AV
Bushnell Facility	**Facility ID No.:** 1190007

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C. provided that the exempt emissions units shall be subject to any applicable emissions limiting standards and the emissions from the exempt emissions units or activities shall be considered in determining whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C. are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Emergency generators not to exceed 400 operating hours/year
2. Brazing, soldering, and welding activities
3. Sanding equipment
4. Fire and safety equipment
5. Portable gasoline and diesel powered equipment
6. Propane and gasoline powered forklifts
7. Laboratory equipment and testing activities
8. Steam cleaning activities
9. Space heating
10. Industrial wastewater treatment activities
11. Adhesive activities
12. Plastic wrapping and heat sealing activities
13. EPA Trivial List of Activities ("White Paper 2")