

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

December 31, 1998

CERTIFIED MAIL

Mr. Mark E. Kirby
Plant Manager
Florida Production Engineering, Inc.
2 Tower Circle West
Ormond Beach, FL 32174-8759

RE: Status of Application Review -- Request for Additional Information
DEP File No. 1270102-004-AC

Dear Mr. Kirby:

The Air Toxic Permitting Unit has reviewed the proposed MACT application received on December 2, 1998. However, your application remains incomplete. Please provide the following information promptly. Evaluation of your proposed project will continue to be delayed until all requested information has been received.

Please provide the following information in order to complete review of your application pursuant to Chapters 120 and 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4.070(1) and 62-204 through 62-297.

1. Transfer efficiency is defined as the ratio of solids adhering to solids sprayed. Please elaborate on how a 40% transfer efficiency was determined.
2. The EPA in its September 1998 Preliminary Industry Characterization report indicated that there are 396 facilities in 33 states performing plastic coating. Are any of these facilities similar in operation/production to Florida Production Engineering proposed project? If yes, did operation/production begin after July 1, 1997? If yes, what are the actual emissions?
3. In the proposed case-by-case MACT Determination, an "original" and "modified" process was described. Please provide a detailed list of the materials used in the "original" process and the materials substituted to reduce overall HAP constituents.
4. The proposed MACT attributes a 20% overall reduction in coating consumption to the replacement of four (4) spray guns with a programmable robotic arm. In order to receive credit, the comparison in combined coating usage should be based on the same

P 263 584 709

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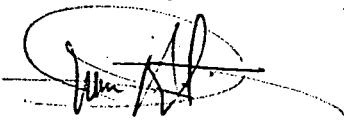
amount of parts coated with both processes. With the "modified" process, what would be the combined coating usage for 3,528,000 parts?

5. Figure 4, "Materials Flow Diagram" does not appear to be consistent with the narrative description regarding the topcoat spray booth. It states that the topcoat with catalyst usage is 20.2 gals/day. However, the narrative description on page 2 states that the topcoat by itself is 20.2 gallons/day/cell and the catalyst usage is 3.37 gallons/day/cell. Therefore, it appears that Figure 4 should list topcoat w/catalyst at 23.37 gallons/day. If this interpretation is correct, please resubmit the potential emissions, including the pertinent pages of the application.
6. In the application at Section H, please elaborate on the origin of the following emission factors: 5.035, 1.77, .076 and 0.814 lbs/gal.
7. The "modified" process states that the coating formulation is 5.02 lbs of VOC per gallon of coating. Please explain why 5.5 lbs/gallon is being requested as MACT?
8. The proposed case-by-case MACT Determination indicated that studies were conducted on add-on controls. Please provide a copy of those studies.

Note that all submittals must be signed and sealed by a professional engineer registered in the state of Florida.

If you have any questions, please contact Lennon Anderson at 850/921-9588. When referring to this project, please use the file number indicated.

Sincerely,



Lennon Anderson
Air Permitting Engineer

cc: William Kinell, HH Management
Alan Zahm, CD

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 Plant Manager
 Florida Production Engineering, Inc.
 2 Tower Circle West
 Ormond Beach FL 32174-8759

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AC
Florida production engineering corp

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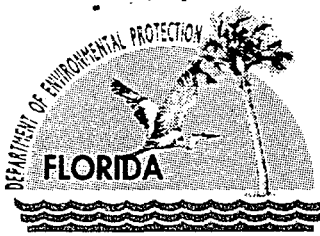
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BUREAU OF
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Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

February 19, 1999

CERTIFIED MAIL

Mr. Mark E. Kirby
Plant Manager
Florida Production Engineering, Inc.
2 Tower Circle West
Ormond Beach, FL 32174-8759

RE: Status of Application Review -- Request for Additional Information
DEP File No. 1270102-004-AC

Dear Mr. Kirby:

The Air Toxic Permitting Unit has reviewed the response to the Department's request for additional information received on January 22, 1999. However, your application remains incomplete. Please provide the following information promptly. Evaluation of your proposed project will continue to be delayed until all requested information has been received.

Please provide the following information in order to complete review of your application pursuant to Chapters 120 and 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4.070(1) and 62-204 through 62-297.

1. In item 2 of your response, it was indicated that representatives of Florida Production Engineering visited a facility that surface coats air bag covers, but was not listed in the EPA database. Please provide the address and telephone number for the facility.
2. In item 3 of your response, it was delineated clearly which constituents were replaced or decreased in quantity with the combined coating sprayed on 2,940 parts/day at 55,275 gals/yr for 3,528,000 parts/yr for the original process; however, the proposed MACT dated January 8 stated that the combined coating sprayed in the original process was 44,213 gallons. Please explain why it was necessary to increase the combined coating sprayed in the original process from 44,213 to 55,275 gallons.
3. In item 3 of your response, the emission factors for the original process were listed as 7.02 lbs VOC/gallon and 6.72 lbs HAPs/gallon of combined coating. In like manner, the emission factors for the modified process were listed as 5.06 lbs VOC/gallon and

3.40 lbs HAPs/gallon of combined coating. Please explain how the emission factors were derived.

4. In item 4 of your response, the constituents of the original process in the first table are identical to the modified process in item 3 of your response. Moreover, the constituents of the original process in the second table in item 4 of your response are identical to the modified process in the first table in item 4 of your response. The constituents of the original process and modified process should be consistent. Please explain the discrepancies.
5. In item 4 of your response, the emission factors from the original process and the modified process were listed as 5.06 lbs VOC/gallon and 3.40 lbs HAPs/gallon of combined coating. Please explain how the emission factors were derived.
6. In item 5 of your response, a corrected figure 4 was enclosed. The total VOC emissions reported went from 5.37 lbs/gal to 4.68 lbs/gal. Please explain why the emission factors decreased. Is the topcoat added separately from the catalyst?
7. In item 6 of your response, various calculation methodologies were used. Please submit those calculations.

Note that all submittals must be signed and sealed by a professional engineer registered in the state of Florida.

If you have any questions, please contact Lennon Anderson at 561/681-6632. When referring to this project, please use the file number indicated.

Sincerely,



Lennon Anderson
Air Permitting Engineer

cc: William Kinell, HH Management
Alan Zahm, P.E., CD
Cindy Phillips, P.E., DARM