

## STATEMENT OF BASIS

Title V Air Operation Permit Renewal  
Permit No. 0250407-020-AV

### APPLICANT

The applicant for this project is Derby Building Products, LLC. The applicant's responsible official and mailing address are: Mr. Mark Hodge, Senior Plant Engineer, Derby Building Products, LLC, 1111 NW 165 Street, Miami, Florida 33169.

### FACILITY DESCRIPTION

The applicant operates the existing Derby Building Products, LLC, which is located in Miami-Dade County at 1111 NW 165 Street, Miami, Florida.

The Derby Building Products, LLC facility operations consist of the manufacturing and coating of polypropylene siding used for architectural and construction applications. The plastic siding is manufactured, coated, and packaged at the facility for shipping offsite. The coating operations consist of two (2) spray painting coating lines, and one (1) paint kitchen. Line No. 1 coats plastic shingles molded from polypropylene pellets, and consists of three (3) coating paint spray booths (one of which being state-of-the art), and a gas-fired curing oven. The coatings used are solvent-based and water-based color coatings. Line No. 2 consists of three (3) continuous spray booths, two (2) touch-up spray booths, and an electric convection-curing oven. Line No. 2 also coats plastic shingles molded from polypropylene pellets. Both paint lines are connected to an air pollution control system consisting of a Durr manufactured Regenerative Thermal Oxidizer (RTO), Model No. Ecopure RL60.

This facility also includes miscellaneous insignificant emissions units and/or activities.

### REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	Coating Line No. 1 consists of three (3) spray booths, and a gas-fired curing oven.  Coating Line No. 2 consists of three (3) continuous paint spray booths, two (2) touch-up spray booths, and an electric curing oven.  One (1) Paint Kitchen  <i>Captured VOC/HAP emissions from this emissions unit are routed to a single vessel RTO.</i>

### APPLICABLE REGULATIONS

Based on the Title V air operation permit renewal application received on September 13, 2018, this facility is a major source of hazardous air pollutants (HAP). The existing facility is not a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
40 CFR 63, Subpart P – NESHAP for Surface Coating of Plastic Parts and Products	001
40 CFR 63, Subpart A, NESHAP General Provisions	001
State Rule Citations – 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297	001
Local Rule – Chapter 24 – Code of Miami-Dade County	001

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### PROJECT DESCRIPTION

The purpose of this permitting project is to renew Title V permit for the above referenced facility.

### PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received September 13, 2018.

### PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 3089 – Plastic Products, Not Elsewhere Classified.

North American Industry Classification System (NAICS): 326199 – All Other Plastic Product Manufacturing.

HAP: The facility is identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility does not operate units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to this emissions unit, and requires that the RTO operate above 1,500°F as a set point temperature, and a minimum airflow that allows the facility to increase airflow and vacuum at the RTO inlet since capture increases with airflow rates.

GHG: The facility is not identified as a major source of green house gas (GHG) pollutants.

### PROJECT REVIEW

The following changes were made to the Title V permit during this renewal project:

1. The permit was put into the most recent format.
2. Hyperlinks have been inserted into the permit and appendix documents to aid in navigation throughout the document.
3. Specific Condition A.48.a), b) & c) has been revised to clarify what recordkeeping is required.
4. Minor corrections to typographical errors, and rule citations, etc.

### CONCLUSION

This project renews Title V air operation permit No. 0250407-014-AV, which was effective on May 1, 2014. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.