

STATEMENT OF BASIS

Title V Air Operation Permit Renewal and Revision
Permit No. 0690008-008-AV

APPLICANT

The applicant for this project is Wolverine Advanced Materials. The applicant's responsible official and mailing address are:

Mr. Terry Ray, Plant Manager
Wolverine Advanced Materials
10825 County Road 44
Lisbon, Florida 34788.

FACILITY DESCRIPTION

The applicant operates Wolverine Advanced Materials, which is located at 10825 County Road 44 in Lisbon, Florida.

Wolverine Advanced Materials operates a manufacturing facility that consists of a surface coating operation that includes a coil coater. The facility produces rubber-coated sealing materials utilized in the automotive industry. The coil coating line includes a permanent total enclosure to ensure 100 percent of the volatile organic compound (VOC) emissions are captured and conveyed to a single regenerative thermal oxidizer with a destruction efficiency of approximately 98.8 percent. **The facility has permanently shut down and removed the Hylene Drying and Hylene Dip Coating Lines, emissions unit (EU) 002 and 003, respectively.**

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

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

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Permit issued July 15, 1997
Title V Permit Renewal issued March 13, 2003
Air Construction Permit issued May 10, 2004
Title V Operating Permit Revision issued September 19, 2005
Title V Operating Permit Renewal issued November 21, 2007
Concurrent Processing Construction Permit and Title V Operation Renewal and Revision Application received December 02, 2011
Additional Information Request dated January 26, 2012
Additional Information Response received January 31, 2012
Notice of Intent to Issue Air Permit issued April 26, 2012
Public Notice Published May 22, 2012

PRIMARY REGULATORY REQUIREMENTS

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

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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: Emergency Fire Pump is subject to 40 CFR 60, Subpart A and 40 CFR 60, Subpart IIII.

NESHAP: The Coil Coater (EU 001) is subject to 40 CFR 63, Subpart A and 40 CFR 63, Subpart SSSS-Surface Coating of Metal Coil, beginning June 10, 2005. Record keeping is the compliance method. EU 001 **is not subject** to 40 CFR 60 Subpart TT, Standards of Performance for Metal Coil Surface Coating, since the unit was constructed prior to January 05, 1981. The Emergency Fire Pump (EU 006) is subject to 40 CFR 63, Subpart A and 40 CFR 63, Subpart ZZZZ.

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) does not apply to any of the units at the facility.

PROJECT REVIEW

The following changes were made as part of this renewal and revision:

1) EU 002 and 003 were permanently shut down and removed from the facility in February 2010; these emissions units were removed from the permit (**Section III. Subsection A. and B.**) and all their associated conditions. The following activities were also deleted from Appendix I-List of Insignificant Emissions Units and/or Activities:

2. Blast cleaning
7. Boxes of SHIMS
10. Laboratory Fume Hood

2) The following Specific Conditions were reformatted to fit new permitting template and changed:

A1. Permitted Capacity. The maximum permitted utilization rates are ~~2880~~ 4600 tons of coating, ~~199~~ 318 tons of primer, ~~233~~ 372 tons of sulfur solution, and ~~54~~ 86 tons of accelerator per any consecutive 12-month period.

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.; and Permit No. 0690008-009-AC]

3) **Emission Unit 006-Emergency Fire Pump** was added as part of this renewal and revision due to the applicability of the Federal Regulation 40 CFR 60, Subpart IIII and 40 CFR 63, Subpart ZZZZ.

CONCLUSION

This project renews and revises Title V air operation permit No. 0690008-007-AV, which was issued on November 21, 2007. This Title V air operation permit renewal and revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.