# STATEMENT OF BASIS

Industrial Container Services-FL, LLC
Drum Reconditioning Facility
**Facility ID No.:** 0950055
Orange County

Title V Air Operation Permit Renewal
**FINAL Permit Number 0950055-006-AV**
Renewal of Title V Air Permit Number 0950055-005-AV

The initial title V Air Operation Permit, 0950055-003-AV, was issued on November 12, 1998. Permit 0950055-004-AV renewed the initial permit, but was revised by permit 0950055-005-AV to incorporate 40 CFR 63 Subpart MMMM, National Emission Standards for Miscellaneous Metal Parts and Product Surface Coating. The subject of Permit 0950055-006-AV is the renewal of Title V air operation Permit 0950055-004-AV as revised by Permit Number 0950055-005-AV. Permit 0950055-006-AV also revises maximum usage capacities in emission units 011 and 012 to reduce the potential to emit volatile organic compounds (VOC).

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.

This facility includes the following emission units.
**Emission Unit 001:** Drum Reclamation Furnace vented to the thermal oxidizer to burn off residues and coatings on drums.
**Emission Unit 003:** Shot Blasting System for closed head drums equipped with a Wheelabrator Model 126-D Tube Dust Collector that provides a particulate reduction efficiency of approximately 80%.
**Emission Unit 005:** Three Shot Blasting Operations, two of which are for open head drums and one is for drum lids. All three are equipped with a single Pangborn bag house, Model 264-CT-614 which provides a particulate reduction efficiency of approximately 99%.
**Emission Unit 006:** One Steam Boiler, 200 hp Cleaver Brooks, Model CB552-200 (7.9 MMBTU/hr).
**Emission Unit 010:** Drum Derusting Process which utilizes muriatic acid (HCL) and whose emissions are controlled by a Plastichem, Model PT 500 single pack wet scrubber which provides an HCL reduction efficiency of approximately 95 %.
**Emission Unit 011:** Drum Preparation Process that includes drum label removal, drum deheading, dedenting, and debunging.
**Emission Unit 012:** Facility-Wide Fugitive Emissions.
**Emission Unit 013:** Surface Coating and Bake Ovens as follows:

1. A paint spray line for tight head drums including paint spray booth A1 and paint bake oven B1.
2. A paint spray line for open head drums including paint spray booths A2 and A3 and paint bake ovens B2 and B4.
3. A paint spray line for lids including paint spray booths A4 and A5 and paint bake oven B3 and paint air drying oven D4
4. Each paint spray booth is equipped with dry filters except booth A1, which is equipped with a Binks water wash filter.
5. VOC and HAP emissions from the ovens are controlled by a Balboa Pacific Co., Model DSF-003 thermal oxidizer that supplies waste heat to a waste heat boiler (350hp Dixon, s/n 2281). The thermal oxidizer is equipped with four North American Manufacturing Company, Model 4425-8-A burners. The thermal

oxidizer operates at a minimum of 1500 degrees F and provides a minimum VOC and HAP reduction efficiency of 94% of the VOC and HAP delivered to the thermal oxidizer inlet. Approximately 70% of the VOC and HAP emissions are routed through the ovens to the thermal oxidizer and approximately 30% are routed through individual paint booth stacks.

The applicable emission limitations are as follows:

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| Emission Unit 001: | BACT for sulfur content in fuel oil per Rule 62-296.406(2)&(3), F.A.C.;<br>small boiler VE limit per Rule 62-296.406(1), F.A.C.;<br>incinerator VE limit per Rule 62-296.401(1)(a), F.A.C. |
| Emission Unit 013: | General VE limit per Rule 62-296.320(4)(b)1., F.A.C.;<br>general VOC standard per Rule 62-296.320(1)(a), F.A.C.;<br>annual VOC limit per construction permit AC48-271214;<br>RACT limits per Rule 62-296.513(2)&(3), F.A.C.;<br>HAP limits per 40 CFR Part 63 Subpart A and Subpart MMMM |
| Emission Units 011, 012: | general VOC standard per Rule 62-296.320(1)(a), F.A.C. |
| Emission Units 010, 003, 005: | general VE limit per Rule 62-296.320(4)(b)1., F.A.C. |

The thermal oxidizer at the facility is subject to compliance assurance monitoring (CAM) under 40 CFR Part 64.

Also included in this permit are miscellaneous insignificant emission units and activities.

Based on the renewal Title V permit application received May, 2007 this facility is a major source of hazardous air pollutants (HAPs).

The following summary lists changes made to permit 0950055-005-AV.

1. The permitting authority was changed to Orange County Environmental Protection Division (EPD) from the Florida Department of Environmental Protection Central District in Section II condition 9 and on the title Page.
2. The phrase “Not Federally Enforceable” was added to Section II conditions 2 and 6.
3. A sentence was added to condition A.13 that records were to be completed by the end of the month following the month reported.
4. The conditions regarding compliance test reporting within 45 days were moved from emission unit Section III Subsections A, B and C, Recordkeeping, to facility wide Section II condition 12. Similarly, conditions requiring the Annual Operating Report and a renewal application were moved from emission unit Section III Subsections A, B and C, Recordkeeping, to facility wide Section II. This change moved conditions A.14, A.15, A.16, B.22, B.23, B.24, C.13, C.14 and C.15 of permit 0950055-005-AV and consolidated them into facility-wide conditions 12, 13 and 14 of this permit.
5. In Section I, Subsection B, it was noted that the facility chose to demonstrate compliance with Subpart MMMM using the 12-month emission rate without control device option.
6. A new condition B.19 was added requiring organic HAP emissions to meet the Subpart MMMM limit of 2.6 lb organic HAP/gal coating solids for each consecutive 12-month period. Condition B.20 was modified to add these HAP emissions to the recordkeeping log.