ORANGE COUNTY GOVERNMENT
FLORIDA

ENVIRONMENTAL PROTECTION DIVISION
Lori Cunniff, Manager
800 Mercy Drive, Suite 4
Orlando, Florida 32808-7896
407-836-1400 ▪ Fax 407-836-1499
www.ocepd.org

July 21, 2008

NOTICE OF FINAL PERMIT

CERTIFIED MAIL: 7007 3020 0000 5141 3962

Mr. Michael Osborne
Facility Manager
Industrial Container Services LLC
6191 Jones Avenue
Zellwood, Florida 32798

Subject: **Title V Air Operation Permit Renewal**
FINAL Title V Air Operation Permit Number 0950055-006-AV
Drum Reconditioning Facility

Dear Mr. Osborne:

Enclosed is FINAL Permit Number 0950055-006-AV for operating the Drum Reconditioning Facility located at 6191 Jones Avenue, Zellwood, Orange County, Florida, issued pursuant to Section 403, Florida Statutes (F.S.).

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Orlando, Florida.

ORANGE COUNTY
ENVIRONMENTAL PROTECTION DIVISION

Jodi D. Dittell

Mrs. Jodi D. Dittell
Environmental Program Supervisor
Air Quality Management

JAK
(2)JK/JD/HP:bh

Enclosures

CERTIFICATE OF SERVICE

The undersigned duly designated agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL Permit) and all copies were sent by certified mail or electronically (with Read Receipt) before the close of business on July 21, 2008 to the persons listed:

Mr. Michael Osborne, Facility Manager, Industrial Container Services LLC
Ms. Kay Rykowski, Vice President of Engineering, Industrial Container Services LLC
Mr. Dean H. Myers, P.E., General Environmental Engineering
Ms. Barbara Friday, FDEP BAR (Barbara.Friday@dep.state.fl.us) (for posting with Region 4, USEPA)

In addition, the undersigned duly designated agency clerk hereby certifies that copies of this NOTICE OF FINAL PERMIT (including the FINAL Permit) were sent by certified mail or electronically (with Read Receipt) on the same date to the persons listed:

Mr. James Bradner, P.E., FDEP Central District, Air Program Manager
Mr. Alan Zahm, P.E., FDEP Central District, Air Permitting Supervisor

FILED, on this date, pursuant to Section 120.52, F. S., with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk — Date: July 21, 2008

FINAL DETERMINATION

July 21, 2008

Title V Air Operation Permit
FINAL Permit Number 0950055-006-AV
Industrial Container Services LLC
Drum Reconditioning Facility

I. Comments

No comments were received from the U.S. EPA during the 45-day review period of the PROPOSED Permit. No changes were made to the PROPOSED permit.

II. Conclusion

The permitting authority, the Orange County Environmental Protection Division, hereby issues the FINAL Permit.

Industrial Container Services-FL, LLC
Drum Reconditioning Facility
Facility ID Number 0950055
Orange County

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

Permitting and Compliance Authority:
Orange County Environmental Protection Division
Air Quality Management
800 Mercy Drive, Suite 4
Orlando, Florida 32808
Telephone: 407-836-1400
Fax: 407-896-1499

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

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ENVIRONMENTAL PROTECTION DIVISION
Lori Cunniff, Manager
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July 21, 2008

Permittee:
Industrial Container Services-FL, LLC
6191 Jones Avenue
Zellwood, Florida 32798
Atten: Mr. Michael Osborne, Facility Manager

FINAL Permit No.: 0950055-006-AV
Facility ID Number: 0950055
SIC Number: 76
Project: Title V Air Operation Permit Renewal

This permit is for the operation of the Drum Reconditioning Facility. This facility is located at 6191 Jones Avenue, Zellwood, Orange County; UTM Coordinates: Zone 17, 439.8 km East and 3178.1 km North; Latitude: 28° 43' 55" North and Longitude: 81° 36' 45" 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 A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix CAM
Appendix H-1, Permit History/ID Number Changes
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix TV-6, TITLE V CONDITIONS (version dated 6/23/06)
Appendix SS-1, STACK SAMPLING FACILITIES (version dated 10/7/96)
Table 297.310-1, CALIBRATION SCHEDULE (version dated 10/7/96)
Appendix General Provisions
Appendix Subpart MMMM

Effective Date: July 21, 2008
Renewal Application Due Date: May 30, 2012
Expiration Date: November 30, 2012

ORANGE COUNTY
ENVIRONMENTAL PROTECTION DIVISION

John M. Kasper

John M. Kasper, P.E.
Engineer III
Air Quality Management

(2)DL/JK/JD/HP:bh

Section I. Facility Information.

Subsection A. Facility Description.

This facility reconditions used drums. Used drums are processed to remove paint, rust and residues. The drums are then painted and shipped off-site.

Drums are processed in a drum reconditioning furnace. The drums are straightened and then cleaned in a shot blasting operation to prepare the drums for painting. Painting is done in spray booths, and the paint is dried in drying ovens. Rusty drums are cleaned with muriatic acid. The facility has a steam boiler for process steam. Miscellaneous surface coating operations produce facility-wide fugitives.

PM emissions from the shot blasting operations are controlled with a bag house and a dust collector. The HCl emissions from the de-rusting operation are controlled with a wet scrubber. A thermal oxidizer is used to control emissions from the drum furnace and the drying ovens. A waste heat boiler captures heat from the thermal oxidizer. VOC and HAP emissions from the paint booths are vented to the atmosphere. Paint booth PM emissions are controlled with dry filters or water wash filters.

Primary pollutants are Volatile Organic Compounds (VOC), and Hazardous Air Pollutants (HAP). Based on the Title V permit renewal application dated May, 2007 this facility is a major source of HAP.

Subsection B. Summary of Emissions Unit ID Numbers and Brief Descriptions.

This facility includes the following emission units, and miscellaneous insignificant emission units and activities.

Emission Unit 001: Drum Reclamation Furnace
Emission Unit (EU) 001 is a furnace that subjects drums and lids to a temperature sufficient to dry and loosen exterior and interior paint as well as drum residue for ease of removal. The furnace is vented to the thermal oxidizer.

Emission Unit 003: Shot Blasting System
EU 003 is a shot blasting system for closed head drums equipped with a Wheelabrator Corp., Model 126-D Dust Tube Dust Collector that provides a particulate reduction efficiency of approximately 80%.

Emission Unit 005: Three Shot Blasting Operations
EU 005 consists of two shot blasting operations for open head drums and one for drum lids. All three are controlled by a single Pangborn bag house, Model 264-CT-614 that provides a particulate reduction efficiency of approximately 99%.

Emission Unit 006: One Steam Boiler
EU 006 is a 200 hp Cleaver Brooks boiler, Model CB552-200 rated at 7.9 MMBTU/hr.

Emission Unit 010: Drum Derusting Process
EU 010 is a drum derusting process that uses muriatic acid (HCL). Emissions are controlled by a Plastichem, Model PT 500 single pack wet scrubber that provides an HCL reduction efficiency of approximately 95 %.

Emission Unit 011: Drum Preparation Process
EU 011 is a drum preparation process that includes drum label removal, drum deheading, dedenting, and debunging.

Emission Unit 012: Facility-Wide Fugitive Emissions.
EU 012 consists of a number of coating and related processes that produce fugitive VOC and HAP emissions. This emission unit is classified as unregulated.

Emission Unit 013: Surface Coating and Bake Ovens

EU 013 consists of surface coating and bake ovens vented to the thermal oxidizer and described 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 Company Model DSF-003 thermal oxidizer which supplies waste heat to a waste heat boiler (350hp Dixon, serial number 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.

This facility is subject to 40 CFR Part 63 Subpart MMMM, National Emission Standards for Miscellaneous Metal Parts and Product Surface Coating. The facility has chosen to demonstrate compliance using option (b) in 63.3891, 12-month emission rate without control device.

Insignificant emissions units and activities are listed in Appendix I-1.

Please reference the permit number, facility ID number, and appropriate EU numbers on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, but are 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 Changes

These documents are on file with permitting authority:
Initial Title V Permit Application received June 17, 1996.
Initial Title V Permit issued November 12, 1998.
Renewal Title V Permit Application received June 5, 2002.
Renewal Title V Permit Application dated May, 2007.

Please reference the permit number, facility ID number, and appropriate EU numbers on all correspondence, test report submittals, applications, etc.

Subsection D. Miscellaneous.

The use of 'Permitting Notes' throughout this permit is for informational purposes only and these notes are not permit conditions.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall 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% opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of Clean Air Act).
a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 3346
Merrifield, VA 22116-3346
Telephone: 703/816-4434

b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and 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 Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by EPD.
[Rule 62-296.320(1)(a), F.A.C.]

7. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

8. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to EPD and EPA within 60 days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]
{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. and 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS.)}

9. The permittee shall submit all compliance-related notifications and reports required of this permit to EPD.

10. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Operating Permits Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9099
Fax: 404/562-9095

11. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

12. A copy of required compliance test reports shall be filed with EPD as soon as practical but no later than 45 days after the last test is completed.
[Rules 62-297.310(8), F.A.C.]

13. An FDEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year on or before March 1 of the following year and submitted to EPD.
[Rule 62-210.370(3), F.A.C.]

14. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to EPD four copies of an air permit application, DEP Form No. 62-210.900(1).
[Rule 62-4.090(1), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

EU ID Number and Brief Description
EU 006, Steam Boiler, 200 hp Cleaver Brooks, Model CB552-200 (7.9 MMBTU/hr)

The following conditions apply to EU 006.

Essential Potential to Emit (PTE) Parameters

A1. Capacity. The maximum annual heat input rate is 20,145 MMBTU per consecutive 12 months.
[Rule 62-210.200, (PTE), F.A.C., operating permit AO48-215697, and Title V application dated May, 2007]

A2. Methods of Operation. The unit is allowed to fire natural gas, propane, or new Number 2 fuel oil only.
[Rule 62.210.200, (PTE), F.A.C., operating permit AO48-215697, and Title V dated May, 2007]

A3. Hours of Operation. The unit is allowed to operate a maximum of 2550 hours per consecutive 12 months.
[Rule 62-210.200, (PTE), F.A.C., operating permit AO48-215697, and Title V application dated May, 2007]

A4. Emissions Unit Operating Rate Limitation After Testing. See specific condition number A10.
[Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

A5. BACT Determined by FDEP:
The amount of particulate and sulfur dioxide emissions will be limited by the firing of natural gas, propane, or new Number 2 distillate oil having a sulfur content of not more than 0.5%, by weight. The term "new" means an oil which has been refined from crude oil and has not been used.
[Rule 62-296.406(2)&(3), F.A.C. and operating permit AO48-215697]

A6. Visible emissions shall not exceed 20% opacity except for one two-minute period per hour during which opacity shall not exceed 40%.
[Rule 62-296.406(1), F.A.C.]

Compliance Test Methods and Procedures

A7. The unit shall demonstrate compliance with its visible emission limit in accordance with EPA Method 9 prior to permit expiration date. The test period shall be a minimum of 60 minutes.
[Rules 62-297.401, 62-297.310(4)(a)2., and 62-297.310(7)(a)4.a., F.A.C.]

A8. The provisions of EPA Method 9 (40 CFR Part 60, Appendix A) are adopted by reference with the following exceptions:

a. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential 15-second intervals during the required period of observation.
b. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g. 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g. 20 percent

opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

1. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
2. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.
[Rule 62-297.401, F.A.C.]

A9. At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test EPD. The notification must include the following information: the date, time and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test.
[Rule 62-297.310(7)(a)9, F.A.C.]

A10. Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2)& (2) (b), F.A.C.]

A11. Compliance with the fuel oil sulfur content limit shall be demonstrated by fuel analysis using ASTM D 129-91 for sulfur content of liquid fuels. Alternately, a certified sulfur analysis from the applicant's oil supplier may be used.
[Rule 62-297.440(1)(h), F.A.C.]

Monitoring of Operations

A12. Determination of Process Variables.

a. Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
b. Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5), F.A.C.]

Recordkeeping and Reporting Requirements

A13. In order to demonstrate compliance with conditions numbers A1, A2, A3, and A5, the permittee shall maintain a monthly log at the facility. The log shall be completed by the end of the month following the month reported, and shall be retained on file at the facility for at least 5 years from the date the data is recorded. The log at a minimum shall contain the following:

a. The month and year the data was recorded;
b. The monthly and consecutive 12-month totals of heat input rate, fuel type, and hours of operation;
c. The fuel oil sulfur content.

[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

Subsection B. This section addresses the following emissions unit.

EU ID Number and Brief Description

EU 013, Surface Coating and Bake Ovens vented to the thermal oxidizer and described 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/HAP emissions from the ovens are controlled by a Balboa Pacific Company Model DSF-003 thermal oxidizer which supplies waste heat to a waste heat boiler (350hp Dixon, serial number 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 following conditions apply to EU 013.

Essential Potential to Emit (PTE) Parameters

B1. Capacity. The total maximum utilization rate of coatings and solvents shall not exceed the following:

Material	Gallons per Consecutive 12 Months
Coatings	156,600
Solvents	6,000

[Rule 62-210.200, (PTE), F.A.C., and Title V application dated May, 2007]

B2. Fuels. The thermal oxidizer shall be fired with natural gas or liquified petroleum gas (LPG or propane) not to exceed a maximum heat input rate of 32,947 MMBTU per consecutive twelve months.
[Rule 62-210.200, (PTE), F.A.C., and Title V application dated May, 2007]

B3. Methods of Operation. The minimum VOC and HAP destruction efficiency of the thermal oxidizer shall be at least 90% across the unit.
[Rule 62-210.200, (PTE), F.A.C. and Title V application dated May, 2007]

B4. Hours of Operation. The hours of operation are not limited.
[Rule 62-210.200, (PTE), F.A.C. and Title V application dated May, 2007]

B5. Emissions Unit Operating Rate Limitation After Testing. See specific condition number B14.
[Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

B6. See facility-wide condition number 3 on page 4 for the visible emission limitation.

B7. The VOC emissions are limited to less than 95.0 tons per consecutive twelve months.
[Construction permit AC48-271214 and Title V application dated May, 2007]

B8. No owner or operator of a coating line for miscellaneous metal parts and products shall cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of:

a. 4.3 pounds per gallon of coating (0.52 kilograms per liter), excluding water, delivered to a coating applicator that applies clear coatings; *
b. 3.5 pounds per gallon of coating (0.42 kilograms per liter), excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 194 degrees Fahrenheit (90 degrees Celsius);
c. 3.5 pounds per gallon of coating (0.42 kilograms per liter), excluding water, delivered to a coating applicator that applies extreme performance coatings; or,
d. 3.0 pounds per gallon of coating (0.36 kilograms per liter), excluding water, delivered to a coating applicator for all other coatings and coating application systems.

* Note: Per EPA's 9/3/80 memo signed by Tom Helms, other drum interior coatings are included even though they may not be true "clear coat".

If more than one emission limitation in Rule 62-296.513(2)(a), F.A.C., applies to a specific coating, then the least stringent emission limitation shall be applied.

All volatile organic compound emissions from solvent washings shall be considered in the emission limitations in Rule 62-296.513(2)(a), F.A.C., unless the solvent is directed into containers that prevent evaporation into the atmosphere.

Control Technology: The emission limits in Rule 62-296.513(2)(a), F.A.C., shall be achieved by:

a. The application of low solvent coating technology; or,
b. Incineration, provided that 90 percent of the volatile organic compounds (VOC measured as total combustible carbon) which enter the incinerator are oxidized to carbon dioxide and water.

[Rule 62-296.513(2)&(3), F.A.C.]

Test Methods and Procedures

B9. The thermal oxidizer exhaust stack must be compliance tested for visible emissions in accordance with DEP Method 9 prior to permit expiration date. The test shall be conducted for 30 minutes or the length of the batch/cycle. See condition B13.
[Rules 62-297.401(9)(c); 62-297.310(7)(a)4.a.; and 62-297.310(4)(a)2., F.A.C.]

B10. DEP Method. The provisions of EPA Method 9 (40CFR60, Appendix A) are adopted by reference with the following exceptions:

a. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential 15 second intervals during the required period of observation.
b. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g. 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g. 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
    1. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
    2. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest

whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.
[Rule 62-297.401(9)(c), F.A.C.]

B11. VOC emissions from the paint booths are determined by using the 30 percent of the EPA Method 24 value and are counted as VOC emissions.
[construction permit AC48-271214]

B12. The compliance test for the VOC removal efficiency comparison of the inlet and outlet concentrations of the thermal oxidizer shall be conducted prior to permit expiration date in accordance with EPA Method 25A for the outlet. The inlet VOC shall be determined by using the VOCs of the coating materials as measured by EPA Method 24, minus the VOC emissions from the paint booths. The Department may accept, in place of EPA Method 24, a certification by the coating manufacturer of the composition of the coating if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings."
[Rules 62-297.401(25)(a); 62-297.401(24); 62-296.500(2)(b)4.; and 62-297.310(7)(a)4.b., F.A.C; construction permit AC48-271214]

B13. At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the Orange County Environmental Protection Department. The notification must include the following information: the date, time and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test.
[Rule 62-297.310(7)(a)9, F.A.C.]

B14. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rules 62-297.310(2)& (2) (b), F.A.C.]

Monitoring of Operations

B15. Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5), F.A.C.]

Compliance Assurance Monitoring (CAM)

B16. The control device for this emission unit is subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emission limitation; however, it is an indication that special compliance testing [in accordance with Rule 62-297.310(7)(b), F.A.C.] may be required upon request by EPD.
[40 CFR 64; Rule 62-213.440(4)(b)4., F.A.C.]

40 CFR Part 63 Subpart MMMM

B.17. The emissions unit in this subsection is subject to the applicable requirements contained in 40 CFR 63, Subpart A, which is incorporated by reference and attached to this permit, Appendix General Provisions.

B.18. The facility is subject to the applicable requirements contained in 40 CFR 63, Subpart MMMM, National Emission Standards for Miscellaneous Metal Parts and Product Surface Coating, which is incorporated by reference and attached to this permit. The company will maintain records to show compliance with Subpart MMMM. Rule 63.3891 allows three methods to comply:

a. Compliant material option
b. 12-month emission rate without control device
c. 12-month emission rate with control device

[40 CFR 63, Subpart MMMM, Section 63.3891]

B.19. The permittee must limit organic HAP emissions from general use coatings to no more than 2.6 pounds of organic HAP per gallon of coating solids used during each consecutive 12-month compliance period.
[40 CFR 63, Subpart MMMM, Section 63.3890(b)(1)]

Recordkeeping and Reporting Requirements

B20. In order to demonstrate compliance with conditions numbers B.1, B.2, B.7, B.8 and B.19, the permittee shall maintain both a monthly log and a daily log at the facility. The logs shall be retained on file at the facility for at least 5 years from the date the data is recorded.
The monthly log at a minimum shall contain the following:

a. The month and year the data was recorded;
b. The monthly and consecutive 12-month totals of material usage rate, fuel type and heat input rate, and VOC emission rate.
c. The consecutive 12-month total of organic HAP emission rate in terms of pounds of organic HAP per gallon of coating solids.

The daily log at a minimum shall contain the following:

d. The day, month and year the data was recorded;
e. The pounds of VOC per gallon of coating used excluding water.

[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

B21. An owner or operator of a stationary emissions unit using adhesives, coating, solvents, or graphic arts materials and subject to a specific emission limiting standard or other requirement of Rules 62-296.501 through 62-296.516, F.A.C., or Rule 62-296.570, F.A.C., shall maintain daily records of operations for the most recent two year period. The records shall be made available to the local, state, or federal air pollution agency upon request. The records shall include, but not be limited to, the following:

a. The rule number applicable to the operation for which the records are being maintained.
b. The application method and substrate type (metal, plastic, paper, etc.).
c. The amount and type of adhesive, coatings (including catalyst and reducer for multi-component coatings), solvent, and graphic arts material used at each point of application, including exempt compounds.
d. The VOC content as applied in each adhesive coating, solvent, and graphic arts material.
e. The date for each application of adhesive coating, solvent, and graphic arts material.
f. The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each.
g. Thermal oxidizer temperature.

[Rules 62-296.500.(2)(b)1. & 5.a., F.A.C.]

B22. Supporting documentation, such as Material Safety Data Sheets, purchase orders, etc., shall be kept which includes sufficient information to determine compliance. Documentation of each chemical reclaimed will use a mass balance method to determine usage and emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least 5 years and made available to EPD. Daily logs shall be completed within 7 business days and the monthly logs shall be completed by the end of the following month.
[Rules 62-4.070(3), and 62-213.440(1)(b)2.b., F.A.C.]

Subsection C. This section addresses the following emissions units.

EU ID Numbers and Brief Descriptions

EU 001, Drum Reclamation Furnace vented to the thermal oxidizer which subjects the drums and lids to a temperature sufficient to dry and loosen exterior and interior paint as well as drum residue for ease of removal.

EU 003, Shot Blasting System for closed head drums equipped with a Wheelabrator Corp., Model 126-D Dust Tube Dust Collector that provides a particulate reduction efficiency of approximately 80%.

EU 005, Three Shot Blasting Operations, two of which are for open head drums and one is for drum lids. All three are controlled by a single Pangborn bag house, Model 264-CT-614 that provides a particulate reduction efficiency of approximately 99%.

EU 010, Drum Derusting Process which utilizes muriatic acid (HCL) and whose emissions are controlled by a Plastichem, Model PT 500 single pack wet scrubber that provides an HCL reduction efficiency of approximately 95 %.

EU 011, Drum Preparation Process that includes drum label removal, drum deheading, dedenting, and debunging.

EU 012, Facility-Wide Fugitive Emissions, consists of a number of coating and related processes that produce fugitive VOC and HAP emissions. This emission unit is classified as unregulated.

The following conditions apply to the emissions units listed above.

Essential Potential to Emit (PTE) Parameters

C1. Permitted Capacity. The maximum consecutive 12-month capacities are as follows:

E.U.	Permitted Capacity
001	210,240 MMBTU heat input rate [permit 0950055-004-AV]
003 and 005	2,316,000 drums and covers total [operating permits AO48-239053 and AO48-215687]
011	7,500 gallons of organic solvents [Memorandum dated November 8, 2007]
010	13,056 pounds of muriatic acid (HCL) [construction permit AC48-203916]
012	220 gallons paint booth compound; 3,500 gallons contact adhesive; 10,400 gallons silicone wash material; 500 gallons seaming compound; 250 gallons seaming oil; 3,500 gallons aluminum paint [Memorandum dated November 8, 2007]

[Rules 62-210.200, (PTE), 62-4.070(3), 62-213.440, F.A.C. and Title V application dated May 2007]

C2. Methods of Operation. The drum reclamation furnace (EU 001) is subject to the following:

a. The furnace is allowed to fire only natural gas, liquified petroleum gas (LPG), distillate Number 2 fuel oil, or leftover virgin (unused) oil for energy recovery which consists of oil residues recovered during drum reclamation operations, such as lube oils, engine oils, industrial oils, and hydraulic oils, or any combination of the previously listed fuels. The burning of used oil is not authorized. The term “virgin” means an oil which has been refined from crude oil and has not been used. The thermal oxidizer is allowed to fire only liquefied petroleum gas (LPG) or natural gas.

b. The leftover virgin (unused) oil shall be sampled and analyzed twice annually during the months of May and November for the following constituents:

1. arsenic
2. cadmium
3. chromium
4. lead
5. flash point
6. total halogens
7. percent sulfur, by weight
8. PCBs

Sampling and analytical records and records of monthly oil usage rates shall be kept on-site.

c. Operation of this source must include the use of the following safeguards: The thermal oxidizer safeguard system consists of a temperature control loop calibrated and set at 1500 degrees F with a 15-minute start up purge timer to reach temperature. If the temperature in the thermal oxidizer drops below 1500 degrees F, a thermocouple located in the lower portion of the stack (immediately following the thermal oxidizer) senses the drop in temperature and engages the alarm contacts which will shut off: (1) combustion and atomizing air, (2) fuel supply, and (3) the drag chain conveyor to the furnace.
d. Drums that previously contained hazardous waste listed in 40CFR 261.3 are allowed to be reclaimed whenever those drums are empty as defined in 40 CFR 261.7.
e. No burning residues on or in drums leaving the furnace shall be allowed.
f. No PVC materials are to be burned.

[Rules 62.210.200, (PTE), and 62-4.070(3), F.A.C., operating permit 0950055-002-AO, and Title V application received June 17, 1996]

C3. Hours of Operation. The hours of operation are not limited.
[Rule 62-210.200, (PTE), F.A.C. and Title V application received 6/17/96]

C4. Emissions Unit Operating Rate Limitation After Testing. See specific condition number C9.
[Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

C5. See facility-wide condition number 3 on page 4 for the visible emission limitation for EU 001, EU 003, EU 005 and EU 010.

Test Methods and Procedures

C6. Emission units 001, 003, 005 and 010 shall demonstrate compliance with their respective visible emission limit in accordance with EPA Method 9 prior to permit expiration date. The test period shall be a minimum of 60 minutes for EU 001 and 30 minutes for the others.
[Rules 62-297.401, 62-297.310(4)(a)2., and 62-297.310(7)(a)4.a., F.A.C.]

C7. The provisions of EPA Method 9 (40 CFR Part 60, Appendix A) are adopted by reference with the following exceptions:

a. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
b. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g. 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g. 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

1. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
2. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.
[Rule 62-297.401, F.A.C.]

C8. At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the Orange County Environmental Protection Department. The notification must include the following information: the date, time and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test.
[Rule 62-297.310(7)(a)9, F.A.C.]

C9. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2)& (2) (b), F.A.C.]

Monitoring of Operations

C10. Determination of Process Variables.

a. Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
b. Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Recordkeeping and Reporting Requirements

C11. In order to demonstrate compliance with conditions numbers C1 and C2, the permittee shall maintain both a monthly log and a daily log at the facility. The logs shall be retained on file at the facility for at least 5 years from the date the data is recorded.
The monthly log at a minimum shall contain the following:

a. The month and year the data was recorded;
b. The consecutive 12-month totals of material usage rates, drum and cover production rates, and fuel firing rates and equivalent heat input rates.

The daily log at a minimum shall contain the following:

a. The day, month and year the data was recorded;
b. The thermal oxidizer temperatures.

[Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

C12. Supporting documentation, such as Material Safety Data Sheets, purchase orders, etc., shall be kept which includes sufficient information to determine compliance. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least 5 years and made available to the Department. Daily logs shall be completed within 7 business days and the monthly logs shall be completed by the end of the following month.
[Rules 62-4.070(3), and 62-213.440(1)(b)2.b., F.A.C.]

Compliance Assurance Monitoring (CAM)

C13. The control device for this emission unit is subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emission limitation; however, it is an indication that special compliance testing [in accordance with Rule 62-297.310(7)(b), F.A.C.] may be required upon request by EPD.
[40 CFR Part 64; Rule 62-213.440(4)(b)4., F.A.C.]