



# Florida Department of Environmental Protection

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

Mr. Malcolm Brant, President  
Windsor Metal Specialties, Inc.  
P.O. Box 421210  
Kissimmee, FL 32742-1210

Re: Permit No. 0970042-008-AV  
Windsor Metal Specialties, Inc.  
Title V Air Operation Permit Renewal

Dear Mr. Brant:

Enclosed is the draft/proposed permit package to renew the Title V air operation permit for Windsor Metal Specialties, Inc. This facility is located in Osceola County at 1820 Avenue A, Kissimmee, Florida. The permit package includes the following documents:

- The Statement of Basis, which summarizes the facility, the equipment, the primary rule applicability, and the changes since the last Title V renewal.
- The draft/proposed Title V air operation permit renewal, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permit provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the draft/proposed permit; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Air Permit must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication. Because this permit is being processed as a combined draft/proposed permit in order to reduce processing time, a duplicate copy of the proof of publication must also be transmitted by electronic mail within seven days of the date of publication to Ms. Ana Oquendo at EPA Region 4 at the following address: [oquendo.ana@epamail.epa.gov](mailto:oquendo.ana@epamail.epa.gov).

If you have any questions, please contact the Project Engineer, Ms. Natrevia Gradney, by telephone at (407)893-3334, ext. 2369 or by email at [Natrevia.Gradney@dep.state.fl.us](mailto:Natrevia.Gradney@dep.state.fl.us).

Sincerely,

Caroline D. Shine  
District Air Program Administrator  
Central District

5/12/11

Date

Enclosures  
CDS/jr/ta/ng

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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*In the Matter of an  
Application for Title V Air Operation Permit by:*

Windsor Metal Specialties, Inc.  
1820 Avenue A  
Kissimmee, FL 34758-2001  
*Responsible Official:*  
Mr. Malcolm Brant, President

Permit No. 0970042-008-AV  
Facility ID No. 0970042  
Windsor Metal Specialties, Inc.  
Title V Renewal  
Osceola County, Florida

**Facility Location:** Windsor Metal Specialties, Inc. operates the Windsor Metal Specialties, Inc., which is located in Osceola County at 1820 Avenue A, Kissimmee, Florida.

**Project:** The purpose of this project is to renew Title V air operation permit No. 0970042-007-AV, for the above referenced facility. Details of the project are provided in the application and the enclosed Statement of Basis.

**Permitting Authority:** Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Department of Environmental Protection's Air Resource Section in the Central District is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767. The Permitting Authority's mailing address is: 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767. The Permitting Authority's telephone number is 407/893-3334.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft permit, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft permit by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue a draft/proposed Title V air operation permit renewal to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments:** The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

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or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**EPA Review:** EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: [quendo.ana@epamail.epa.gov](mailto:quendo.ana@epamail.epa.gov). Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

**Objections:** Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

Executed in Orlando, Florida.

  
\_\_\_\_\_  
Caroline D. Shine  
District Air Program Administrator  
Central District

5/12/11  
\_\_\_\_\_  
Date

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Title V Air Operation Permit (including the Public Notice, the Statement of Basis, and the Draft/Proposed Permit), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on 5/12/11 to the persons listed below.

Mr. Malcolm Brant: [malcolm@windsorinc.net](mailto:malcolm@windsorinc.net)

Mr. Kevin Miller, P.E.: [kmiller@uscompliance.com](mailto:kmiller@uscompliance.com)

Ms. Katy Forney, U.S. EPA Region 4: [forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov)

Ms. Ana Oquendo, EPA Region 4: [oquendo.ana@epamail.epa.gov](mailto:oquendo.ana@epamail.epa.gov)

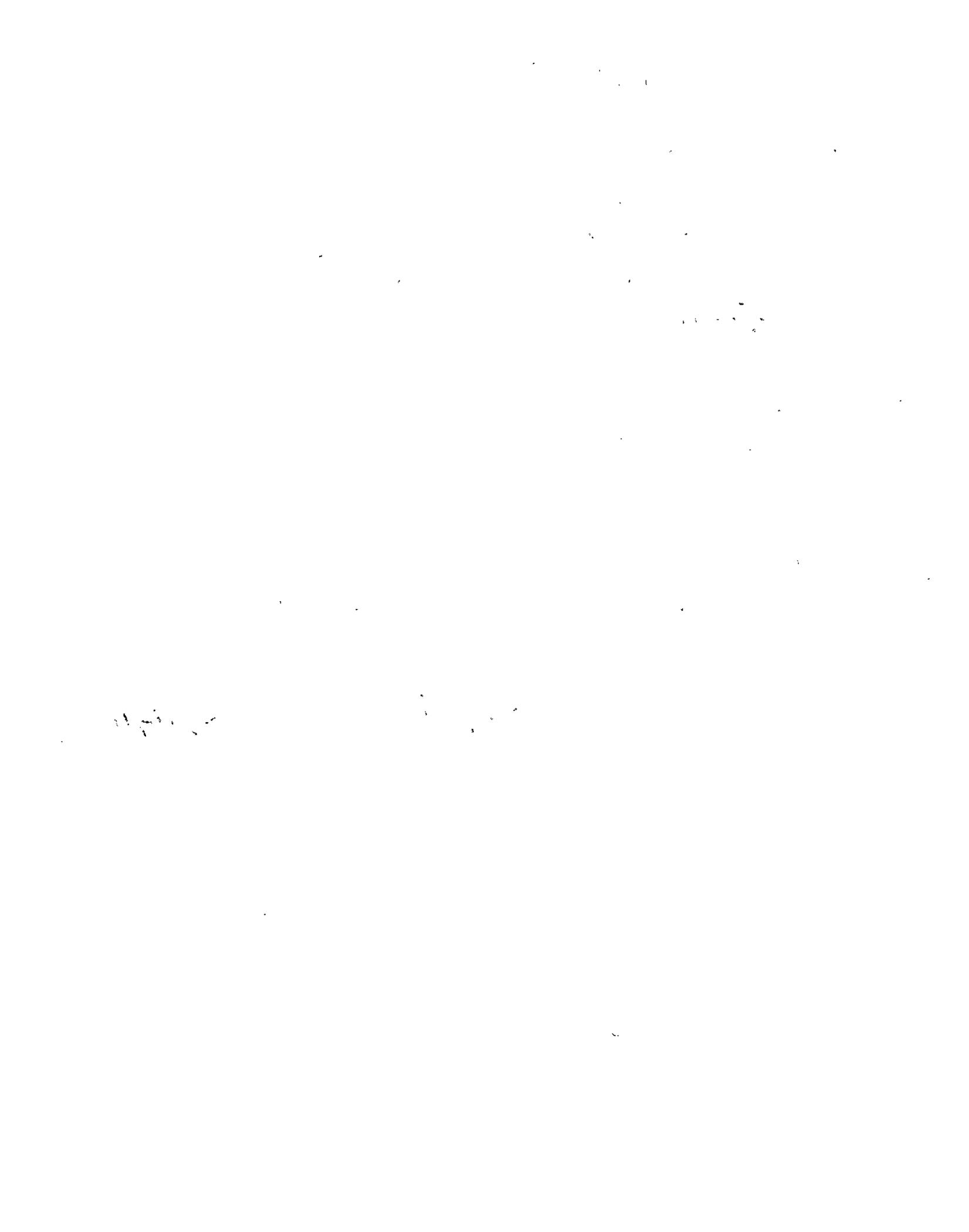
Ms. Barbara Friday, DEP BAR: [barbara.friday@dep.state.fl.us](mailto:barbara.friday@dep.state.fl.us) (for posting with U.S. EPA, Region 4)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
(Clerk)

5/12/11  
(Date)



## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

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Florida Department of Environmental Protection  
Central District  
Draft/Proposed Permit No. 0970042-008-AV  
Windsor Metal Specialties, Inc.  
Osceola County, Florida

**Applicant:** The applicant for this project is Windsor Metal Specialties, Inc.. The applicant's responsible official and mailing address are:

Mr. Malcolm Brant, President  
Windsor Metal Specialties, Inc.  
P.O. Box 421210  
Kissimmee, FL 32742-1210

**Facility Location:** The applicant operates the existing Windsor Metal Specialties, Inc., which is located in Osceola County at 1820 Avenue A, Kissimmee, Florida.

**Project:** The applicant applied on February 16, 2011 to the Department for a Title V air operation permit renewal. This is a renewal of Title V air operation permit No. 0970042-007-AV. The existing facility consists of surface coating operations including a power washer, drying oven, cure oven, thermal oxidizer, and six paint spray booths where primer, top, and/or clear coating materials are electrostatically applied to miscellaneous metal/aluminum parts.

**Permitting Authority:** Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Department of Environmental Protection's Air Resource Section in the Central District is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767. The Permitting Authority's mailing address is: 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767. The Permitting Authority's telephone number is 407/893-3334.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed permit, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft permit by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue a draft/proposed Title V air operation permit renewal to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

(Public Notice to be Published in the Newspaper)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

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**(Public Notice to be Published in the Newspaper)**

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

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28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.

**EPA Review:** EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: [oquendo.ana@epamail.epa.gov](mailto:oquendo.ana@epamail.epa.gov). Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

**Objections:** Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

(Public Notice to be Published in the Newspaper)





**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

Windsor Metal Specialties, Inc.  
P.O. Box 421210  
Kissimmee, FL 32742-1210

Facility ID No. 0970042

**PROJECT**

Project No. 0970042-008-AV  
Application for Title V Renewal  
Project Name: Title V Renewal

**COUNTY**

Osceola County, Florida

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Air Resource Management  
Central District Office  
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

May 09, 2011

Prepared by Natrevia Gradney

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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### GENERAL PROJECT INFORMATION

#### Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources – Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

#### Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Mr. Malcolm Brant, President  
Windsor Metal Specialties, Inc.  
P.O. Box 421210  
Kissimmee, FL 32742

B. Professional Engineer:

Mr. Kevin Miller, P.E.  
U.S. Compliance Corporation  
4350 Baker Road, Suite 100  
Minnetonka, MN 55343

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

### C. Project Location:

Windsor Metal Specialties, Inc.  
1820 Avenue A  
Kissimmee, FL 34758-2001

### D. Project Summary:

This project is to renew Title V air operation permit 0970042-007-AV, as further described in the permit.

### E. Application Information:

Application Received on: 02/16/11  
Additional Information Requested on: N/A  
Additional Information Received on: N/A  
Application Complete: 02/16/2011

## II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

<b>Subject to:</b>	<b>Y/N</b>	<b>Comments</b>
<b>Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.</b>	Y	Not exempt from general permitting requirements.
<b>Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration</b>	N	Facility is not a PSD major source.
<b>Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards</b>	Y	Painting operations are a source of unconfined particulate matter emissions.
<b>Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)</b>	Y	Painting operations are a source of VOC and odors.
<b>Rule 62-296.400, F.A.C. - Stationary Source Emission Standards</b>	N	There is no applicable source category.
<b>Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)</b>	N	Osceola County is an attainment area for ozone.
<b>Rule 62-296.700, F.A.C. - Reasonably</b>	N	There is no applicable source

**TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

<b>Subject to:</b>	<b>Y/N</b>	<b>Comments</b>
Available Control Technology (PM)		category.
<b>Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)</b>	N	There is no applicable source category.
<b>Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS - 40 CFR 61)</b>	N	There is no applicable source category.
<b>Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS - 40 CFR 63)</b>	Y	EU No. 001 is subject to 40 CFR 63, Subparts A and MMMM.
<b>Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution</b>	Y	Facility is a Title V source.
<b>Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.</b>	Y	VE testing is required for EU No. 001.

III. Summary of Emissions

<b>Pollutant</b>	<b>EU No. and Brief Description</b>	<b>Potential Emissions (tpy)</b>	<b>Allowable Emissions (tpy, opacity)</b>
PM	001- Surface Coating Operation	0.16	
	<b>Total</b>	<b>0.16</b>	
VOC	001-Surface Coating Operation PTE is based on permitted usage rate of 30,000 gallons of paints/solvent per consecutive 12 month period. Assume usage rates of 3,500 gallons/yr. of primer, 14,250/yr. gallons of assorted colors and clear coatings, 4,000 gallons /yr. of zylene, 4,000 gallons/yr. of MIBK, 250 gallons/yr. of butyl carbitol, and 4,000 gallons/yr. of MEK. Worst case assumption based on the material with the highest VOC content.	90.0	90.0
	<b>Total</b>	<b>90.0</b>	<b>90.0</b>
NOx	001- Surface Coating Operation	2.94	
	<b>Total</b>	<b>2.94</b>	
SO2	001- Surface Coating Operation	0.01	
	<b>Total</b>	<b>0.01</b>	

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Pollutant	EU No. and Brief Description	Potential Emissions (tpy)	Allowable Emissions (tpy, opacity)
CO	001- Surface Coating Operation	1.17	
	<b>Total</b>	<b>1.17</b>	
Total HAP	001- Surface Coating Operation PTE is based on permitted usage rate of 30,000 gallons of paints/solvent per consecutive 12 month period. Assume usage rates of 3,500 gallons/yr. of primer, 14,250/yr. gallons of assorted colors and clear coatings, 4,000 gallons /yr. of zylene, 4,000 gallons/yr. of MIBK, 250 gallons/yr. of butyl carbitol, and 4,000 gallons/yr. of MEK. It is conservatively assumed that HAP emissions are equal to VOC emissions. Worst case assumption based on the material with the highest VOC content.	90.0	90.0
	<b>Total</b>	<b>90.0</b>	<b>90.0</b>
VE	001- Surface Coating Operation		20%

#### IV. Federal NSPS and/or NESHAP Provisions

A. This facility is **subject** to 40 CFR 63, Subpart A, General Provisions and 40 CFR 63 Subpart MMMM- National Emission Standards of Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

#### V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

#### VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft

## **TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

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permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

## STATEMENT OF BASIS

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Title V Air Operation Permit Renewal  
Permit No. 0970042-008-AV

### APPLICANT

The applicant for this project is Windsor Metal Specialties, Inc. The applicant's responsible official and mailing address are:

Mr. Malcolm Brant, President  
Windsor Metal Specialties, Inc.  
P.O. Box 421210  
Kissimmee, FL 32742-1210

### FACILITY DESCRIPTION

The applicant operates the Windsor Metal Specialties, Inc., which is located at 1820 Avenue A, Kissimmee, Florida.

The facility contains a surface coating operation consisting of a power washer, drying oven, cure oven, thermal oxidizer, and six paint spray booths where primer, top and/or clear coating materials are electrostatically applied to miscellaneous metal/aluminum parts. The paint spray booths are equipped with dry filters that provide a particulate reduction efficiency of approximately 98 to 99 percent. Painted parts from the spray booths are routed to a cure oven for drying. The VOC exhaust from the cure oven is ducted to a thermal oxidizer that provides a VOC destruction efficiency of approximately 95 percent. Continuous compliance monitoring of the process is undertaken with a temperature recorder and the temperature used during the successful compliance test. The exhaust from the thermal oxidizer is ducted to the drying oven which is utilized to dry the washed parts prior to painting.

The facility includes miscellaneous fugitive emissions from the following activities: mixing, coatings with solvents and pigments, spray gun cleaning, solvent recovery and recycling, air drying of cleaned paint containers, and hand lay-up/air drying of touchup paint and finish coatings.

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 the existing Title V permit for the above referenced facility.

### PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit issued June 16, 1998  
Application for a Title V Air Operation Permit Renewal received March 30, 2001  
Title V Air Operation Permit Renewal issued September 24, 2001  
Application for a Title V Air Operation Permit Revision received July 13, 2005  
Title V Air Operation Permit Revision issued January 03, 2006  
Application for a Title V Air Operation Permit Renewal received June 29, 2006  
Title V Air Operation Permit Renewal issued February 08, 2007  
Application for a Title V Air Operation Permit Renewal received February 16, 2011

## STATEMENT OF BASIS

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### PRIMARY REGULATORY REQUIREMENTS

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

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

### PROJECT REVIEW

There are no changes since the last Title V Air Operation Permit Renewal.

### CONCLUSION

This project renews Title V air operation permit No. 0970042-007-AV, which was issued on February 08, 2007. 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.

## ***DRAFT/PROPOSED PERMIT***

**PERMITTEE:**

Windsor Metal Specialties, Inc.  
1820 Avenue A  
Kissimmee, Florida 34758-2001

Permit No. 0970042-008-AV  
Facility ID No. 0970042  
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Windsor Metal Specialties, Inc. is located in Osceola County at 1820 Avenue A, Kissimmee, Florida. UTM Coordinates are: Zone 17, 451.57 East and 3125.21 North. Latitude is: 28° 15' 6.8967" North; and, Longitude is: 81° 29' 37.3076" West.

The 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, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: TBD  
Renewal Application Due Date: TBD  
Expiration Date: TBD

*(Draft/Proposed)*

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Caroline D. Shine  
District Air Program Administrator  
Central District

CDS/jr/ng

**SECTION I. FACILITY INFORMATION.**

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**Subsection A. Facility Description.**

The facility contains a surface coating operation consisting of a power washer, drying oven, cure oven, thermal oxidizer, and six paint spray booths where primer, top and/or clear coating materials are electrostatically applied to miscellaneous metal/aluminum parts.

**Subsection B. Summary of Emissions Units.**

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Surface Coating Operation

**Subsection C. Applicable Regulations.**

Based on the Title V air operation permit renewal application received February 16, 2011, this facility is a major source of hazardous air pollutants (HAP).

A summary of applicable regulations is shown in the following table.

Regulation	EU No.
40 CFR 63, Subpart A, NESHAP General Provisions	001
40 CFR 63, Subpart Mmmm	001
62-296.320	001

# Windsor Metal Specialties, Inc.

Facility ID No. 0970042

Osceola County

## Title V Air Operation Permit Renewal

Permit No. 0970042-008-AV

(Renewal of Title V Air Operation Permit No. 0970042-007-AV)



### Permitting Authority:

State of Florida

Department of Environmental Protection  
Air Resource Management, Central District

3319 Maguire Blvd., Suite 232  
Orlando, Florida 32803-3767

Telephone: (407) 893-3334

Fax: (850) 412-0455

### Compliance Authority:

State of Florida

Department of Environmental Protection  
Air Resource Management, Central District

3319 Maguire Blvd., Suite 232  
Orlando, Florida 32803-3767

Telephone: (407) 893-3334

Fax: (850) 412-0455

## Title V Air Operation Permit Renewal

Permit No. 0970042-008-AV

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## SECTION II. FACILITY-WIDE CONDITIONS.

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The following conditions apply facility-wide to all emission units and activities:

**FW1. Appendices.** The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

### Emissions and Controls

**FW2. Not federally Enforceable. Objectionable Odor Prohibited.** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.  
[Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

**FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) 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 the Department. To comply, procedures to minimize pollutant emissions shall include the following:

- Tightly cover or close all VOC containers when they are not in use;
- Tightly cover, where possible, all open troughs, basins, baths, tanks, etc.;
- Maintain all piping, valves, fittings, etc. in good operating condition;
- Prevent excessive air turbulence across exposed VOC; and
- Immediately confine and clean up spills of VOC containing materials.

[Rule 62-296.320(1), F.A.C.]

**FW4. General Visible Emissions.** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.  
[Rule 62-296.320(4)(b)1, F.A.C.]

**FW5. Unconfined Particulate Matter.** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- Chemical or water application to unpaved roads and unpaved yard areas;
- Paving and maintenance of roads, parking areas, and yards;
- Landscaping or planting of vegetation; and
- Other techniques, as necessary.

[Rule 62-296.320(4)(c), F.A.C.]

### Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

## SECTION II. FACILITY-WIDE CONDITIONS.

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- FW6.** Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1<sup>st</sup> of each year.  
[Rule 62-210.370(3), F.A.C.]
- FW7.** Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1<sup>st</sup> of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site:  
<http://www.dep.state.fl.us/air/emission/tvfee.htm>.  
[Rule 62-213.205, F.A.C.]
- FW8.** Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.  
[Rules 62-213.440(3)(a)2., 3. and (3)(b), F.A.C.]
- FW9.** Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:
- a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:  

RMP Reporting Center  
Post Office Box 10162  
Fairfax, VA 22038  
Telephone: (703) 227-7650.
  - b. 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]

**SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.**

**Subsection A. Emissions Unit 001**

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
-001	The paint spray booths are equipped with dry filters that provide a particulate reduction efficiency of approximately 98 to 99 percent. Painted parts from the spray booths are routed to a cure oven for drying. The VOC exhaust from the cure oven is ducted to a thermal oxidizer that provides a VOC destruction efficiency of approximately 95 percent. Continuous compliance monitoring of the process is undertaken with a temperature recorder and the temperature used during the successful compliance test. The exhaust from the thermal oxidizer is ducted to the drying oven which is utilized to dry the washed parts prior to painting.

**Essential Potential to Emit (PTE) Parameters**

- A.1. Permitted Capacity. Volatile organic compound (VOC) usage at the facility shall not exceed 30,000 gallons of paints and solvents per any consecutive twelve month period.  
[Rules 62-4.160(2), 62-210.200(PTE), F.A.C.; and Permit No. 0970042-003-AC]
- A.2. Hours of Operation. This emissions unit may operate 3,165 hours/year.  
[Rule 62-210.200(PTE), F.A.C.; Permit No. 0970042-003-AC]
- A.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements.  
[Rule 62-297.310(2), F.A.C.]

**Emission Limitations and Standards**

- A.4. Visible Emissions. Visible emissions shall not exceed 20 percent opacity.  
[Rule 62-296.320(4)(b)1, F.A.C.]
- A.5. VOC Emissions. VOC emissions shall not exceed 90.0 tons per any consecutive twelve month period.  
[Rule 62-210.200(PTE), F.A.C.; Permit No. 0970042-003-AC]
- A.6. HAP Emissions. HAP emissions shall not exceed 90.0 tons per any consecutive twelve month period.  
[Rule 62-210.200(PTE), F.A.C.; Permit No. 0970042-003-AC]

**For an existing affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in paragraphs (b)(1) through (5) of this section, except as specified in paragraph (c) of this section, determined according to the requirements in §63.3941, §63.3951, or §63.3961.**

**(1) For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.**

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

(2) For each existing high performance coating affected source, limit organic HAP emissions to no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(3) For each existing magnet wire coating affected source, limit organic HAP emissions to no more than 0.12 kg (1.0 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(4) For each existing rubber-to-metal coating affected source, limit organic HAP emissions to no more than 4.5 kg (37.7 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(5) For each existing extreme performance fluoropolymer coating affected source, limit organic HAP emissions to no more than 1.5 kg (12.4 lbs) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

Note: A compliance period consists of 12 months. Each month is the end of a compliance period consisting of that month and the preceding 11 months. Windsor Metal Specialties has chosen the "Compliant Material Option" to demonstrate compliance with the 40 CFR 63, Subpart Mmmm. See Condition No. A.17.

[40 CFR63, §63.3890]

Test Methods and Procedures

A.7. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
EPA 1	Sample and Velocity Traverses for Stationary Sources
EPA 2	Determination of Stack Gas Velocity and Volumetric Flow Rate
DEP 9	Visual Determination of the Opacity of Emissions from Stationary Sources: The test shall be conducted for 30 minutes or the length of the batch/cycle.
EPA 25A	Determination of total Gaseous Organic Concentration Using a Flame Ionization Analyzer

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.

[Rules 62-297.310 and 62-297.401(9)(c), F.A.C.]

A.8. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

[Rule 62-297.310, F.A.C.]

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## SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

### Subsection A. Emissions Unit 001

**A.9. Compliance Tests Prior To Renewal.** Compliance tests shall be performed for visible emissions and to determine the destruction efficiency of the thermal oxidizer once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limit in Specific Condition A.4. and to demonstrate the destruction efficiency of the thermal oxidizer.

The destruction efficiency of the thermal oxidizer shall be demonstrated by determining the inlet and outlet VOC emissions. The testing shall consist of three (3) runs of one (1) hour duration each. The inlet VOC quantity and outlet VOC quantity shall be measured simultaneously. The following values shall be determined as specified:

- a. The inlet VOC quantity shall be determined by using EPA Method 25A, EPA Method 1, and EPA Method 2.
- b. The outlet VOC quantity shall be determined by using EPA Method 25A, EPA Method 1, and EPA Method 2.
- c. The destruction efficiency of the oxidizer shall be at least 90 percent.
- d. The oxidizer temperature shall be reported.
- e. Visible emissions opacity shall be determined by DEP Method 9.

[Rules 62-210.300(2)(a), 62-297.310(7)(a), and F.A.C.]

**A.10. Compliance Test Notification Requirement.** The permittee shall notify the Compliance Authority, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the permittee.

[Rule 62-297.310(7)(a)9, F.A.C.]

### **Monitoring Requirements**

**A.11. Thermal Oxidizer:** The thermal oxidizer shall be operated at a minimum temperature of 1400°F during operation of the curing oven. Record the temperature in the thermal oxidizer near the combustion chamber outlet on a continuous basis, in a manner and with instrumentation acceptable to the Department. A copy of the temperature chart shall be kept at the facility for at least 5 years from the date the temperature was recorded and made available to the Department. [Rule 62-4.070(3), F.A.C.]

### **Recordkeeping and Reporting Requirements**

**A.12 Compliance Test Reports Requirement.** Reports of the required test report shall be filed with the air compliance section of this office as soon as practical but no later than 45 days after the last test is completed.

[Rule 62-297.310(8), F.A.C.]

**A.13 Reporting Schedule.** The following reports and notifications shall be submitted to the Compliance Authority:

### SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

#### Subsection A. Emissions Unit 001

Report	Reporting Deadline	Related Condition
Semiannual Compliance Report	January 1- June 30 and July 1- December 31.	40 CFR63, §63.3920

[40 CFR63, §63.3920; Rule 62-213.440, F.A.C.]

**A.14** Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

**A.15.** Monthly Recordkeeping Requirements. In order to demonstrate compliance with specific conditions no. A.1., A.2., A.5., and A.6., the permittee shall maintain a **monthly** log at the facility. The log at a minimum shall contain the following:

- a. Facility Name, Facility ID No. (i.e., 0970042);
- b. Date (Month/Year of record);
- c. Consecutive 12 month total of material usage;
- d. Consecutive 12 month total of hours of operation;
- e. Consecutive 12 month total of VOC/HAP emissions; and
- f. Consecutive 12 month total of organic HAP content in coatings, thinners and/or other additives, and cleaning materials used.

Note: A consecutive 12 month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12 month total treats each month of the year as the end of a 12 month period. A 12 month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 month totals using whatever number of months of data are available until such a time as a consecutive 12 month total can be maintained each month.

Logs must document the method, calculations, and formulas used in determining the usage rate and the emission rate. This includes, but is not limited to, the product name, density, individual and total HAP contents, and individual and total VOC content. All calculations, including those used to derive emission credits for mass balance, must be clearly documented, and may be presented in the form of a template of sample calculations, which is filed with the logs required in this specific condition and available for review on site by regulatory inspectors. [Rules 62-4.070(3), and 62-213.440(1)(b)2., F.A.C.]

**A.16.** Supporting Documentation. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (the amount used minus the amount collected for disposal or recycle). Supporting documentation (chemical usage tracking logs, MSD sheets, emission factors, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) and including references to the VOC/HAP emission factors used, shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. Supporting documentation, such as Material Safety Data Sheets, purchase orders, etc., shall be kept which includes sufficient information to determine compliance. The log and documents shall be kept at the facility for at least 5 years and made available to the Department. **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.]

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## SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

### Subsection A. Emissions Unit 001

#### Other Requirements

**A.17. Federal Rule Requirements.** In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63, Subpart M – National Emission Standards of Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (**attached and part of this permit, See Section IV. Appendices**). In order to demonstrate continual compliance with this subpart, the facility has chosen to utilize the “Compliant Material Option”:

- a. *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. You must meet all the requirements of §§63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option.

Listed below are § 63.3920 through § 63.3952 of 40 CFR 63, Subpart M

#### **§ 63.3920 What reports must I submit?**

- (a) *Semiannual compliance reports.* You must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of this section.
  - (1) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
    - (i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.3940, §63.3950, or §63.3960 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.
    - (ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
    - (iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
    - (iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

## SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

### Subsection A. Emissions Unit 001

(2) *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(3) *General requirements.* The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (vii) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected source.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used.

(v) If you used the emission rate without add-on controls or the emission rate with add-on controls compliance option (§63.3891(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

(vi) If you used the predominant activity alternative (§63.3890(c)(1)), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report.

(vii) If you used the facility-specific emission limit alternative (§63.3890(c)(2)), include the calculation of the facility-specific emission limit for each 12-month compliance period during the 6-month reporting period.

(4) *No deviations.* If there were no deviations from the emission limitations in §§63.3890, 63.3892, and 63.3893 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If you used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

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- (5) *Deviations: Compliant material option.* If you used the compliant material option and there was a deviation from the applicable organic HAP content requirements in §63.3890, the semiannual compliance report must contain the information in paragraphs (a)(5)(i) through (iv) of this section.
- (i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.
  - (ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (*e.g.*, information provided by coating suppliers or manufacturers, or test reports).
  - (iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (*e.g.*, information provided by material suppliers or manufacturers, or test reports).
  - (iv) A statement of the cause of each deviation.
- (6) *Deviations: Emission rate without add-on controls option.* If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.3890, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.
- (i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890.
  - (ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). You do not need to submit background data supporting these calculations (*e.g.*, information provided by materials suppliers or manufacturers, or test reports).
  - (iii) A statement of the cause of each deviation.
- (7) *Deviations: Emission rate with add-on controls option.* If you used the emission rate with add-on controls option and there was a deviation from an emission limitation (including any periods when emissions bypassed the add-on control device and were diverted to the atmosphere), the semiannual compliance report must contain the information in paragraphs (a)(7)(i) through (xiv) of this section. This includes periods of startup, shutdown, and malfunction during which deviations occurred.
- (i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890.
  - (ii) The calculations used to determine the 12-month organic HAP emission rate for each compliance period in which a deviation occurred. You must provide the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1 and 1A through 1C of §63.3951; and, if applicable,

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the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; the calculation of the mass of organic HAP emission reduction each month by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of §63.3961, and Equations 2, 3, and 3A through 3C of §63.3961, as applicable; the calculation of the total mass of organic HAP emissions each month using Equation 4 of §63.3961; and the calculation of the 12-month organic HAP emission rate using Equation 5 of §63.3961. You do not need to submit the background data supporting these calculations (*e.g.*, information provided by materials suppliers or manufacturers, or test reports).

- (iii) The date and time that each malfunction started and stopped.
  - (iv) A brief description of the CPMS.
  - (v) The date of the latest CPMS certification or audit.
  - (vi) The date and time that each CPMS was inoperative, except for zero (low-level) and high-level checks.
  - (vii) The date, time, and duration that each CPMS was out-of-control, including the information in §63.8(c)(8).
  - (viii) The date and time period of each deviation from an operating limit in Table 1 to this subpart; date and time period of any bypass of the add-on control device; and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.
  - (ix) A summary of the total duration of each deviation from an operating limit in Table 1 to this subpart and each bypass of the add-on control device during the semiannual reporting period, and the total duration as a percent of the total source operating time during that semiannual reporting period.
  - (x) A breakdown of the total duration of the deviations from the operating limits in Table 1 of this subpart and bypasses of the add-on control device during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
  - (xi) A summary of the total duration of CPMS downtime during the semiannual reporting period and the total duration of CPMS downtime as a percent of the total source operating time during that semiannual reporting period.
  - (xii) A description of any changes in the CPMS, coating operation, emission capture system, or add-on control device since the last semiannual reporting period.
  - (xiii) For each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the actions you took to correct the deviation.
  - (xiv) A statement of the cause of each deviation.
- (b) *Performance test reports.* If you use the emission rate with add-on controls option, you must submit reports of performance test results for emission capture systems and add-on control devices no later than 60 days after completing the tests as specified in §63.10(d)(2).

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(c) *Startup, shutdown, malfunction reports.* If you used the emission rate with add-on controls option and you had a startup, shutdown, or malfunction during the semiannual reporting period, you must submit the reports specified in paragraphs (c)(1) and (2) of this section.

(1) If your actions were consistent with your startup, shutdown, and malfunction plan, you must include the information specified in §63.10(d) in the semiannual compliance report required by paragraph (a) of this section.

(2) If your actions were not consistent with your startup, shutdown, and malfunction plan, you must submit an immediate startup, shutdown, and malfunction report as described in paragraphs (c)(2)(i) and (ii) of this section.

(i) You must describe the actions taken during the event in a report delivered by facsimile, telephone, or other means to the Administrator within 2 working days after starting actions that are inconsistent with the plan.

(ii) You must submit a letter to the Administrator within 7 working days after the end of the event, unless you have made alternative arrangements with the Administrator as specified in §63.10(d)(5)(ii). The letter must contain the information specified in §63.10(d)(5)(ii).

#### § 63.3930 *What records must I keep?*

You must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. If you are using the predominant activity alternative under §63.3890(c), you must keep records of the data and calculations used to determine the predominant activity. If you are using the facility-specific emission limit alternative under §63.3890(c), you must keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. You must also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.

(1) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.

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- (2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941.
- (3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951.
- (4) For the emission rate with add-on controls option, records of the calculations specified in paragraphs (c)(4)(i) through (v) of this section.
- (i) The calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1 and 1A through 1C of §63.3951 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4);
- (ii) The calculation of the total volume of coating solids used each month using Equation 2 of §63.3951;
- (iii) The calculation of the mass of organic HAP emission reduction by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of §63.3961 and Equations 2, 3, and 3A through 3C of §63.3961, as applicable;
- (iv) The calculation of each month's organic HAP emission rate using Equation 4 of §63.3961; and
- (v) The calculation of each 12-month organic HAP emission rate using Equation 5 of §63.3961.
- (d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used.
- (e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.
- (f) A record of the volume fraction of coating solids for each coating used during each compliance period.
- (g) If you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
- (h) If you use an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), you must keep records of the information specified in paragraphs (h)(1) through (3) of this section.

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- (1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.
- (2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.3951.
- (3) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.
  - (i) [Reserved]
  - (j) You must keep records of the date, time, and duration of each deviation.
  - (k) If you use the emission rate with add-on controls option, you must keep the records specified in paragraphs (k)(1) through (8) of this section.
    - (1) For each deviation, a record of whether the deviation occurred during a period of startup, shutdown, or malfunction.
    - (2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
    - (3) The records required to show continuous compliance with each operating limit specified in Table 1 to this subpart that applies to you.
    - (4) For each capture system that is a PTE, the data and documentation you used to support a determination that the capture system meets the criteria in Method 204 of appendix M to 40 CFR part 51 for a PTE and has a capture efficiency of 100 percent, as specified in §63.3965(a).
    - (5) For each capture system that is not a PTE, the data and documentation you used to determine capture efficiency according to the requirements specified in §§63.3964 and 63.3965(b) through (e), including the records specified in paragraphs (k)(5)(i) through (iii) of this section that apply to you.
      - (i) *Records for a liquid-to-uncaptured gas protocol using a temporary total enclosure or building enclosure.* Records of the mass of total volatile hydrocarbon (TVH) as measured by Method 204A or 204F of appendix M to 40 CFR part 51 for each material used in the coating operation, and the total TVH for all materials used during each capture efficiency test run, including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the temporary total enclosure or building enclosure during each capture efficiency test run, as measured by Method 204D or 204E of appendix M to 40 CFR part 51, including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of appendix M to 40 CFR part 51 for either a temporary total enclosure or a building enclosure.
      - (ii) *Records for a gas-to-gas protocol using a temporary total enclosure or a building enclosure.* Records of the mass of TVH emissions captured by the emission capture system as measured by Method 204B or 204C of appendix M to 40 CFR part 51 at the inlet to the add-on control device,

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including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the temporary total enclosure or building enclosure during each capture efficiency test run as measured by Method 204D or 204E of appendix M to 40 CFR part 51, including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of appendix M to 40 CFR part 51 for either a temporary total enclosure or a building enclosure.

(iii) *Records for an alternative protocol.* Records needed to document a capture efficiency determination using an alternative method or protocol as specified in §63.3965(e), if applicable.

(6) The records specified in paragraphs (k)(6)(i) and (ii) of this section for each add-on control device organic HAP destruction or removal efficiency determination as specified in §63.3966.

(i) Records of each add-on control device performance test conducted according to §§63.3964 and 63.3966.

(ii) Records of the coating operation conditions during the add-on control device performance test showing that the performance test was conducted under representative operating conditions.

(7) Records of the data and calculations you used to establish the emission capture and add-on control device operating limits as specified in §63.3967 and to document compliance with the operating limits as specified in Table 1 to this subpart.

(8) A record of the work practice plan required by §63.3893 and documentation that you are implementing the plan on a continuous basis.

#### **§ 63.3931 *In what form and for how long must I keep my records?***

(a) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). You may keep the records off-site for the remaining 3 years.

#### ***Compliance Requirements for the Compliant Material Option***

#### **§ 63.3940 *By what date must I conduct the initial compliance demonstration?***

You must complete the initial compliance demonstration for the initial compliance period according to the requirements in §63.3941. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months. The initial compliance demonstration includes the calculations according to §63.3941 and supporting documentation showing that during the initial compliance period, you used no coating with an organic HAP content that exceeded the applicable emission limit in §63.3890,

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and that you used no thinners and/or other additives, or cleaning materials that contained organic HAP as determined according to §63.3941(a).

**§ 63.3941 How do I demonstrate initial compliance with the emission limitations?**

You may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the emission rate without add-on controls option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limits in §63.3890 and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to this section. Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in §§63.3892 and 63.3893, respectively. You must conduct a separate initial compliance demonstration for each general use, high performance, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. Use the procedures in this section on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. You do not need to redetermine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option.

(a) *Determine the mass fraction of organic HAP for each material used.* You must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of this section.

(1) *Method 311 (appendix A to 40 CFR part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test.

(i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (*e.g.*, 0.3791).

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- (ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point ( e.g., 0.763).
- (2) *Method 24 (appendix A to 40 CFR part 60).* For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in appendix A to subpart PPPP of this part, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to subpart PPPP of this part, as a substitute for the mass fraction of organic HAP.
- (3) *Alternative method.* You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.
- (4) *Information from the supplier or manufacturer of the material.* You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (3) of this section, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- (5) *Solvent blends.* Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to this subpart. If you use the tables, you must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and you may use Table 4 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table 3 or 4 to this subpart, the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- (b) *Determine the volume fraction of coating solids for each coating.* You must determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in paragraphs (b)(1) through (4) of this section. If test results obtained according to paragraph (b)(1) of this section do not agree with the information obtained under paragraph (b)(3) or (4) of this section, the test results will

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take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(1) *ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003).* You may use ASTM Method D2697-86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings" (incorporated by reference, see §63.14), or ASTM Method D6093-97 (Reapproved 2003), "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.

(2) *Alternative method.* You may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(3) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

(4) *Calculation of volume fraction of coating solids.* You may determine the volume fraction of coating solids using Equation 1 of this section:

$$V_s = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad (\text{Eq. 1})$$

Where:

$V_s$  = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

$m_{\text{volatiles}}$  = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

$D_{\text{avg}}$  = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(c) *Determine the density of each coating.* Determine the density of each coating used during the compliance period from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475-98 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

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(d) *Determine the organic HAP content of each coating.* Calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using Equation 2 of this section:

$$H_c = \frac{(D_c)(W_c)}{V_s} \quad (\text{Eq. 2})$$

Where:

$H_c$  = Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

$D_c$  = Density of coating, kg coating per liter (gal) coating, determined according to paragraph (c) of this section.

$W_c$  = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to paragraph (a) of this section.

$V_s$  = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to paragraph (b) of this section.

(e) *Compliance demonstration.* The calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit in §63.3890; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP, determined according to paragraph (a) of this section. You must keep all records required by §§63.3930 and 63.3931. As part of the notification of compliance status required in §63.3910, you must identify the coating operation(s) for which you used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and you used no thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in paragraph (a) of this section.

#### § 63.3942 *How do I demonstrate continuous compliance with the emission limitations?*

(a) For each compliance period to demonstrate continuous compliance, you must use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in §63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in §63.3940, is the end of a compliance period consisting of that month and the preceding 11 months. If you are complying with a facility-specific emission limit under §63.3890(c), you must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If you choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(5).

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(c) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the compliant material option. If there were no deviations from the applicable emission limit in §63.3890, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and you used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to §63.3941(a).

(d) You must maintain records as specified in §§63.3930 and 63.3931.

#### *Compliance Requirements for the Emission Rate Without Add-On Controls Option*

##### *§ 63.3950 By what date must I conduct the initial compliance demonstration?*

You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.3951. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.3951 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.3890.

##### *§ 63.3951 How do I demonstrate initial compliance with the emission limitations?*

You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.3890, but is not required to meet the operating limits or work practice standards in §§63.3892 and 63.3893, respectively. You must conduct a separate initial compliance demonstration for each general use, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on

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controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

(a) *Determine the mass fraction of organic HAP for each material.* Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.3941(a).

(b) *Determine the volume fraction of coating solids.* Determine the volume fraction of coating solids (liter (gal) of coating solids per liter (gal) of coating) for each coating used during each month according to the requirements in §63.3941(b).

(c) *Determine the density of each material.* Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If you are including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM Method D5965-02, "Standard Test Methods for Specific Gravity of Coating Powders" (incorporated by reference, see §63.14), or information from the supplier. If there is disagreement between ASTM Method D1475-98 or ASTM Method D5965-02 test results and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.

(d) *Determine the volume of each material used.* Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of this section.

(e) *Calculate the mass of organic HAP emissions.* The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of this section.

$$H_e = A + B + C - R_w \quad (\text{Eq. 1})$$

Where:

$H_e$  = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of this section.

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#### Subsection A. Emissions Unit 001

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of this section.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of this section.

R<sub>w</sub> = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to paragraph (e)(4) of this section. (You may assign a value of zero to R<sub>w</sub> if you do not wish to use this allowance.)

(1) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of this section:

$$A = \sum_{i=1}^m (Vol_{c,i})(D_{c,i})(W_{c,i}) \quad (Eq. 1A)$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

Vol<sub>c,i</sub> = Total volume of coating, i, used during the month, liters.

D<sub>c,i</sub> = Density of coating, i, kg coating per liter coating.

W<sub>c,i</sub> = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

m = Number of different coatings used during the month.

(2) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of this section:

$$B = \sum_{j=1}^n (Vol_{t,j})(D_{t,j})(W_{t,j}) \quad (Eq. 1B)$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

Vol<sub>t,j</sub> = Total volume of thinner and/or other additive, j, used during the month, liters.

D<sub>t,j</sub> = Density of thinner and/or other additive, j, kg per liter.

W<sub>t,j</sub> = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

n = Number of different thinners and/or other additives used during the month.

(3) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of this section:

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$$C = \sum_{k=1}^p (Vol_{s,k})(D_{s,k})(W_{s,k}) \quad (Eq. 1C)$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, kg.

Vol<sub>s,k</sub> = Total volume of cleaning material, k, used during the month, liters.

D<sub>s,k</sub> = Density of cleaning material, k, kg per liter.

W<sub>s,k</sub> = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

(4) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you must determine the mass according to paragraphs (e)(4)(i) through (iv) of this section.

(i) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater.

(ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month.

(iii) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section.

(iv) You must document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.3930(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(f) Calculate the total volume of coating solids used. Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$V_{st} = \sum_{i=1}^m (Vol_{c,i})(V_{s,i}) \quad (Eq. 2)$$

Where:

V<sub>st</sub> = Total volume of coating solids used during the month, liters.

Vol<sub>c,i</sub> = Total volume of coating, i, used during the month, liters.

V<sub>s,i</sub> = Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to §63.3941(b).

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m = Number of coatings used during the month.

(g) *Calculate the organic HAP emission rate.* Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per liter (gal) coating solids used, using Equation 3 of this section:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n V_{st}} \quad (\text{Eq. 3})$$

Where:

$H_{yr}$  = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.

$H_e$  = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of this section.

$V_{st}$  = Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of this section.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

(h) *Compliance demonstration.* The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section must be less than or equal to the applicable emission limit for each subcategory in §63.3890 or the predominant activity or facility-specific emission limit allowed in §63.3890(c). You must keep all records as required by §§63.3930 and 63.3931. As part of the notification of compliance status required by §63.3910, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.3890, determined according to the procedures in this section.

#### **§ 63.3952 How do I demonstrate continuous compliance with the emission limitations?**

(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.3951(a) through (g), must be less than or equal to the applicable emission limit in §63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under §63.3890(c), you must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation.

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**Subsection A. Emissions Unit 001**

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890, this is a deviation from the emission limitation for that compliance period and must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(6).

(c) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890, determined according to §63.3951(a) through (g).

(d) You must maintain records as specified in §§63.3930 and 63.3931.

[40 CFR63, §63.3891; Rule 62-213.440, F.A.C.]

**SECTION IV. APPENDICES.**

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**The Following Appendices Are Enforceable Parts of This Permit:**

Appendix A, Glossary.

Appendix I, List of Insignificant Emissions Units and/or Activities.

Appendix NESHAP, Subpart A – General Provisions.

Appendix NESHAP, Subpart MMMM – Surface Coating of Miscellaneous Metal Parts and Products.

Appendix RR, Facility-wide Reporting Requirements.

Appendix TR, Facility-wide Testing Requirements.

Appendix TV, Title V General Conditions.

