

STATEMENT OF BASIS

Hudson Tool & Die Company
Ormond Beach Facility
Facility ID No.: 1270060
Volusia County

Title V Air Operation Permit Renewal
PROPOSED Permit No.: 1270060-003-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of a tool and die process using degreasers. The process includes the following:

A Detrex Cross-rod Batchcold degreaser. Parts are moved through the TCE in baskets. Vapors are controlled and collected. Collected vapors are drawn through activated carbon adsorption.

A HMP open-top batch cold degreaser holds approximately 80 gallons of TCE. Parts are lowered into the baths by a time-controlled loading/unloading mechanism. Solvent vapors are controlled and collected by the lip exhaust, refrigerated chillers, ultra chillers, and solvent vapor carbon adsorption system.

A plastic dipline in which parts are manually dipped into a container (1-2 gallon) holding a mixture of mineral spirits, the carrier, and a plastic lubricant.

A lubricant process in which a mineral spirit and plastic lubricant mixture are sprayed onto the metal prior to cutting.

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

Based on the most recently received Title V permit application received July 23, 2004, this facility is a major source of hazardous air pollutants (HAPs).

The applicable emission limitations are as follows:

Tool and die process using degreasers - General visible emission standard per Rule 62-296.320(4)(b)1., F.A.C.; VOC and HAP limits per construction permit and NESHAP-40 CFR 63 Subpart T, national emission standards for halogenated solvent cleaning and subpart A, general provisions adopted and incorporated by reference in Rule 62-204.800(10), F.A.C.



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

E-CORRESPONDENCE

dilellap@hudsontool.com

Peter DiLella, Vice President
Hudson Tool & Die Company
1327 U.S. Highway 1
Ormond Beach, Florida 32174

Re: PROPOSED Title V Air Operation Permit Project No.: 1270060-003-AV
Ormond Beach Facility

Dear Mr. DiLella:

One copy of the PROPOSED PERMIT DETERMINATION for the PROPOSED Title V Air Operation Permit for the Ormond Beach Facility located at 1327 U.S. Highway 1, Ormond Beach, Volusia County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit.

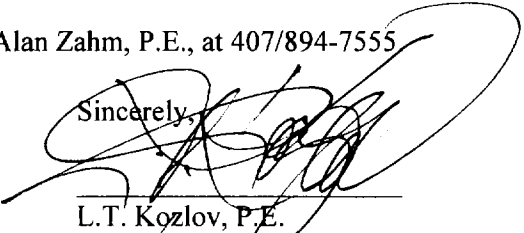
An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

http://www.dep.state.fl.us/air/permitting/airpermits/AirSearch_ltd.asp

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you have any questions, please contact Alan Zahm, P.E., at 407/894-7555

Sincerely,


L.T. Kozlov, P.E.
Program Administrator
Air Resources Management

Date

11-16-07


LTK/jt
Enclosures

Cc: James C. Collela, P.E. (jcbjcollela-cai@prodigy.net)
Al Linero, P.E., DARM, Title V Section

"More Protection, Less Process"

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PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 1270060-003-AV

Page 1 of 1

I. Public Notice.

An “INTENT TO ISSUE TITLE V AIR OPERATION PERMIT” to Hudson Tool & Die Company, located at 1327 U.S. Highway 1, Ormond Beach, Volusia County, Florida was clerked on September 23, 2004. The “PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT” was published in the Daytona Beach News Journal newspaper on October 16, 2004. The DRAFT Title V Air Operation Permit was available for public inspection at the permitting authority’s office in Orlando. Proof of publication of the “PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT” was received on October 20, 2004.

II. Public Comment(s).

No comments were received during the 30 (thirty) day public comment period. Since no comments were received, the DRAFT Permit becomes the PROPOSED Permit.

III. Conclusion.

Since there were no comments received during the Public Notice period, no changes were made to the DRAFT Permit and the permitting authority hereby issues the PROPOSED Permit.

Hudson Tool & Die Company
Ormond Beach Facility
Facility ID No.: 1270060
Volusia County

Title V Air Operation Permit

PROPOSED Title V Operation Permit No.: 1270060-003-AV

Permitting and Compliance Authority:
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803

Telephone: 407/893-3334
Fax: 407/897-5963

Title V Air Operation Permit

PROPOSED Title V Operation Permit No.: 1270060-003-AV

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Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

Permittee:

Hudson Tool & Die Company
1327 U.S. Highway 1
Ormond Beach, Florida 32174
Attention: Peter DiLella, Vice President

PROPOSED Permit No.: 1270060-003-AV

Facility ID No.: 1270060

SIC Nos.: 34, 3469

Project: Title V Air Operation Permit

The purpose of this permit is the operation of the Ormond Beach Facility located at 1327 U.S. Highway 1, Ormond Beach, Volusia County; UTM Coordinates: Zone 17, 489.1km East and 3243.8 km North; Latitude: 29° 19' 30" North and Longitude: 81° 07' 00" West.

STATEMENT OF BASIS: This Title V Air Operation Permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213 and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix H-1, Permit History/I.D. Number Changes
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-4, TITLE V CONDITIONS (version dated 2/12/02) to permittee only
Appendix Subparts A and T

Initial Effective Date:	to be determined
Renewal Application Due Date:	June 30, 2009
Expiration Date:	December 30, 2009

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

L. T. Kozlov, P.E.
Program Administrator
Air Resources Management

LTK/jt

Section I. Facility Information.

Subsection A. Facility Description.

This facility is a tool and die operation with degreasers.

A Detrex Cross-Rod batch cold degreaser. Parts are moved through the TCE in baskets. Vapors are controlled and collected. Collected vapors are drawn through activated carbon adsorption.

A HMP Branson open-top batch cold degreaser holds approximately 80 gallons of TCE. Parts are lowered into the baths by a time-controlled loading/unloading mechanism. Solvent vapors are controlled and collected by the lip exhaust, refrigerated chillers, ultra chillers, and solvent vapor carbon adsorption system.

Based on the Title V permit application received July 23, 2004, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No./Brief Description

001 Tool & Die Operation with Degreasers as described above.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

These documents are on file with the permitting authority:
Title V Operation Permit Renewal Application received July 23, 2004.
Initial Title V Operation Permit Application received September 7, 2004.

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-4, TITLE V CONDITIONS, is a part of this permit.

{Permitting note: APPENDIX TV-4, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).

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

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, Maryland 20703-1515
Telephone: 301/429-5018

and,

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

[40 CFR 68]

5. Insignificant Emissions Units and /or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.

6. General Pollutant Emission Limiting Standards. 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 (VOC) or organic solvents (OS) 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:

- a) Tightly cover or close all VOC containers when they are not in use;
- b) Tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use;

- c) Maintain all piping, valves, fittings, etc. in good operating condition;
- d) Prevent excessive air turbulence across exposed VOCs; and
- e) Immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C. and Construction Permit 1270166-003-AC]

7. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)©1., 3.&4., F.A.C., reasonable precautions to prevent unconfined emissions of unconfined particulate matter at this facility include the following requirements:

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

[Rule 62-296.320(4)(c)2., F.A.C.]

8. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

9. Annual Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-4, TITLE V CONDITIONS)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the following office:

Florida Department of Environmental Protection
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803
Telephone: 407/893-3334; Fax: 407/897-5963

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

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch, Air Compliance Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155; Fax: 404/562-9163

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

[Rule 62-213.420(4), F.A.C.]

13. Annual Operating Report. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year on or before March 1 of the following year and submitted to the air compliance section of this office.

[Rule 62-210.370(3), F.A.C.]

14. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to this office four copies of the air permit application, DEP Form No. 62-210.900(1).

[Rule 62-4.090(1), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No./ Brief Description

001 Tool & Die Operation with Degreasers

{Permitting note: The degreasers are regulated under NESHAP - 40 CFR 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning and Subpart A, General Provisions, adopted and incorporated by reference in Rule 62-204.800(10), F.A.C.}

The following conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A1. Hours of Operation. The emissions unit is permitted to operate continuously.
[Rule 62-210.200, (PTE), F.A.C. and construction permit 1270060-001-AC]

A2. Capacity. Usage of Volatile Organic Compounds (VOC) at the facility are limited to less than 50 tons per consecutive 12-month period. Usage of Hazardous Air Pollutants (HAPs), as defined by Rule 62-210.200, F.A.C., are limited to less than 50 tons per consecutive 12-month period.
[Rule 62-210.200, (PTE), F.A.C. and construction permit 1270060-001-AC]

A3. No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly.
[Rules 62-210.200, (PTE), F.A.C. and 62-210.650, F.A.C.]

Emission Limitations and Standards

A4. The maximum permitted emissions of total VOCs are limited to less than 50.0 tons per consecutive 12-month period; the maximum permitted emissions of total HAPs are limited to less than 50.0 tons per consecutive 12-month period, and the maximum permitted emissions of any single HAP are limited to less than 50.0 tons per consecutive 12-month period; all VOC and HAP emissions updated monthly
[Rule 62-210.200, (PTE), F.A.C. and construction permit 1270060-001-AC]

Recordkeeping and Reporting Requirements

A5. In order to demonstrate compliance with conditions A2 and A4, the permittee shall maintain a monthly log at the facility. The log shall be completed by the end of the following month and retained on file at the facility for at least five years.

The log, at a minimum shall contain the following:

- a) Designation of the month and year of operation for which the records are being tabulated; and
- b) Consecutive 12 month totals of total VOC, combined HAPs, and individual HAP emission rates.

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.

[Rule 62-4.070(3), F.A.C.]

A6. 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, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) 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.

Volatile matter content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coatings, and inks, using EPA Reference Method 24 and 24A, or the Department shall accept a certification by the coating manufacturer of the composition of the coating if it is supported by standard formulation records for catalog paints or actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings". The documents shall be kept at the facility for at least five years and made available to the Department.

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

40 CFR 63, Subparts A and T

A7. The degreasers in this subsection are subject to the applicable requirements contained in 40 C.F.R. 63, Subparts A and T, which are incorporated by reference and attached to this permit (APPENDIX SUBPARTS A & T). The company will maintain records to show compliance with Subpart T.

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Abbreviations and Acronyms:

°F: Degrees Fahrenheit
BACT: Best Available Control Technology
CFR: Code of Federal Regulations
DEP: State of Florida, Department of Environmental Protection
DARM: Division of Air Resource Management
EPA: United States Environmental Protection Agency
F.A.C.: Florida Administrative Code
F.S.: Florida Statute
ISO: International Standards Organization
LAT: Latitude
LONG: Longitude
MMBtu: million British thermal units
MW: Megawatt
ORIS: Office of Regulatory Information Systems
SOA: Specific Operating Agreement
UTM: Universal Transverse Mercator

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.

Code of Federal Regulations:

Example: [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where:

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by permit tracking database
001 or 002 = 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC = old Air Construction Permit numbering

Appendix H-1, Permit History/ID Number Changes

Hudson Tool & Die Company
Ormond Beach Facility

PROPOSED Permit No.: 1270060-003-AV
Facility ID No.: 1270060

Permit History (for tracking purposes):

<u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> ^{1, 2}	<u>Revised Date(s)</u>
E.U. -001	Tool & Die Process using Degreasers	AC64-190129 AO64-228398 1270060-001-AC 1270060-002-AV	3/6/91 7/16/93 6/29/99 3/14/00	2/28/93 6/30/98 5/30/04 12/30/04		

(if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: N/A

To: Facility ID No.: N/A

Notes:

- 1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

Hudson Tool & Die Company
Ormond Beach Facility

PROPOSED Permit No.: 1270060-003-AV
Facility ID No.: 1270060

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62-210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6).

Brief Description of Emissions Units and/or Activities

1. Boiler-fired by propane/natural gas.
2. Lubricating oil/solvent used in the pressing/drawing process of the metals.
3. Water evaporator (steam) - Handles water from the air compressors, floor wash waters, and neutralized waste water.
4. Annealing Oven
5. Rust preventative tumblers.
6. Plastic dip line using containers less than 5 gallons in size.