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|  1030132 75796 |  |
|  **FACILITY:** **Onesource Coil Coaters, LLC** |  **PERMIT ID: 35** |
|  |  **DISTRICT:** Southwest |
|  **ADDRESS:** 5110 140th Avenue North | **CONTACT PHONE:**  |
|  Clearwater, FL | 727-535-6160 |
|  **ARMS NO:****1030132 001** | **PERMIT NO:** | **Expiration Date:** 6/19/11**Renewal Date:** 4/20/11 |
|  | **1030132-011-AF** |  |
|  |  | **Test Due Date:** 11/3/00 |
| **EMISSION UNIT DESCRIPTION:** **Coil Coating Line No. 1: Continuous Coil coating line with a PermanentTotal Enclosure. Emissions are controlled by a Phoenix, Model No. 6000, Serial No. 1041444 Thermal Incinerator** |
| **INSPECTION DATE:** | **ARMS INSPECTION TYPE:** | **COMPLIANCE STATUS:** |
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|  | **May 10th, 2011** |  |  | INS**1** | **✓** | **INS2** |  | INS**3** |  | FUI |  | **IN** | **✓**  | MNC |  | SNC |
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|  |
| **INSPECTION TYPE:** | **✓** | **Initial** |  | Re-inspection |  | Complaint |  | Drive-by |  | Quarterly |
|  |
| **✓** | **A. General Review:** |
| **1.** | Permit File Review | *[x]*  | Yes | *[ ]*  | No |
|  | ***Comments:*** *I performed this annual inspection to determine One Source Coil Coater’s compliance status with permit conditions and applicable rules. Ms. Nancy Knight, Permit Engineer, from the FDEP, SWD was present to inquire and obtain information relevant to the permit renewal process for the facility. Mr. Venki Sastri, the Facility Contact,, greeted us and introduced Mr. Dan Furnare, the Production Manager. Mr. Sastri answered most of our questions and provided some of the information that was required. No tests were scheduled during this inspection. The initial inspection was performed on May 10th, 2011. Wayne Martin, the Criteria Pollutants Section Manager, and I, returned on May 25th, 2011 to obtain more information from One Source Coil Coaters about the temperature charts, the Chart Recorder and the Calibration performed by Tampa Calibration Services on May 16th, 2011. I also returned on June 6th and 7th, 2011 to observe Certification of the Thermocouples, the Calibration of the Chart recorder and to observe performance of the “Lock-Out” procedure which causes the Coating Rolls to be disengaged from the substrate by pneumatic release, effectively stopping the loading of VOCS into the Drier and the Incinerator.*  |  |  |  |  |
| **2.** | Introduction and Entry | *[x]*  | Yes | *[ ]*  | No |
|  | ***Comments:***  *Ms. Knight asked questions re: the equipment currently on-hand. The facility now has one (1) Incinerator with a Coating line, vs two (2) incinerators, each with a Coating line, when the permit was issued 5 years ago. Mrs. Knight stated that as a result of having only one (1) Incinerator instead of two (2), the CO emission limits would come down significantly. Ms. Knight asked questions re: the operating temperature of the Incinerator at the beginning of Coating operations. Mr. Sastri stated that Coating begins when the temperature has reached 1,200oF and then with the VOC loading , it scales-up beyond 1,415o F. Mr. Sastri stated that the temperature can’t be brought-up to 1,415oF with the Natural Gas Burners alone, because, he added, the Incinerator is not designed to do that. Ms. Knight noted that she would look at how the FDEP could re-structure the wording for this condition as explained by Mr. Sastri. I informed Mr. Sastri that I was there to perform an annual inspection, which would include a review of Material Usage, VOC Logs and O & M Logs plus a walk through the floor.* |  |  |  |  |
| **3.** | **Is the Responsible Official/Authorized Representative still: M.S. Sastri?** | *[x]*  | Yes | *[ ]*  | No |
|  | ***C****omments:* **The Responsible Official/Authorized Representative’s e-mail is:**  |
| **4.** | **Is the facility contact still:** Venki Sastri**?** | *[x]*  | Yes | *[ ]*  | No |
|  | ***C****omments:* **The facility contact’s e-mail is: vmsastri@onesource-llc.com** |

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| **IN** | **MNC** | **SNC** | **B. Specific Conditions:**  |
|   |  |  | *Inspection Note: This permit, with an effective date of 6/19/06 changes the name from Cooper Coating Company, LLC to Onesource Coil Coaters, LLC. And replaces 1030132-010-AF*This permit or a copy thereof shall be kept at the work site of the permitted activity. [62-4.160 F.A.C. - General Condition 12.]***Comments****: The facility [x]  did have a copy of the permit on-site.*3. Facility-Wide HAP and CO Emission Limitations: The maximum allowable facility-wide emissions shall not exceed the following:A. 9.01 tons total HAP emissions per any consecutive 12-month period.B. 99 tons of CO emissions per any consecutive 12-month period. (also see Specific Condition Nos. A.4.E. and B.5.D. [1030132-010-AF]***Comments****: The 12 month running cumulative total HAPS emissions at the end of December 2010 were 0.12 tons.*5. 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). [Rule 62-296.320(4)(b)1., F.A.C.]***Comments****: There were no particulate emissions emanating from One Source Coil Coaters.*6. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is 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. [Rules 62-210.200 and 62-296.320(2), F.A.C. & Pinellas County Code, Section 58-178]7. 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. The facility shall comply with the following:A. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials.B. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.C. Tightly cover or close all VOC containers when they are not in use.D. Prevent excessive air turbulence across exposed VOCs.E. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.  [Rule 62-296.320(1)(a), F.A.C.]***Comments****: When I arrived on May 10th, 2011, I detected a strong solvent odor, which turned out to be Acetone being used to clean a paint spill next to the Permanent Total Enclosure (PTE). Acetone use is recorded as an Organic Solvent (OS) by One Source Coil Coaters. Acetone is not a Hazardous Air Pollutant (HAP) and is no longer listed as a VOC. As time passed-by during my inspection, the odor disappeared as the spill area dried and the Acetone evaporated. After that, there were no odors that could be linked to the coating operation. The paint drums and Acetone cans were kept sealed at all times. Acetone is the only clean-up solvent used by One Source Coil Coaters.*8. Annual Operating Report for Air Pollutant Emitting Facility. Submit to the Air Compliance Sections of this office and Pinellas County Department of Environmental Management (PCDEM) for this facility, each calendar year and on or before March 1, an emission report [DEP Form 62-210.900(5)] for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be submitted. [Rule 62-210.370(3), F.A.C.]***Comments****: The One Source Coil Coaters 2010 AOR was received on 4/8/2011.*9. Permit Renewal Application Requirements:A.1. **For Emission Unit No. 001** - At least three applications to renew the operation of this emission unit shall be submitted to the Air Permitting Section of this office and one application shall be submitted to the PCDEM prior to 60 days before the expiration date as shown on page 1 of this permit…[Rules 62-4.090, 62-4.070(3) & 62-210.300(2), F.A.C.]***Comments****: The One Source Coil Coaters permit, 1030132-011-AF, expired on 6/19/2011.* *According to the permit, One Source Coil Coaters was required to submit a permit renewal application prior to 60 days before the expiration of the permit, i.e. 4/20/2011 at the latest.  The One Source Coil Coaters application was received one week late by the FDEP, SWD on 4/27/2011, per the ARMS entry. I informed Gary Robbins and Wayne Martin of this situation by e-mail on 7/12/2011. Gary Robbins stated that he would consult on the issue with Nancy Knight.* Emission Unit No. 001A.2. Reasonably Available Control Technology (RACT) Requirements: Coating Line No. 1 is subject to the requirements of Rule 62-296.502, F.A.C. – *Coil Coating*.[Rule 62-296.502, F.A.C.]A.3. Emission Limitations: Coil Coating Line No. 1 shall not discharge into the atmosphere more than:A. 10% of the VOCs applied each calendar month (90% emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency. [40 CFR 60.462(a)(3)]*Permitting Note: The 90% emission reduction in subpart TT refers to an overall destruction efficiency, which is the result of destruction efficiency* **x** *capture efficiency. Compliance with this* *limit ensures that the Line No. 1 thermal oxidizer meets the minimum VOC destruction efficiency (90%) of Rule 62-296.502(3)(b), F.A.C.*B. 4.0 lbs. VOC/gal. of solids (24-hour weighted average), excluding water, delivered to the coating applicator. [Rules 62-296.500(5), 62-296.500(6), & 62-296.502(2), F.A.C.]C. 10.5 lbs. VOC/hr (monthly average basis) and 46.0 tons VOC per any consecutive 12-month period. [1030132-010-AF]D. Visible emissions from the thermal oxidizer shall not be equal to or greater than 20% opacity.[Rule 62-296.320(4)(b), F.A.C.] [Rule 62-210.200(PTE), F.A.C.; 1030132-010-AF]***Comments****: A. The most current test of the incinerator yielded an Over-All Destruction Efficiency of* *97.57 %*  *B. The VOCs per gallon of solids delivered to the coating applicator were typically 0.035* *Lbs VOCs/gal solids* *C. The VOC/hr (monthly average basis) was 2.86 lbs/hr and 0.25 tons VOC in the* *consecutive 12-month period at the end of December 2010.* *D. The Opacity during testing was 0.0%* A.4. Operational Limitations: The permittee shall comply with the following:A. The maximum allowable VOC loading rate into the thermal oxidizer is 247 lbs./hr. Note, based on the VOC emission compliance test conducted on October 6, 2005, the current maximum permitted thermal oxidizer loading is 112.2 lbs./hr. (102.0 x 1.10). The test was conducted at a VOC inlet loading rate to the thermal oxidizer of 102.0 lbs./hr. (See Specific Condition No. C.5.F. for information on increasing the current inlet loading rate up to 247 lbs./hr.)B. The thermal oxidizer shall be only fired with natural gas at a maximum heat input rate of 5 MMBTU/hr. based on a monthly average. (see Specific Condition No. C.4.E.14.)C. The finish oven and hot pretreatment degreaser Stages 1, 2, and 3 shall be only fired with natural gas with a sum total maximum heat input rate not to exceed 10.1 MMBTU/hr. based on a monthly average. (see Specific Condition No. C.4.E.14.)D. The thermal oxidizer's bypass stack shall not be in use at any time that coating is in progress.E. The run mode set point for the thermal oxidizer shall be set to 1420° F (771° C). To ensure that carbon monoxide emissions are kept below Title V applicability levels, the temperature of the thermal oxidizer shall not fall below 1415° F (768° C) during coating of metal for more than five minutes in any one-hour period. (A single deviation does not necessarily constitute an enforceable violation; rather, a corrective action report shall be submitted to the Air Compliance Section of this office and the PCDEM within 10 business days of the deviation. This does not apply during times when the line has stopped. [Rule 62-210.200(PTE), F.A.C.; 1030132-010-AF]***Comments****: A. The VOC process rate was a high of 26.43 lbs during the 3rd Quarter of 2010.*1. *The Thermal Oxidizer and the finish oven and hot pretreatment degreaser are fired only on Natural gas. The thermal oxidizer and the finish oven and hot pretreatment degreaser typically used a combined high of ≈ 8.0 MMBTU/hr.*
2. *The By-pass stack was not in use while the thermal oxidizer was in operation.*
3. *During the walk thru inspection, I observed that the temperature of the thermal oxidizer was 1,425o F*

A.5. Emission Testing Requirements: The thermal oxidizer shall be tested as follows:A. For visible emissions and VOC capture efficiency **annually** within 60 days prior to or on the date of November 3. The visible emission test and VOC capture efficiency test to be conducted on November 3, 2007, are to be delayed and conducted with the VOC emission test and VOC overall destruction efficiency test required to be conducted on May 3, 2008 (see B. below). B. For VOC emissions and VOC overall destruction efficiency at **2½ year intervals** from the base date of November 3, 2005. The 2 ½ year interval sequence shall be considered as within 60 days prior to or on of the date of May 3, 2008, within 60 days prior to or on the date of November 3, 2010, and so forth.C. For CO emissions within 60 prior to or on the date of November 3, 2010.[Rule 62-297.310(7), F.A.C.]***Comments****: The EU is in compliance with the frequency of testing requirements in A., B. and C. above.*Common Conditions for Emission Unit Nos. 001 and 002C.1. Clean-up Solvent Emission Requirements: Clean-up solvent emissions from Line Nos. 1 and 2 shall not exceed 1.2 tons and 1.0 tons of VOC per any consecutive 12-month period, respectively.[AC52-121698 and AC52-243047]***Comments****: One Source Coil Coaters does not use VOCS for Clean-up. One Source Coil Coaters uses Acetone.*C.2. Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable control device operating properly. Operation of the coating lines shall not occur unless the appropriate thermal oxidizer is operating properly.[Rule 62-210.650, F.A.C.]***Comments****: I visited One Source Coil Coaters on June 6th, 2011 to observe the “Lock Down” of the Coater when the temperature dips below 1,415oF. Since there is a manual pneumatic release lever in the Coating Room, I asked Mr. Sastri to instruct the production personnel to vacate the Coating Room while the test was being performed, as a way of insuring integrity of the “automatic lock-down results”. Mr. Sastri turned the Incinerator off in my presence when it was operating at 1,430oF, and when the temperature dipped below 1,415oF, an alarm sounded, and, as I walked towards the empty Coating Room, I heard a hissing sound which I verified resulted from disengagement of the Coating Rolls (Top & Bottom) from the substrate. This, therefore, effectively stopped loading of VOCS into the incinerator.*C.3. Operation and Maintenance (O&M) Plan requirements: The attached O&M Plan, and as revised, with prior approval of the PCDEM, shall be followed for the thermal oxidizers. The O&M Plan documentation logs shall be maintained for a minimum of 3 years. At a minimum the O&M Plan shall also include:A. The operating parameters of the control device.B. Timetable for the routine maintenance of the pollution control device as specified by the manufacturer.C. Time table for routine periodic observations of the pollution control device sufficient to ensure proper operation.D. A list of the type and quantity of the required spare parts for the pollution control device, which are stored on the premises.E. A record log which will indicate, at a minimum: 1. When maintenance and observations were performed.  2. What maintenance and observations were performed. 3. Who performed said maintenance and observations. 4. Acceptable parameter ranges for each operational check. [Pinellas County Code, Section 58-128]**40 CFR 60.11 Compliance with standards and maintenance requirements.**  (d) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. ***Comments****: The One Source Coil Coaters O & M Plan for the Phoenix 6000 Incinerator requires Weekly, Monthly, Semi Annual and Annual Checks. Mr. Sastri provided me O & M Logs which reveal that the Weekly, Monthly and Semi-Annual Checks have been performed, but not the Annual Checks, which consist of :* *(1) – Check the fan Motor shafts for endplay not to exceed 0.005 inches.*  *(2) – Replace the fan seals if they are leaking* *(3) – Check all gaskets and seals. Replace any that are broken, brittle or leaking**Part of the O & M requires Calibration of the Incinerator Temperature Chart Recorder and Certification of the Incinerator Thermocouples. Tampa Calibration Services (Mr. Leo Baumgartner) performed a check of the Temperature Controller on 5/16/2011 and found it to be operating within specifications. (“The temperature indication on the digital display was compared to our standard and it was determined to be within the manufactures tolerance”). Tampa Calibration Services noted in its report that “ The Chart Recorder was not recording”.* *On 6/6 & 7/2011, Technical Maintenance Inc. (Mr. Brian Johnson) located at 12530, Telecom Drive, Temple Terrace, Fl 33637****;*** *tel****:*** *813-978-3054****;*** *web****:****www****.****tmicalibration****.****com, certified all of the thermocouples used by the Incinerator, the Dryer and the Wash & Rinse Tanks at One Source Coil Coaters. I called Brian Johnson on 7/13/2011 to obtain clarification on the Temperature Chart Recorder Report which stated that the Celsius Scale had been used to calibrate it at 1,000; 1,200; 1,400; and 1,500oC. On the day of the test, I observed the use of the Fahrenheit Scale at those numbers. Mr. Johnson agreed that the scale used was Fahrenheit and he committed to re-submitting page 2 of 2 for Certificate of Calibration A928285 with a cover letter explaining the errata on or before 7/15/2011.***C.4.** Monitoring, Recordkeeping, and Reporting Requirements: The permittee shall comply with the following:A. The permittee shall install calibrate, maintain, and operate a monitoring device which continuously measures and permanently records each thermal oxidizer's combustion temperature per the manufacturer's specifications. The monitoring device shall have an accuracy of +2.5oC or +0.75 percent of the temperature being measured expressed in oC, whichever is greater. The temperature chart paper (or equivalent) shall be calibrated in oC, and the temperature range of the chart and instrumentation shall provide sufficient resolution to clearly indicate the operating temperature of the thermal oxidizer and to also show compliance with the requirements in Specific Condition No. C.4.B. below. The production start and stop times shall be recorded on each production run sheet.[40 CFR 60.464(c) & Rule 62-4.070(3), F.A.C.]B. During coating operations, the permittee shall record all periods in excess of 3 hours during which the temperature in the thermal oxidizer remains more than 28oC (50oF) (by NSPS standard) below the following:  1. Line No. 1 thermal oxidizer: 1420°F (771°C) *(Permitting note: See Specific Condition No. A.4.E.)* 2. Line No. 2 thermal oxidizer: 1420°F (771°C) *(Permitting note: See Specific Condition B.5.D.)* The records shall identify each such occurrence and its duration. The records shall include the temperature observed from hourly checks of the thermal oxidizer. The temperature records shall be maintained at the facility for a period of at least two years and shall be made available to the Department or the PCDEM upon request. [40 CFR 60.464(c) & Rule 62-4.070(3), F.A.C.]C. For each coating line, the permittee shall each calendar month calculate the monthly VOC emissions based on the usage rates of coating, their VOC content, and the VOC destruction efficiency established during the latest stack test in accordance with the procedures in 40 CFR 60.463(c)(2). [40 CFR 60.463(c) & Rule 62-4.070(3), F.A.C.]D. The permittee shall submit a **quarterly report** identifying each instance in which: 1. The volume-weighted average VOC emissions is greater than 10% of the VOC’s applied (i.e., less than 90% emission reduction, as demonstrated in the last accepted VOC overall destruction efficiency compliance test). 2. The thermal oxidizers’ temperature deviates below 28oC (50oF), as defined in Specific Condition No. C.4.B. 3. If no such instances occur in the quarter the report shall state such. [40 CFR 60.465(c) and (d)]E. The permittee shall maintain a separate log for each coil coating line. The log shall include, at a minimum, the following information: DAILY1. The applicable rule - 40 CFR 60, Subpart TT*, Standards of Performance for New Stationary Sources (NSPS)*, *Metal Coil Surface Coating*, and Rule 62-296.502, F.A.C*.,* *Coil Coating (RACT).* 2. The source description (i.e., Line 1, Line 2, or Facility-Wide). 3. The substrate type, which is being coated (e.g., metal). 4. Date - day, month, year. 5. On a daily basis, what "As Applied" coatings (by identification number), indicating the amount of each coating used in gallons and its total VOC and HAP content in percent by weight. 6. On a daily basis, each clean up solvent used less volatile portions recycled or returned, in lbs/day and its VOC and HAP content in percent by weight.  7. The hourly thermal oxidizer temperatures per Specific Condition No. C.4.B. MONTHLY 8. The hours of operation per month. 9. The monthly VOC's as applied, lbs or tons. 10. The monthly VOC's emitted, after controls, lbs or tons. 11. The average hourly emissions for each month (lbs/hr), in order to ensure that hourly VOC emission limit per Specific Condition Nos. A.3.C. and B.4.C. are not exceeded. 12. A monthly total for CO, VOC, and HAP emissions and the most recent cumulative 12 consecutive month running totals to ensure that annual limits per Specific Condition Nos. 3, A.3.C., and B.4.C. are not exceeded. 13. A monthly total of all VOC emissions from clean up solvents combined, and the most recent cumulative 12 consecutive month running total, to ensure that the annual limit per Specific Condition No. C.1. is not exceeded.  14. The average monthly MMBTU/hr. for the following, in order to demonstrate compliance with Specific Condition Nos. A.4. and B.5., since each Line has its own natural gas meter: - Line No. 1's thermal oxidizer and all of its associated equipment to demonstrate compliance with an average monthly total of 15.1 MMBTU/hr. - Line No. 2's thermal oxidizer and all of its associated equipment to demonstrate compliance with an average monthly total of 14.0 MMBTU/hr.Records of all calculations used to determine VOC emissions, and supporting documentation ("As Supplied", "As Applied" sheets, MSDS, EPA data sheets, purchase orders, etc.) shall be kept for each coating and VOC/HAP/organic solvent which includes sufficient information to determine VOC/HAP/organic solvent emissions. The above records shall include the **facility's name**, be maintained at the facility for at least three years, and made available to the Department and the PCDEM upon request.[Rules 62‑296.500(2)(b), F.A.C., 62‑296.500(5), F.A.C., 62‑4.070(3), F.A.C., 40 CFR 60.465(c), 40 CFR 60.465(e), and Pinellas County Code Section 58-90]**C.5.**  Compliance Testing Requirements: The permittee shall comply with the following:A. VOC Test Methods: VOC destruction efficiency and VOC emissions testing shall be conducted using EPA Methods 1-4, and 25. The sampling time for each of the three EPA Method 25 runs shall be at least 60 minutes and be at least 0.003 dry standard cubic meters. During the compliance test, a sample of each coating shall be taken and an EPA Method 24 test performed. The coating sample must be at least 1 liter and be representative of the coating as applied to the metal coil. Data provided from the coating formulator may be submitted in lieu of the Method 24 test if the certification form in EPA 450/3-84-019 is properly completed for each affected coating. The minimum requirements for stationary point source emission test procedures shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60 Appendix A. [Rules 62-296.502(4)(b) & 62-297.310(7)(a), F.A.C.]B. CO Test Method: CO emissions testing shall be conducted using either EPA Method 10 or 10B. The sampling time for each of the three runs shall be a minimum of 60 minutes in duration and when required test dates correspond be conducted concurrently with the Method 25 test runs. The minimum requirements for stationary point source emission test procedures shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60 Appendix A. [Rule 62-4.070(3), F.A.C.]C. Visible Emission Test Method: Visible emissions testing shall be conducted using EPA Method 9 and be a minimum of 30 minutes in duration and be conducted concurrently with one of the Method 25 test runs. The minimum requirements for stationary point source emission test procedures shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60 Appendix A. [Rule 62-297.310(7)(a)4.a., F.A.C.]D. A permanent total enclosure exists for Line No. 1 and Line No. 2. The facility shall demonstrate that each enclosure meets the requirement given in Method 204 for a Permanent Total Enclosure as required by Specific Condition No. A.5.A. and during any required control device efficiency test. (See Condition Nos. A.5., B.6., and C.4.D.) [40 CFR 60.463(c)(2) & Rule 62-297.450(1)(a), & 62-297.450(4)(e), F.A.C.] E. A test protocol for each coating line shall be submitted to the Air Compliance Section of the PCDEM at least 60 days prior to testing.[Rule 62-4.070(3), F.A.C.]F. Compliance testing should be accomplished when the coil coating line is operating within 90-100% of the maximum design VOC loading rate established in Specific Condition Nos. A.4.A. and B.5.A. If it is impracticable to test at this rate, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate up to the maximum allowable VOC loading rate. Testing at conditions, which are not representative of normal operating conditions may invalidate the test.[Rules 62-297.310(2) & 62-4.070(3), F.A.C.]G. The permittee shall notify the Air Compliance Section of the PCDEM at least 30 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 owner. [Rule 62-297.450(4)(d), F.A.C.]H. Test Reports: The permittee of an air pollution emissions unit, for which compliance tests are required, shall file a report with the Air Compliance Section of this office and the PCDEM on the results of each such test. The required test report shall be filed as soon as practical but no later than 45 days after each test is completed. The test report submittal shall meet all applicable requirements of Rule 62-297.310(8)(c), F.A.C. and specifically include:  1. The test data and calculations required to demonstrate compliance with the emissions limitations in Specific Condition Nos. A.3.A., A.3.B., A.3.D., B.4.A., B.4.B, and B.4.D. 2. The temperature of the thermal oxidizer(s), temperature charts (or equivalent) and calculations required to demonstrate compliance with Specific Condition Nos. A.4.E., B.5.D., C.4.A., and C.4.B. 3. The VOC destruction efficiency and VOC capture efficiency results, and the overall destruction efficiency (result of destruction and capture efficiency) required to demonstrate compliance with Specific Condition Nos. A.3.A. and B.4.A. 4. Utilization rates of the coating(s) in gallons per hour. 5. VOC content of the product coating(s) required to demonstrate compliance with Specific Condition Nos. A.3.B. and B.4.B. 6. The VOC loading rate to the thermal oxidizer(s), in lbs/hr. to demonstrate compliance with Specific Condition Nos. A.4.A. and B.5.A. 7. When CO emission testing is required, the test data and calculations required to determine CO emissions in lbs/hr. 8. The test data and calculations required to demonstrate compliance with Specific Condition No. C.5.D. 9. For the month the test was conducted, a copy of the logs required by Specific Condition Nos. C.4.C. and C.4.E. Failure to submit this data or the actual operating conditions may invalidate the test. [40 CFR 60.465(b) & Rules 62‑4.070(3) & 62-297.310(8), F.A.C.]I. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department . [Rules 62-297.310(7)(a)9. and 62-297.310(7)(b), F.A.C.]***Comments****: The Thermocouples were Certified on 6/6/2011 by Technical Maintenance Inc. (TMI) (see reports attached). The Thermocouples were tested at 75oC, 100oC and 125oC and found to be within tolerance, i.e. 0.0 % deviation. As explained by Mr. Brian Johnson, Electrical Engineer and Metrologist from TMI, the accurate readings at the 3 temperatures cited above guarantee linearity for the Thermocouples through the entire range for which they were manufactured, such as higher temperatures of 1,500oF and higher per the thermocouple type rating.**The Temperature Chart Recorder was calibrated and the results are attached. However, the AQD has some questions re: that Calibration, as pertains to the temperatures reportedly utilized which are all above 1,000oC. The temperature at which the Incinerator operates within compliance is 771oC. I observed the use of the Fahrenheit Scale on the day of the Calibration. This part of the calibration is still under discussion and needs more feedback from Mr. Brian Johnson, at TMI. TMI reported that the Chart Linearity “Passed” “As Found” at !0%,40%, 60% and 90% with deviations of* ***+****0.1 Division, “As Found” (no adjustments) for each percentage mentioned previously where the Tolerance is* ***±*** *0.2 Divisions.* *I called Brian Johnson on 7/13/2011 to obtain clarification on the Temperature Chart Recorder Report which stated that the Celsius Scale had been used to calibrate it at 1,000; 1,200; 1,400; and 1,500oC. On the day of the test, I observed the use of the Fahrenheit Scale at those numbers. Mr. Johnson agreed that the scale used was Fahrenheit and he committed to re-submitting page 2 of 2 for Certificate of Calibration A928285 with a cover letter explaining the errata on or before 7/15/2011.****Compliance Status Update of 8/24/2011.*** *The April 2009 to April 2011 “temperature charts” provided by One Source Coil Coaters lacked the information required to demonstrate compliance with continuous temperature recording while operating the Incinerator. One Source Coil Coaters also failed to record the Incinerator Temperature on an hourly basis.* C.6. If any physical or operational change, change in the method of operation, or addition is made to Line Nos. 1 or 2, the applicant shall notify the Air Permitting Section of this office and the PCDEM of the change, postmarked 60 days or as soon as practicable before the change is commenced. The Department shall require the applicant to conduct a new capture efficiency test if the Department has reason to believe (based on engineering calculations or empirical evidence) that a physical or operational change made to the capture system has decreased the overall emissions overall destruction efficiency of the system. [40 CFR 60.7 & Rules 62-210.300 & 297.450(4)(c), F.A.C.]***Comments****: There were no changes or additions of equipment, materials or processes per Mr. Sastri nor any that I could see.*A.1. New Source Performance Standards (NSPS): Coating Line No. 1 is subject to the standards of performance of 40 CFR 60 Subpart TT- *Standards of Performance for Metal Coil Surface Coating* and the general provisions of 40 CFR 60 Subpart A, where applicable, in Attachments A and B.[Rule 62-204.800(8), F.A.C.]***Comments****: See specific comments for compliance with this subpart below.*ATTACHMENT ASubpart TT-Standards of Performance for Metal Coil Surface Coating**§  60.462**  **Standards for volatile organic compounds.**  (a) On and after the date on which §  60.8 requires a performance test to be completed, each owner or operator subject to this subpart shall not cause to be discharged into the atmosphere more than: (1) 0.28 kilogram VOC per liter (kg VOC/*l*) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s); or (2) 0.14 kg VOC/*l* of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or (3) 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or (4) A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/*l* of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency. ***Comments****: The facility was in compliance each and every month of the year with emission which were always less than 0 .14Kg VOC/l of coating solids as verified quarterly by this inspector and with the Overall Destruction Efficiency of 97.57 % achieved during the last stack test in 2010.***§  60.463**  **Performance test and compliance provisions.**  (a) Section 60.8(d) and (f) do not apply to the performance test.  (b) The owner or operator of an affected facility shall conduct an initial performance test as required under §  60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in this section.  (c) The owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/*l* of coating solids applied. (1) An owner or operator shall use the following procedures for each affected facility that does not use a capture system and control device to comply with the emission limit specified under §  60.462(a)(1). The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Administrator. (i) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for each affected facility, except as provided under paragraph (c)(1)(iv) of this section. The weighted average of the total mass of VOC's used per unit volume of coating solids applied each calendar month is determined by the following procedures. (A) Calculate the mass of VOC's used (Mo+Md) during each calendar month for each affected facility by the following equation:  (ΣLdjDdj will be 0 if no VOC solvent is added to the coatings, as received) where n is the number of different coatings used during the calendar month, and m is the number of different VOC solvents added to coatings used during the calendar month. (B) Calculate the total volume of coating solids used (Ls) in each calendar month for each affected facility by the following equation: Where: n is the number of different coatings used during the calendar month.  (C) Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:  (ii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the calendar month for each affected facility by the following equation:  (iii) Where the volume-weighted average mass of VOC's discharged to the atmosphere per unit volume of coating solids applied (N) is equal to or less than 0.28 kg/*l*, the affected facility is in compliance. (iv) If each individual coating used by an affected facility has a VOC content, as received, that is equal to or less than 0.28 kg/*l* of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application. (2) An owner or operator shall use the following procedures for each affected facility that continuously uses a capture system and a control device that destroys VOC's (e.g., incinerator) to comply with the emission limit specified under §  60.462(a) (2) or (3). (i) Determine the overall reduction efficiency (R) for the capture system and control device. For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (c)(2)(i) (A), (B), and (C) of this section. In subsequent months, the owner or operator may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c)(2)(i) (A), (B), and (C) of this section, shall be repeated when directed by the Administrator or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test. (A) Determine the fraction (F) of total VOC's emitted by an affected facility that enters the control device using the following equation: Equation 5 Where: *l* is the number of gas streams entering the control device, and p is the number of gas streams emitted directly to the atmosphere. (B) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation: Equation 6 Where: n is the number of gas streams entering the control device, and m is the number of gas streams leaving the control device and entering the atmosphere. The owner or operator of the affected facility shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in §  60.466. The owner or operator of the affected facility shall construct a temporary enclosure around the coating applicator and flashoff area during the performance test for the purpose of evaluating the capture efficiency of the system. The enclosure must be maintained at a negative pressure to ensure that all VOC emissions are measurable. If a permanent enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is adequately containing VOC emissions, no additional enclosure is required for the performance test. (C) Determine overall reduction efficiency (R) using the following equation: If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as follows. (ii) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (A), (B), and (C) of this section. (iii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation: (iv) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/*l* of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test. (3) An owner or operator shall use the following procedure for each affected facility that uses a control device that recovers the VOC's (e.g., carbon adsorber) to comply with the applicable emission limit specified under §  60.462(a) (2) or (3). (i) Calculate the total mass of VOC's consumed (Mo+Md) during each calendar month for each affected facility using equation (1). (ii) Calculate the total mass of VOC's recovered (Mr) during each calendar month using the following equation: (iii) Calculate the overall reduction efficiency of the control device (R) for each calendar month for each affected facility using the following equation: If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) must be computed as follows. (iv) Calculate the total volume of coating solids consumed (Ls) and the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (B) and (C) of this section. (v) Calculate the volume-weighted average mass of VOC's emitted to the atmosphere (N) for each calendar month for each affected facility using equation (8). (vi) If the weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/*l* of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test. (4) An owner or operator shall use the following procedures for each affected facility that intermittently uses a capture system and a control device to comply with the emission limit specified in §  60.462(a)(4). (i) Calculate the total volume of coating solids applied without the control device in operation (Lsn) during each calendar month for each affected facility using the following equation: Where: n is the number of coatings used during the calendar month without the control device in operation. (ii) Calculate the total volume of coating solids applied with the control device in operation (Lsc) during each calendar month for each affected facility using the following equation: Where: n is the number of coatings used during the calendar month with the control device in operation. (iii) Calculate the mass of VOC's used without the control device in operation (Mon+Mdn) during each calendar month for each affected facility using the following equation: Where: n is the number of different coatings used without the control device in operation during the calendar month, and m is the number of different VOC-solvents added to coatings used without the control device in operation during the calendar month. (iv) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied without the control device in operation (Gn) during each calendar month for each affected facility using the following equation: (v) Calculate the mass of VOC's used with the control device in operation (Moc+Mdc) during each calendar month for each affected facility using the following equation: Where: n is the number of different coatings used with the control device in operation during the calendar month, and m is the number of different VOC-solvents added to coatings used with the control device in operation during the calendar month. (vi) Calculate the volume-weighted average of the total mass of VOC's used per unit volume of coating solids applied with the control device in operation (Gc) during each calendar month for each affected facility using the following equation:  (vii) Determine the overall reduction efficiency (R) for the capture system and control device using the procedures in paragraphs (c)(2)(i) (A), (B), and (C) or paragraphs (c)(3) (i), (ii), and (iii) of this section, whichever is applicable. (viii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month for each affected facility using the following equation: Equation    17 (ix) Calculate the emission limit(s) for each calendar month for each affected facility using the following equation:        or whichever is greater. (x) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to the calculated emission limit (S) for the calendar month, the affected facility is in compliance. Each monthly calculation is a performance test. ***Comments****: The facility was in compliance each and every month of the year with emission which were always less than 0 .14Kg VOC/l of coating solids as verified quarterly by this inspector and with the Overall Destruction Efficiency of 97.57 % achieved during the last stack test in 2010.***§  60.464**  **Monitoring of emissions and operations.** (a) Where compliance with the numerical limit specified in §  60.462(a) (1) or (2) is achieved through the use of low VOC-content coatings without the use of emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, the owner or operator shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in §  60.463. (b) Where compliance with the limit specified in §  60.462(a)(4) is achieved through the intermittent use of emission control devices, the owner or operator shall compute and record for each affected facility the average VOC content of coatings applied during each calendar month according to the equations provided in §  60.463. (c) If thermal incineration is used, each owner or operator subject to the provisions of this subpart shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with §  60.462(a)(2), (3), or (4). This device shall have an accuracy of ±2.5 °C. or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 °C (50 °F) below the temperature at which compliance with §  60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §  60.8. The records required by §  60.7 shall identify each such occurrence and its duration. If catalytic incineration is used, the owner or operator shall install, calibrate, operate, and maintain a device to monitor and record continuously the gas temperature both upstream and downstream of the incinerator catalyst bed. This device shall have an accuracy of ±2.5 °C. or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. During coating operations, the owner or operator shall record all periods in excess of 3 hours where the average difference between the temperature upstream and downstream of the incinerator catalyst bed remains below 80 percent of the temperature difference at which compliance was demonstrated during the most recent measurement of incinerator efficiency or when the inlet temperature falls more than 28 °C (50 °F) below the temperature at which compliance with §  60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §  60.8. The records required by §  60.7 shall identify each such occurrence and its duration. ***Comments****: One Source Coil Coaters uses a Thermal Incinerator to “control” VOC emissions. The facility performed a calibration of the Temperature Chart Recorder and Certifications of the Thermocouples on 6/6 & 7/2011 to the effect that their readings are true and accurate per Brian Johnson of TM Inc. The Thermocouples had 0****.****0% deviations from the standards tested****.*** *The Temperature Chart Recorder was tested and did not need a calibration i.e. it did not require adjustments to its readings, also per Mr. Johnson. However, there are some lingering question to be resolved by phone call (planned for 7/13/2011) re: the temperatures at which the Chart Recorder was tested which appear to be higher than those at which the Incinerator operates.* *I called Brian Johnson on 7/13/2011 to obtain clarification on the Temperature Chart Recorder Report which stated that the Celsius Scale had been used to calibrate it at 1,000; 1,200; 1,400; and 1,500oC. On the day of the test, I observed the use of the Fahrenheit Scale at those numbers. Mr. Johnson agreed that the scale used was Fahrenheit and he committed to re-submitting page 2 of 2 for Certificate of Calibration A928285 with a cover letter explaining the errata on or before 7/15/2011.***§  60.465**  **Reporting and recordkeeping requirements.** (a) Where compliance with the numerical limit specified in §  60.462(a) (1), (2), or (4) is achieved through the use of low VOC-content coatings without emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, each owner or operator subject to the provisions of this subpart shall include in the initial compliance report required by §  60.8 the weighted average of the VOC content of coatings used during a period of one calendar month for each affected facility. Where compliance with §  60.462(a)(4) is achieved through the intermittent use of a control device, reports shall include separate values of the weighted average VOC content of coatings used with and without the control device in operation.  (b) Where compliance with §  60.462(a)(2), (3), or (4) is achieved through the use of an emission control device that destroys VOC's, each owner or operator subject to the provisions of this subpart shall include the following data in the initial compliance report required by §  60.8: (1) The overall VOC destruction rate used to attain compliance with §  60.462(a)(2), (3), or (4) and the calculated emission limit used to attain compliance with §  60.462(a)(4); and (2) The combustion temperature of the thermal incinerator or the gas temperature, both upstream and downstream of the incinerator catalyst bed, used to attain compliance with §  60.462(a)(2), (3), or (4).  (c) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under §  60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.  (d) The owner or operator of each affected facility shall also submit reports at the frequency specified in §  60.7(c) when the incinerator temperature drops as defined under §  60.464(c). If no such periods occur, the owner or operator shall state this in the report.  (e) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed. ***Comments****: One Source Coil Coaters has recorded and submitted all of the Quarterly Excess Emissions reports required by Sub-Part TT throughout its lifetime. One Source Coil Coaters has performed all VOC, VE and Capture Efficiency testing as required by permit and submitted the results for review in a timely manner. The facility has also submitted the Annual Operating Reports required.* *This year’s O & M Logs are missing an Annual Check required by its own O & M Plan for the Phoenix 6000 Incinerator.* *The Incinerator Temperature Paper Chart Records did not provide enough information to be a useful tool in determining the Incinerator Operating Temperature on any given day, at any given time for the past 12 months, because it lacked time stamps, date stamps, recorder speed stamp and most importantly temperature recorded stamp. i.e. it only provided an ink-pen line circa the middle of the pre-printed 0, 20, 40, 60, 80 and 100 scaled paper. One Source Coil Coaters also did not provide the Thermocouple Certification Data and Temperature Chart Recorder Calibration Data to encompass the last 12 months prior to 6/6/2011 to show compliance with the Certification & Calibration Requirements.***§  60.466**  **Test methods and procedures.**  (a) The reference methods in appendix A to this part, except as provided under §  60.8(b), shall be used to determine compliance with §  60.462 as follows: (1) Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24; (2) Method 25, both for measuring the VOC concentration in each gas stream entering and leaving the control device on each stack equipped with an emission control device and for measuring the VOC concentration in each gas stream emitted directly to the atmosphere; (3) Method 1 for sample and velocity traverses; (4) Method 2 for velocity and volumetric flow rate; (5) Method 3 for gas analysis; and (6) Method 4 for stack gas moisture.  (b) For Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.  (c) For Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.  (d) The Administrator will approve testing of representative stacks on a case-by-case basis if the owner or operator can demonstrate to the satisfaction of the Administrator that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks. ***Comments****: During Testing, the consultant testing teams hired by One Source Coil Coaters have invariably adhered to using the reference methods listed above, as witnessed by me.*ATTACHMENT B**Subpart A-General Provisions for 40 CFR 60****40 CFR 60.7 Notification and record keeping.**  (a) Any owner or operator subject to the provisions of this part shall furnish the Administrator written notification or, if acceptable to both the Administrator and the owner or operator of a source, electronic notification, as follows: 1. A notification of the date construction (or reconstruction as defined under § 60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.  3. A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.  4. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in § 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice. 5. A notification of the date upon which demonstration of the continuous monitoring system performance commences in accordance with 40 CFR 60.13(c). Notification shall be postmarked not less than 30 days prior to such date. 6. A notification of the anticipated date for conducting the opacity observations required by 40 CFR 60.11(e)(1) of this part. The notification shall also include, if appropriate, a request for the Administrator to provide a visible emissions reader during a performance test. The notification shall be postmarked not less than 30 days prior to such date. 7. A notification that continuous opacity monitoring system data results will be used to determine compliance with the applicable opacity standard during a performance test required by 40 CFR 60.8 in lieu of Method 9 observation data as allowed by 40 CFR 60.11(e)(5) of 40 CFR 60. This notification shall be postmarked not less than 30 days prior to the date of the performance test. (b) Any owner or operator subject to the provisions of this part shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. (c) Each owner or operator required to install a continuous monitoring system (CMS) or monitoring device shall submit an excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and/or a summary report form (see paragraph (d) of this section) to the Administrator semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period. Written reports of excess emissions shall include the following information: (1) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period. (2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.  (3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.  (4) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.  (d) The summary report form shall contain the information and be in the format shown in Figure 1 unless otherwise specified by the Administrator. One summary report form shall be submitted for each pollutant monitored at each affected facility. (1) If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report form shall be submitted and the excess emission report described in 40 CFR 60.7(c) need not be submitted unless requested by the Administrator. (2) If the total duration of excess emissions for the reporting period is 1 percent or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, the summary report form and the excess emission report described in 40 CFR 60.7(c) shall both be submitted. (e) (1) Notwithstanding the frequency of reporting requirements specified in paragraph (c) of this section, an owner or operator who is required by an applicable subpart to submit excess emissions and monitoring systems performance reports (and summary reports) on a quarterly (or more frequent) basis may reduce the frequency of reporting for that standard to semiannual if thefollowing conditions are met:(i) For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods) the affected facility’s excess emissions and monitoring systems reports submitted to comply with a standard under this part continually demonstrate that the facility is in compliance with the applicable standard;(ii) The owner or operator continues to comply with all recordkeeping andmonitoring requirements specified in this subpart and the applicable standard; and(iii) The Administrator does not object to a reduced frequency of reportingfor the affected facility, as provided in paragraph (e)(2) of this section.(2) The frequency of reporting of excess emissions and monitoring systems performance (and summary) reports may be reduced only after the owner or operator notifies the Administrator in writing of his or her intention to make such a change and the Administrator does not object to the intended change. In deciding whether to approve a reduced frequency of reporting, the Administrator may review information concerning the source’s entire previous performance history during the required recordkeeping period prior to the intended change, including performance test results, monitoring data, and evaluations of an owner or operator’s conformance with operation and maintenance requirements. Such information may be used by the Administrator to make a judgment about the source’s potential for noncompliance in the future. If the Administrator disapproves the owner or operator’s request to reduce the frequency of reporting, the Administrator will notify the owner or operator in writing within 45 days after receiving notice of the owner or operator’s intention. The notification from the Administrator to the owner or operator will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.(3) As soon as monitoring data indicate that the affected facility is not in compliance with any emission limitation or operating parameter specified in the applicable standard, the frequency of reporting shall revert to the frequency specified in the applicable standard, and the owner or operator shall submit an excess emissions and monitoring systems performance re-port(and summary report, if required) at the next appropriate reporting period following the noncomplying event. After demonstrating compliance with the applicable standard for another full year, the owner or operator may again request approval from the Administrator to reduce the frequency of reporting for that standard as provided for in paragraphs (e)(1) and (e)(2) of thissection. (f) Any owner or operator subject to the provisions of this part shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records, except as follows: (1) This paragraph applies to owners or operators required to install a continuous emissions monitoring system (CEMS) where the CEMS installed is automated, and where the calculated data averages do not exclude periods of CEMS breakdown or malfunction. An automated CEMS records and reduces the measured data to the form of the pollutant emission standard through the use of a computerized data acquisition system. In lieu of maintaining a file of all CEMS subhourly measurements as required under paragraph (f) of this section, the owner or operator shall retain the most recent consecutive three averaging periods of subhourly measurements and a file that contains a hard copy of the data acquisition system algorithm used to reduce the measured data into the reportable form of the standard. (2) This paragraph applies to owners or operators required to install a CEMS where the measured data is manually reduced to obtain the reportable form of the standard, and where the calculated data averages do not exclude periods of CEMS breakdown or malfunction. In lieu of maintaining a file of all CEMS subhourly measurements as required under paragraph (f) of this section, the owner or operator shall retain all subhourly measurements for the most recent reporting period. The subhourly measurements shall be retained for 120 days from the date of the most recent summary or excess emission report submitted to the Administrator. (3) The Administrator or delegated authority, upon notification to the source, may require the owner or operator to maintain all measurements as required by paragraph (f) of this section, if the Administrator or the delegated authority determines these records are required to more accurately assess the compliance status of the affected source.  (g) If notification substantially similar to that in 40 CFR 60.7(a) is required by any other State or local agency, sending the Administrator a copy of that notification will satisfy the requirements of 40 CFR 60.7(a).(h) Individual subparts of this part may include specific provisions which clarify or make inapplicable the provisions set forth in this section.[40 CFR 60.7(a), (b), (c), (d), (e), (f), (g), (h)]***Comments****: One Source Coil Coaters was in compliance with items (a), (b), (c), (d), (e), (f) and (g) above.***40 CFR 60.8 Performance tests.**  (c) Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard. [40 CFR 60.8(c)]. (d) The owner or operator of an affected facility shall provide the Administrator at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the Administrator the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems , etc) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify the administrator (or delegated State or local agency) as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Administrator (or delegated State or local agency) by mutual agreement. (e) The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows: (1) Sampling ports adequate for test methods applicable to such facility. This includes (i) constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and (ii) providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures. (2) Safe sampling platform(s).  (3) Safe access to sampling platform(s).  (4) Utilities for sampling and testing equipment. [40 CFR 60.8(e)]. (f) Unless otherwise specified in the applicable subpart, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Administrator's approval, be determined using the arithmetic mean of the results of the two other runs.[40 CFR 60.8(f)]. ***Comments****: Sampling Ports, Testing Platform, Equipment, Processes, Test Methods Used and Results have met the requirements in this permit condition and have, invariably and where applicable, been submitted for review as required.***§ 60.9 Availability of information.**The availability to the public of information provided to, or otherwise obtained by, the Administrator under this part shall be governed by part 2 of this chapter. (Information submitted voluntarily to the Administrator for the purposes of §§ 60.5 and 60.6 is governed by §§ 2.201 through 2.213 of this chapter and not by § 2.301 of this chapter.)***Comments****: No comment required.***40 CFR 60.13 Monitoring requirements.** (a) For the purposes of this section, all continuous monitoring systems required under applicable subparts shall be subject to the provisions of this section upon promulgation of performance specifications for continuous monitoring systems under appendix B of 40 CFR 60 and, if the continuous monitoring system is used to demonstrate compliance with emission limits on a continuous basis, appendix F to 40 CFR 60, unless otherwise specified in an applicable subpart or by the Administrator. Appendix F is applicable December 4, 1987. (b) All continuous monitoring systems and monitoring devices shall be installed and operational prior to conducting performance tests under 40 CFR 60.8. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device. (c) If the owner or operator of an affected facility elects to submit continuos opacity monitoring system (COMS) data for compliance with the opacity standard as provided under 40 CFR 60.11(e)(5), he/she shall conduct a performance evaluation of the COMS as specified in Performance Specification 1, appendix B, of 40 CFR 60 before the performance test required under 40 CFR 60.8 is conducted. Otherwise, the owner or operator of an affected facility shall conduct a performance evaluation of the COMS or continuous emission monitoring system (CEMS) during any performance test required under 40 CFR 60.8 or within 30 days thereafter in accordance with the applicable performance specification in appendix B of 40 CFR 60. The owner or operator of an affected facility shall conduct COMS or CEMS performance evaluations at such other times as may be required by the Administrator under section 114 of the Act.  (1) The owner or operator of an affected facility using a COMS to determine opacity compliance during any performance test required under 40 CFR 60.8 and as described in 40 CFR 60.11(e)(5), shall furnish the Administrator two or, upon request, more copies of a written report of the results of the COMS performance evaluation described in 40 CFR 60.13(c) at least 10 days before the performance test required under 40 CFR 60.8 is conducted. (2) Except as provided in 40 CFR 60.13(c)(1), the owner or operator of an affected facility shall furnish the Administrator within 60 days of completion two or, upon request, more copies of a written report of the results of the performance evaluation. (d) (1) Owners and operators of all continuous emission monitoring systems installed in accordance with the provisions of this part shall check the zero (or low-level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily in accordance with a written procedure. The zero and span shall, as a minimum, be adjusted whenever the 24-hour zero drift or 24-hour span drift exceeds two times the limits of the applicable performance specifications in appendix B. The system must allow the amount of excess zero and span drift measured at the 24-hour interval checks to be recorded and quantified, whenever specified. For a COMS, the optical surfaces, exposed to the effluent gases, must be cleaned before performing the zero and upscale drift adjustments, except for systems using automatic zero adjustments. The optical surfaces must be cleaned when the cumulative automatic zero compensation exceeds 4 percent opacity.  (2) Unless otherwise approved by the Administrator, the following procedures shall be followed for continuous monitoring systems measuring opacity of emissions. Minimum procedures shall include a method for producing a simulated zero opacity condition and an upscale (span) opacity condition using a certified neutral density filter or other related technique to produce a known obscuration of the light beam. Such procedures shall provide a system check of the analyzer internal optical surfaces and all electronic circuitry including the lamp and photo detector assembly. (e) Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under 40 CFR 60.13(d), all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements as follows: (1) All continuous monitoring systems referenced by 40 CFR 60.13(c) for measuring opacity of emissions shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period. (2) All continuous monitoring systems referenced by 40 CFR 60.13(c) for measuring emissions, except opacity, shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. (f) All continuous monitoring systems or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. Additional procedures for location of continuous monitoring systems contained in the applicable Performance Specifications of appendix B of 40 CFR 60 shall be used. 1. (1) When more than one continuous monitoring system is used to measure the emissions from only one affected facility (e.g. multiple breechings, multiple outlets), the owner or operator shall report the results as required from each continuous monitoring system. When the effluent from one affected facility is released to the atmosphere through more than one point, the owner or operator shall install an applicable continuous monitoring system on each separate effluent unless installation of fewer systems is approved by the Administrator.

(2) When the effluents from two or more affected facilities subject to the same opacity standard are combined before being released to the atmosphere, the owner or operator may either install a continuous opacity monitoring system at a location monitoring the combined effluent or install an opacity combiner system comprised of opacity and flow monitoring systems on each stream, and shall report as per Sec. 60.7(c) on the combined effluent. When the affected facilities are not subject to the same opacity standard applicable, except for documented periods of shutdown of the affected facility, subject to the most stringent opacity standard shall apply(3) When the effluents from two or more affected facilities subject to the same emissions standard, other than opacity, are combined before released to the atmosphere, the owner or operator may install applicable continuous monitoring systems on each effluent or on the combined effluent. When the affected facilities are not subject to the continuous monitoring standard, separate continuous monitoring systems shall be installed on each effluent and the owner or operator shall report as required for each affected facility. (h) Owners or operators of all continuous monitoring systems for measurement of opacity shall reduce all data to 6-minute averages and for continuous monitoring systems other than opacity to 1-hour averages for time periods as defined in 40 CFR 60.2. Six-minute opacity averages shall be calculated from 36 or more data points equally spaced over each 6-minute period. For continuous monitoring systems other than opacity, 1-hour averages shall be computed from four or more data points equally spaced over each 1-hour period. Data recorded during periods of continuous system breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in the data averages computed under this paragraph. For owners or operators complying with the requirements in Sec. 60.7(f)(1) or (2), data averages must include any data recorded during periods of monitor breakdown or malfunction. An arithmetic or integrated average of all data may be used. The data may be recorded in reduced or non reduced form (e.g., ppm pollutant and percent O2 or ng or pollutant per J of heat input). All excess emissions shall be converted into units of the standard using the applicable conversion procedures specified in subparts. After conversion into units of the standard, the data may be rounded to the same number of significant digits as used in the applicable subparts to specify the emission limit (e.g., rounded to the nearest 1 percent opacity).[Rule 62-296.800, F.A.C.; 40 CFR 60.13(h)]. (i) After receipt and consideration of written application, the Administrator may approve alternatives to any monitoring procedures or requirements of this part including, but not limited to the following:  (1) Alternative monitoring requirements when installation of a continuous monitoring system or monitoring device specified by this part would not provide accurate measurements due to liquid water or other interferences caused by substances in the effluent gases.  (2) Alternative monitoring requirements when the affected facility is infrequently operated.  (3) Alternative monitoring requirements to accommodate continuous monitoring systems that require additional measurements to correct for stack moisture conditions.  (4) Alternative locations for installing continuous monitoring systems or monitoring devices when the owner or operator can demonstrate that installation at alternate locations will enable accurate and representative measurements.  (5) Alternative methods of converting pollutant concentration measurements to units of the standards.  (6) Alternative procedures for performing daily checks of zero and span drift that do not involve use of span gases or test cells.  (7) Alternatives to the A.S.T.M. test methods or sampling procedures specified by any subpart.  (8) Alternative continuous monitoring systems that do not meet the design or performance requirements in Performance Specification 1, appendix B, but adequately demonstrate a definite and consistent relationship between its measurements and the measurements of opacity by a system complying with the requirements in Performance Specification 1. The Administrator may require that such demonstration be performed for each affected facility.  (9) Alternative monitoring requirements when the effluent from a single affected facility or the combined effluent from two or more affected facilities is released to the atmosphere through more than one point. [Rule 62-296.800, F.A.C.; 40 CFR 60.13(i)]. (j) An alternative to the relative accuracy (RA) test specified in Performance Specification 2 of appendix B may be requested as follows: (1) An alternative to the reference method tests for determining RA is available for sources with emission rates demonstrated to be less than 50 percent of the applicable standard. A source owner or operator may petition the Administrator to waive the RA test in section 8.4 of Performance Specification 2 and substitute the procedures in section 16.0 if the results of a performance test conducted according to the requirements in 40 CFR 60.8 of this subpart or other tests performed following the criteria in 40 CFR 60.8 demonstrate that the emission rate of the pollutant of interest in the units of the applicable standard is less than 50 percent of the applicable standard. For sources subject to standards expressed as control efficiency levels, a source owner or operator may petition the Administrator to waive the RA test and substitute the procedures in section 16.0 of Performance Specification 2 if the control device exhaust emission rate is less than 50 percent of the level needed to meet the control efficiency requirement. The alternative procedures do not apply if the continuous emission monitoring system is used to determine compliance continuously with the applicable standard. The petition to waive the RA test shall include a detailed description of the procedures to be applied. Included shall be location and procedure for conducting the alternative, the concentration or response levels of the alternative RA materials, and the other equipment checks included in the alternative procedure. The Administrator will review the petition for completeness and applicability. The determination to grant a waiver will depend on the intended use of the CEMS data (e.g., data collection purposes other than NSPS) and may require specifications more stringent than in Performance Specification 2 (e.g., the applicable emission limit is more stringent than NSPS). (2) The waiver of a CEMS RA test will be reviewed and may be rescinded at such time, following successful completion of the alternative RA procedure that the CEMS data indicate the source emissions approaching the level. The criterion for reviewing the waiver is the collection of CEMS data showing that emissions have exceeded 70 percent of the applicable standard for seven, consecutive, averaging periods as specified by the applicable regulation(s). For sources subject to standards expressed as control efficiency levels, the criterion for reviewing the waiver is the collection of CEMS data showing that exhaust emissions have exceeded 70 percent of the level needed to meet the control efficiency requirement for seven, consecutive, averaging periods as specified by the applicable regulation(s) [e.g., 40 CFR 60.45(g)(2) and 40 CFR 60.45(g)(3), 40 CFR 60.73(e), and 40 CFR 60.84(e)]. It is the responsibility of the source operator to maintain records and determine the level of emissions relative to the criterion on the waiver of RA testing. If this criterion is exceeded, the owner or operator must notify the Administrator within 10 days of such occurrence and include a description of the nature and cause of the increasing emissions. The Administrator will review the notification and may rescind the waiver and require the owner or operator to conduct a RA test of the CEMS as specified in section 8.4 of Performance Specification 2.[Rule 62-296.800, F.A.C.; 40 CFR 60.13(j)]. ***Comments****: This EU is not required to have a CEMS or COMS and does not have any. The temperature is monitored continuously (CMS) as assurance that, together with 100% Capture Efficiency, the Overall Destruction Efficiency of VOCS will be ≥ 90% and that CO emissions will be kept under 100 tons/year, as demonstrated by the stack test results, when maintained properly and if operated at or above the stack test temperature of 1,410oF.***40 CFR 60.14 Modification.**  (a) Except as provided under 40 CFR 60.14(e) and 40 CFR 60.14(f), any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification within the meaning of section 111 of the Act. Upon modification, an existing facility shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere. [Rule 62-296.800, F.A.C.; 40 CFR 60.14(a)].  (b) Emission rate shall be expressed as kg/hr (lbs./hour) of any pollutant discharged into the atmosphere for which a standard is applicable. The Administrator shall use the following to determine emission rate:  (1) Emission factors as specified in the latest issue of "Compilation of Air Pollutant Emission Factors", EPA Publication No. AP-42, or other emission factors determined by the Administrator to be superior to AP-42 emission factors, in cases where utilization of emission factors demonstrates that the emission level resulting from the physical or operational change will either clearly increase or clearly not increase.  (2) Material balances, continuous monitor data, or manual emission tests in cases where utilization of emission factors as referenced in 40 CFR 60.14(b)(1) does not demonstrate to the Administrator's satisfaction whether the emission level resulting from the physical or operational change will either clearly increase or clearly not increase, or where an owner or operator demonstrates to the Administrator's satisfaction that there are reasonable grounds to dispute the result obtained by the Administrator utilizing emission factors as referenced in 40 CFR 60.14(b)(1) . When the emission rate is based on results from manual emission tests or continuous monitoring systems, the procedures specified in 40 CFR 60 appendix C of 40 CFR 60 shall be used to determine whether an increase in emission rate has occurred. Tests shall be conducted under such conditions as the Administrator shall specify to the owner or operator based on representative performance of the facility. At least three valid test runs must be conducted before and at least three after the physical or operational change. All operating parameters which may affect emissions must be held constant to the maximum feasible degree for all test runs.[Rule 62-296.800, F.A.C.; 40 CFR 60.14(b)]. (c) The addition of an affected facility to a stationary source as an expansion to that source or as a replacement for an existing facility shall not by itself bring within the applicability of this part any other facility within that source. [Rule 62-296.800, F.A.C.; 40 CFR 60.14(c)]. (e) The following shall not, by themselves, be considered modifications under this part:  (1) Maintenance, repair, and replacement which the Administrator determines to be routine for a source category, subject to the provisions of 40 CFR 60.14(c) and 40 CFR 60.15.  (2) An increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure on that facility.  (3) An increase in the hours of operation.  (4) Use of an alternative fuel or raw material if, prior to the date any standard under this part becomes applicable to that source type, as provided by 40 CFR 60.1, the existing facility was designed to accommodate that alternative use. A facility shall be considered to be designed to accommodate an alternative fuel or raw material if that use could be accomplished under the facility's construction specifications as amended prior to the change. Conversion to coal required for energy considerations, as specified in section 111(a)(8) of the Act, shall not be considered a modification.  (5) The addition or use of any system or device whose primary function is the reduction of air pollutants, except when an emission control system is removed or is replaced by a system which the Administrator determines to be less environmentally beneficial.  (6) The relocation or change in ownership of an existing facility.  [Rule 62-296.800, F.A.C.; 40 CFR 60.14(e)]. (f) Special provisions set forth under an applicable subpart of this part shall supersede any conflicting provisions of this section. [Rule 62-296.800, F.A.C.; 40 CFR 60.14(f)]. (g) Within 180 days of the completion of any physical or operational change subject to the control measures specified in 40 CFR 60.14(a), compliance with all applicable standards must be achieved.  [Rule 62-296.800, F.A.C.; 40 CFR 60.14(g)]. (h) No physical change, or change in the method of operation, at an existing electric utility steam generating unit shall be treated as a modification for the purposes of this section provided that such change does not increase the maximum hourly emissions of any pollutant regulated under this section above the maximum hourly emissions achievable at that unit during the 5 years prior to the change. (i) Repowering projects that are awarded funding from the Department of Energy as permanent clean coal technology demonstration projects (or similar projects funded by EPA) are exempt from the requirements of this section provided that such change does not increase the maximum hourly emissions of any pollutant regulated under this section above the maximum hourly emissions achievable at that unit during the five years prior to the change. (j) (1) Repowering projects that qualify for an extension under section 409(b) of the Clean Air Act are exempt from the requirements of this section, provided that such change does not increase the actual hourly emissions of any pollutant regulated under this section above the actual hourly emissions achievable at that unit during the 5 years prior to the change.(2) This exemption shall not apply to any new unit that:(i) Is designated as a replacement for an existing unit;(ii) Qualifies under section 409(b) of the Clean Air Act for an extension of an emission limitation compliance date under section 405 of the Clean Air Act; and(iii) Is located at a different site than the existing unit. (k) The installation, operation, cessation, or removal of a temporary clean coal technology demonstration project is exempt from the requirements of this section. A *temporary clean coal control technology demonstration projec*t, for the purposes of this section is a clean coal technology demonstration project that is operated for a period of 5 years or less, and which complies with the State implementation plan for the State in which the project is located and other requirements necessary to attain and maintain the national ambient air quality standards during the project and after it is terminated. (l) The reactivation of a very clean coal-fired electric utility steam generating unit is exempt from the requirements of this section.**40 CFR 60.15 Reconstruction.**  (a) An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate. [Rule 62-296.800, F.A.C.; 40 CFR 60.15(a)]. (d) If an owner or operator of an existing facility proposes to replace components, and the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, he shall notify the Administrator of the proposed replacements. The notice must be postmarked 60 days (or as soon as practicable) before construction of the replacements is commenced and must include the following information:  (1) Name and address of the owner or operator.  (2) The location of the existing facility.  (3) A brief description of the existing facility and the components which are to be replaced.  (4) A description of the existing air pollution control equipment and the proposed air pollution control equipment.  (5) An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new facility.  (6) The estimated life of the existing facility after the replacements.  (7) A discussion of any economic or technical limitations the facility may have in complying with the applicable standards of performance after the proposed replacements. [Rule 62-296.800, F.A.C.; 40 CFR 60.15(d)]. (e) The Administrator will determine, within 30 days of the receipt of the notice required by 40 CFR 60.15(d) and any additional information he may reasonably require, whether the proposed replacement constitutes reconstruction. [Rule 62-296.800, F.A.C.; 40 CFR 60.15(e)]. (f) The Administrator's determination under 40 CFR 60.15(e) shall be based on:  (1) The fixed capital cost of the replacements in comparison to the fixed capital cost that would be required to construct a comparable entirely new facility;  (2) The estimated life of the facility after the replacements compared to the life of a comparable entirely new facility;  (3) The extent to which the components being replaced cause or contribute to the emissions from the facility; and  (4) Any economic or technical limitations on compliance with applicable standards of performance which are inherent in the proposed replacements. [Rule 62-296.800, F.A.C.; 40 CFR 60.15(f)]. (g) Individual subparts of this part may include specific provisions which refine and delimit the concept of reconstruction set forth in this section. ***Comments****: There were no changes or additions of equipment, materials or processes per Mr. Sastri nor any that I could see.* [Rule 62-296.800, F.A.C.; 40 CFR 60.15(g)]. |
|  |  |  | Valid Permit [Rule 62-210.300] |
|  |  |  | Changes to Facility/emission unit [Rule 62-210.300] *Does the emission unit description above match what the facility is operating (Number of emission units or points. [x]  Yes [ ]  No* **C**omments: *No further comment.* |
| ✓ | **C. Other:** |
| **Pollution Prevention Activities*** P2 Handouts Provided: [x]  P2 Brochure; [ ]  P2 Manual; [ ]  P2 Checklist
* Have any emissions reductions occurred [ ]  *Yes /* [x]  *No*

[ ]  Chemical Substitution; [ ]  Equipment Changes; [ ]  Process Changes[ ]  Chemical/Material Reuse; [ ] On-site Recycling; [ ]  Other: ***Comments:*** *According to Mr. Sastri, Production is holding steady at the same levels as last year with some modest increases.* |
| Closing Conference: *I informed Mr. Sastri that the temperature Chart Recordings were lacking data which in my opinion were needed to make them useful for determining compliance with the incinerator operating temperature throughout the past 12 months, at least. I informed Mr. Sastri that this could be construed to be a violation of the relevant permit condition.**The Temperature Chart Recorder Calibration records also appeared to be incomplete and the* *completed records requested were not submitted after being requested in phone conversations and several* *emails. I informed Mr. Sastri that this too could be construed to be a violation of the relevant permit* *condition.**The AQD also requested that One Source Coil Coaters submit a schematic of the Incinerator showing the positions of the several Thermocouples that were Calibrated on 6/6 & 7/2011by TMI. As of 7/14/2011 this information has not been received.* *The Compliance status of this EU and facility will be held in abeyance, pending information requests and*  *Reviews.****Compliance Status (no longer in abeyance) Update of 8/24/2011.***The April 2009 to April 2011 “temperature charts” provided by One Source Coil Coaters lacked the information required to demonstrate compliance with continuous temperature recording while operating the Incinerator. One Source Coil Coaters also failed to record the Incinerator Temperature on an hourly basis. The facility has been determined to be in non-compliance for the lack of information required to demonstrate compliance with continuous temperature recording and for failure to log the incinerator temperature on an hourly basis. |
| **Inspector(s)**: Jose Rodriguez, *Pinellas County, Air Quality Division* |
| **Signature(s)**: Date: | **Date: July 14, 2011** |
| ACCESS? | **✓** | EASIIR? | **✓** |