NEIGHBORHOODS DEPARTMENT

Jacksonville
Where Florida Begins.

Permittee:
TTX Company - Acorn Division
1450 West Church Street
Jacksonville, FL 32204-1306

Permit Number: 0310297-007-AO
Facility ID Number: 0310297
SIC Number: 3743
Project: Railcar/Boxcar Spray Painting Operation

This permit authorizes the operation of a railcar/boxcar spray painting business. The facility is located in Duval County at 1450 West Church Street, Jacksonville, FL 32204-1306. The facility's Universal Transverse Mercator (UTM) coordinates are Zone 17, 435.10 km East and 3355.70 km North. The facility's latitude and longitude coordinates are 30°19'59" North and 81°40'45" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), Chapters 62-4, 62-204, 62-210, 62-296, and 62-297, Florida Administrative Code (F.A.C.), and applicable Rules of the Jacksonville Environmental Protection Board (JEPB). The permittee is authorized to perform the work and operate the facility as described in the permit application, approved drawings, plans, and other documents, attached hereto or on file with the City of Jacksonville, Neighborhoods Department, Environmental Quality Division (Permitting Authority) and in accordance with the terms and conditions of this permit.

Operation Permit Application Due Date: **March 31, 2017**
Expiration Date: **May 31, 2017**

Neighborhoods Department
Environmental Quality Division

Robert Steven Pace, P.E., Manager
Air Quality Branch

RSP/CBJ

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Section I. Facility Information

Subsection A. Facility/Project Description

This project is for the operation of a railcar/boxcar spray painting operation. Railcars are painted in a building that is approximately 250 feet long. Particulate Matter (PM) from the railcar painting building is controlled with a dry filter prior to discharge to the atmosphere. The interior of boxcars are also painted at the facility outside of the railcar building. The boxcar doors are only partially opened during the painting process to allow paint, air supply hoses, and light into the boxcar. The coatings are applied using an airless spray process.

The facility is a synthetic Non-Title V source of air pollution because the operational restrictions assumed by the owner will limit the potential emissions of regulated air pollutants to less than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP) to less than 10 tons per year for a single HAP and less than 25 tons per year for total HAPs pursuant to Rule 62-210.200, F.A.C., and Rule 2.301, JEPB.

Subsection B. Summary of Emission Unit (EU) ID Numbers and Brief Descriptions

EU No.	EU Description	Control Device
001	Railcar/Boxcar Spray Painting Operation	Slit & Expanded Kraft Paper Filter only in the railcar painting building

Subsection C. Relevant documents

Permit Number: 0310297-006-AO
Air operation permit application received May 3, 2012

Section II. Facility Wide Conditions

Subsection A. General Conditions

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Permitting Authority will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Permitting Authority.

3. As provided in subsections 403.987(6) and 403.722(5), F.S, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Permitting Authority permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and rules, unless specifically authorized by an order from the Permitting Authority.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Permitting Authority rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Permitting Authority rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Permitting Authority personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
   a. Have access to and copy any records that must be kept under conditions of the permit;
   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Permitting Authority rules.

   Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Permitting Authority with the following information:
   a. A description of and cause of noncompliance; and
   b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Permitting Authority for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Permitting Authority may be used by the Permitting Authority as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Permitting Authority rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Permitting Authority rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Permitting Authority rules.

11. This permit is transferable only upon Permitting Authority approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Permitting Authority.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:
    ( ) Determination of Best Available Control Technology (BACT)
    ( ) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:
    a. Upon request, the permittee shall furnish all records and plans required under Permitting Authority rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Permitting Authority.
    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Permitting Authority rule.
    c. Records of monitoring information shall include:
        i. The date, exact place, and time of sampling or measurements;
        ii. The person responsible for performing the sampling or measurements;
        iii. The dates analyses were performed;
        iv. The person responsible for performing the analyses;
        v. The analytical techniques or methods used;
        vi. The results of such analyses.

15. When requested by the Permitting Authority, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Permitting Authority, such facts or information shall be corrected promptly.
    [Rule 62-4.160, F.A.C., and Rule 2.1401, JEPB]

Subsection B. Specific Conditions

1. The permittee shall apply to the Permitting Authority for a desired modification to an air permit or application, accompanied by the proper processing fee, and receive the approval of the Permitting Authority prior to implementation of the modification.
   [Rule 62-4.080(2), F.A.C., and Rule 2.1401, JEPB]

2. The permittee shall submit an "Application for Non-Title V Air Permit Renewal" (DEP Form 62-210.900(4)) to the Permitting Authority no later than sixty (60) days before the expiration of this operation permit.
   [Rule 62-4.090, F.A.C., and Rule 2.1401, JEPB]

3. The permittee shall submit an "Annual Operating Report for Air Pollutant Emitting Facility" (DEP Form No. 62-210.900(5)) to the Permitting Authority each year. The annual operating report shall be submitted to the Permitting Authority no later than April 1st of the following year.
   [Rule 62-210.370(3), F.A.C., and Rule 2.301, JEPB]

4. The permittee shall not cause, let, permit, suffer, or allow the emission of air pollutants which cause or contribute to an objectionable odor.
   [Rule 62-296.320(2), F.A.C., and Rule 2.1101, JEPB]

5. The permittee shall not cause, let, permit, suffer or allow the emission of air pollutants from any activity, the density of which is equal to or greater than 20 percent opacity.
   [Rule 62-296.320(4)(b)1, F.A.C., and Rule 2.1101, JEPB]

6. The permittee shall not cause, let, permit, suffer or allow the emission of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include but are not limited to the following:
   a. Paving and maintenance of roads, parking areas and yards.
   b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
   c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
   d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
   e. Covering of trucks, trailers, front end loaders, and other vehicles or containers to prevent spillage of particulate matter during transport.
   f. Landscaping or planting of vegetation.
   g. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
   h. Confining abrasive blasting where possible.
   i. Enclosure or covering of conveyor systems.

   [Rule 62-296.320(4)(c), F.A.C., and Rule 2.1101, JEPB]

7. Maximum facility wide emissions of volatile organic compounds (VOC) shall be limited to 35.95 tons per year. Maximum facility wide emissions of hazardous air pollutants (HAP) shall be limited to less than 10.0 tons per year for any single HAP and less than 25.0 tons per year for total HAP in order to maintain emissions below the Title V source HAP threshold. All tons per year limits are based on a 12-month rolling total.
   [Applicant's request, Rule 62-210.200(305), F.A.C., and Rule 2.301, JEPB]

8. The permittee shall submit all compliance related notifications and reports required of this permit to:

   Neighborhoods Department
   Environmental Quality Division
   214 North Hogan Street, 7th Floor
   Jacksonville, FL 32202
   Telephone: (904) 255-7100
   Fax: (904) 588-0518

Section III. Emission Units and Conditions

Emission Unit 001- Railcar/Boxcar Spray Painting Operation

Emission Unit Description:	Railcars are painted inside a building with airless spray guns. Boxcar interiors are painted outside the building with the boxcar doors only partially opened during the painting process to allow paint, air supply hoses and light into the boxcar.
Control Device:	Slit & Expanded Kraft Paper Filter only in the railcar painting building

Potential to Emit (PTE)

1. This EU shall be allowed to operate continuously, i.e., 8,760 hours per year.
   [Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

2. Coatings and solvents (as applied) shall be limited to a maximum of 20,540 gallons per year.
[Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

Emission Limitations and Standards

3. This EU is subject to Reasonably Available Control Technology (RACT) requirements including **Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities** [Rule 62-296.500(1 & 2), F.A.C., and Rule 2.1101, JEPB]; and **Surface Coating of Miscellaneous Metal Parts and Products** [Rule 62-296.513, F.A.C., and Rule 2.1101, JEPB].

4. Coatings or solvents shall not be applied in the railcar painting building unless all exhaust air from the painting, surface preparation, or cleaning operation passes through the Kraft paper filter media.
[Rule 62-210.650, F.A.C., and Rule 2.301, JEPB]

5. Coatings (as applied) shall not exceed a maximum of 3.5 pounds of VOC per gallon of coating, excluding water.
[Rule 62-296.513(2)(a)2, F.A.C., and Rule 2.1101, JEPB]

Test Methods and Procedures

6. Testing for demonstration of compliance for VOC shall be performed upon Permitting Authority request, in accordance with EPA Reference Method 24 (as described in 40 CFR 60, Appendix A).
[Rule 62-296.513(4)(a), F.A.C., and Rule 2.1101, JEPB]

7. Coating and solvent manufacturers' data sheets with VOC concentrations may be substituted for VOC testing.
[Rule 62-296.500(2)(b)4, F.A.C., and Rule 2.1101, JEPB]

Recordkeeping and Reporting Requirements

8. Records shall be maintained on a monthly basis for the following:
   a. Gallons of coating(s) applied
   b. VOC content (lbs/gal) of coatings as applied
   c. HAP content (lbs/gal) of coating(s) as applied
   d. Gallons of solvent / thinner usage as dilution agent
   e. Gallons of solvent / thinner usage for cleanup
   f. VOC content (lbs/gal) of solvent / thinner
   g. HAP content (lbs/gal) of solvent / thinner
   h. Number of railcars processed
   i. Number of boxcars processed
   j. Total VOC emissions
   k. Total HAP emissions
   l. Highest single HAP emission

   Records shall be retained for a minimum of two (2) years and made available to the Permitting Authority upon request.
   [Rule 62-296.500(2)(b) and (c), F.A.C., and Rule 2.1101, JEPB]

9. Semi-annual reports shall be submitted to the Permitting Authority describing the usage of solvents, coatings, and VOC/HAP contents and emissions. Each report shall delineate single HAP emissions for each HAP emitted in quantities of 1000 pounds or more for the period and shall total all HAPs emitted for the period. The report for period two shall also provide summary totals for the year for any single HAP previously reported and for total HAPs. Monthly summaries for VOCs, total HAPs, and the highest single HAP shall also be submitted with these reports. The reports shall be due as follows: Period No. 1 (January through June) due on or before September 1, and Period No. 2 (July through December) due on or before March 1.
[Rule 62-4.070(3), F.A.C., and Rule 2.1401, JEPB]