STATEMENT OF BASIS

Canam Steel Corporation
Jacksonville Plant
Facility ID No.: 0310319
Duval County

Title V Air Operation Permit Renewal
DRAFT Permit Project No.: 0310319-014-AV
Renewal of Title V Air Operation Permit No.: 0310319-013-AV

The initial Title V Air Operation Permit No. 0310319-003-AV was effective December 16, 1999. This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (FAC) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This permit is for the purpose of renewing Title V Air Operation Permit No. 0310319-013-AV for the Jacksonville Plant of Canam Steel Corporation.

Canam Steel Corporation is a steel fabrication operation. The steel coating operation consists of a spray coating process, a dip tank coating process consisting of four (4) dip tanks and a vacuum coating process. Emission Unit No. 005 (Dip Tank Coating Process) is the only emission unit currently active at Canam Steel Corporation. Only 2 of the 4 dip tanks are in use at this time. Only water-based paint is used in these dip tanks. The other 2 tanks are in long-term shutdown, however all 4 tanks are considered active for the purposes of this permit renewal. No emissions are emitted from Emission Unit No. 002 (Spray Coating Process) and Emission Unit No. 006 (Vacuum Coating Process) as they are in long-term shutdown status. The permittee wishes to maintain all emission units in this renewal permit.

EU ID No.	Brief Description	
002	Spray Coating Process	Surface coating of fabricated steel. Compliance Assurance Monitoring (CAM) does not apply.
005	Dip Tank Coating Process	Four (4) dip tanks used for the surface coating of fabricated steel trusses. Control equipment: Steel tank covers. CAM does not apply.
006	Vacuum Coating Process	Surface coating of fabricated steel. CAM does not apply.

Canam Steel Corporation is subject to 40 CFR 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, and 40 CFR 63, Subpart A – General Provisions (as described in Appendix B to Subpart MMMM of Part 63 – General Provisions of Applicability to Subpart MMMM).

Additional facility-wide conditions were added to the body of Permit No. 0310319-014-AV. While these facility-wide conditions did not appear in the body of Permit No. 0310319-013-AV, they were already present in Appendix TV-6.

The following specific conditions under Emission Unit Nos. 002, 005 and 006 were removed from Permit No. 0310319-013-AV. They are no longer needed in Renewal Permit No. 0310319-014-AV since initial compliance has been met. See attached documents.

8. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limits in 40 CFR 63.3890 and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to this section. Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in 40 CFR 63.3892 and 63.3893, respectively.
   [40 CFR 63.3941, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

10. The compliance date for this operation shall be January 2, 2007.
    [40 CFR 63.3883(c)(2), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

11. Canam Steel Corporation must complete the initial compliance demonstration according to the requirements in 40 CFR 63.3941 during the initial compliance period. The initial compliance period begins on the date 3 years after the date of January 2, 2004 and ends on the last day of the 12th month following the compliance date.
    [40 CFR 63.3940, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

15. Canam Steel Corporation must submit the notification of compliance status no later than 30 calendar days following the end of the initial compliance period.
    [40 CFR 63.3910, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

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

Canam Steel Corporation is a major source of air pollution because the potential emissions of one or more individual criteria pollutants is greater than 100 tons per year pursuant to Chapter 62-210, FAC, and Rule 2.301, Jacksonville Environmental Protection Board (JEPB).

Based on the Title V Air Operation Permit Renewal application received July 29, 2011, this facility is a major source of hazardous air pollutants (HAPs).