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

Title V Air Operation Permit Renewal
PROPOSED Permit No.: 0310319-014-AV

PERMITTING & COMPLIANCE AUTHORITY:
ENVIRONMENTAL RESOURCE MANAGEMENT DEPARTMENT
ENVIRONMENTAL QUALITY DIVISION
214 NORTH HOGAN STREET, 7TH FLOOR
JACKSONVILLE, FL 32202
TELEPHONE: (904) 255-7100
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Title V Air Operation Permit Renewal

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

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Emission Unit ID No.	**Brief Description**
Emissions Unit - 002	Spray Coating Process
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Permittee:
Canam Steel Corporation
Jacksonville Plant
140 South Ellis Road
Jacksonville, FL 32254

PROPOSED Permit No.: 0310319-014-AV
Facility ID No.: 0310319
SIC Nos.: 34
Project: Title V Air Operation Permit Renewal

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., a steel fabrication operation. This facility is located 140 South Ellis Road, Jacksonville, Duval County, Florida 32254; UTM Coordinates: Zone 17, 427.4 km East and 3353.5 km North; Latitude: 30° 18' 45" North and Longitude: 81° 45' 18" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (FS) and Chapters 62-4, 62-210 and 62-213, Florida Administrative Code (FAC). 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.

Referenced attachments made a part of this permit:

Statement of Basis
Appendix B - Table 2 to Subpart MMMM of Part 63
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix TV-6, Title V Conditions version dated 06/23/06

Effective Date:
Renewal Application Due Date:
Expiration Date:

Environmental and Compliance Department
Environmental Quality Division

_____
Vincent A. Seibold, P.E.
Division Chief

VAS/HDS

Section I. Facility Information.

Subsection A. Facility Description

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.

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).

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

E.U.ID No.	Brief Description
002	Spray Coating Process
005	Dip Tank Coating Process
006	Vacuum Coating Process

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

Subsection C. Relevant Documents.

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

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Appendix LR-1, Local Rule Index

These documents are on file with Permitting Authority:

Title V Air Operation Permit No. 0310319-013-AV
Title V Permit Renewal Application received July 29, 2011

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix TV-6, Title V Conditions, is a part of this permit.
   {Permitting note: Appendix TV-6, Title V Conditions, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

2. General 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) in accordance with Rule 62-296.320(4)(b)1., FAC and Rule 2.1101, JEPB. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, FAC, and Rule 2.1201, JEPB. Testing shall be required upon request of the Permitting Authority.

3. 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 installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Permitting Authority.
   [Rule 62-296.320(1), FAC and Rule 2.1101, JEPB]

4. Excess emissions resulting from startup, shutdown, or malfunction of any emission unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Permitting Authority for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Permitting Authority in accordance with Rule 62-4.130, FAC and Rule 2.1401, JEPB. A full written report on the malfunctions shall be submitted to the Permitting Authority in a quarterly report, if requested by the Permitting Authority.
   [Rule 62-210.700, FAC, and Rule 2.301, JEPB]

5. Permittee shall notify the Permitting Authority fifteen (15) days prior to the date of each formal compliance test conducted for an emission unit.
   [Rule 62-297.310(7)(a)9., FAC, and Rule 2.1201, JEPB]

6. Testing of emissions shall be conducted with the Emissions Unit operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then EU(s) may be tested at less than the maximum permitted capacity; in this case subsequent EU operation is limited to 110 percent of the test load until a new test is conducted. Once the EU is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the authority to operate at the permitted capacity in the permit.
   [Rule 62-297.310(2), FAC, and Rule 2.1201, JEPB]

7. Copies of the test report(s) shall be filed with the Permitting Authority within forty-five (45) days of completion of testing.
   [Rule 62-297.310(8)(b), FAC, and Rule 2.1201, JEPB]

8. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter emissions 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 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 re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
   e. Landscaping or planting of vegetation.
   f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
   g. Confining abrasive blasting where possible.
   h. Enclosure or covering of conveyor systems.

   [Rule 62-296.320(4)(c)1., 2., & 3., FAC and Rule 2.1101, JEPB]

9. Control equipment shall be provided with a method of access that is safe and readily accessible.
   [Rule 62-297.310(6), FAC, and Rule 2.1201, JEPB]

10. <u>Prevention of Accidental Releases (Section 112(r) of CAA)</u>.

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

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

    and,

    b. The permittee shall submit to the Permitting Authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), FAC.

    [40 CFR 68]

11. <u>Annual Operation Report</u>. Permittee shall submit an annual operating report to the Permitting Authority for all emissions units on the forms supplied for each calendar year by April 1 of the following year.
    [Rule 62-210.370(3), F.A.C. and Rule 2.301, JEPB]

12. <u>Permit Renewal</u>. For purposes of a permit renewal, a timely application is one that is submitted 225 days before the expiration of a permit that expires on or after June 1, 2009.
    [Rule 62-213.420(1)(a)2., F.A.C. and Rule 2.501, JEPB]

13. Notification of Startup. The owners or operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the Permitting Authority in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.

    a. The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.
    b. If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Permitting Authority as soon as possible after the date of such startup is ascertained.

    [Rule 62-210.300(5), F.A.C. and Rule 2.301, JEPB]

14. Insignificant Emission Units and/or Activities, Appendix I-1, List of Insignificant Emission Units and/or Activities, is a part of this permit.
    [Rule 62-213.440(1), FAC, Rule 62-213.430(6), FAC, Rule 62-4.040(1)(b), FAC; Rule 2.501, JEPB and Rule 2.1401, JEPB]

15. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-Line Information Center at the following Internet web site: "http://www.dep.state.fl.us/air/emission/tvfee.htm".
    [Rule 62-213.205, FAC and Rule 2.501, JEPB]

16. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
    [Rule 62-213.420(4), FAC and Rule 2.501, JEPB]

17. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., FAC, shall be submitted to the Permitting Authority and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), FAC. {Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of Appendix TV-6, Title V Conditions)}
    [Rules 62-213.440(3) & 62-213.900, FAC and Rule 2.501, JEPB]

18. When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
    [Rule 62-213.440, FAC and Rule 2.501, JEPB]

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

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, GA 30303-8960
Telephone: (404) 562-9155
Fax: (404) 562-9163

20. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. The permittee shall report in accordance with the requirements of Rule 62-210.700(6), FAC, Rule 62-4.130, FAC, Rule 2.301, JEPB, and Rule 2.1401, JEPB, deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), FAC and Rule 2.501, JEPB. Unless otherwise specified in **a permit, rule, or order;** reports shall cover the period of January through June (report due on or before September 1) and July through December (report due on or before March 1).
[Rule 62-213.440(1)(b)3., FAC and Rule 2.501, JEPB]

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

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

The following Facility-wide conditions are not federally enforceable

22. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), FAC and Rule 2.1101, JEPB.]

23. The facility shall be subject to the City of Jacksonville Ordinance Code, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 376 [Odor Control], and JEPB Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice].

24. The facility shall be subject to JEPB Rule 2, Parts I through VII, and Parts IX through XIV.

Section III. Emissions Unit(s) and Conditions

Emission Unit No. 002 – Spray Coating Process

Emission Unit Description: Surface coating of fabricated steel.

Essential Potential to Emit (PTE) Parameters

1. This emissions unit is allowed to operate continuously, i.e., 8,760 hours per year (hrs/yr).
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

2. This emissions unit process shall not exceed 5,000 tons per year (tons/yr) of fabricated steel and 12,000 gallons per year (gal/year) of paint and solvents combined, based on a calendar year basis.
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. Canam Steel Corporation shall comply with the provisions of 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).

4. Coatings (as applied) shall not exceed a maximum of 3.5 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water.
   [Rule 62-296.513(2)(a)2., FAC and Rule 2.1101, JEPB]

5. For an existing affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit as follows:
   a. For each existing general use coating affected source, limit organic HAP emissions to no more than 2.6 pound organic HAP per gallon coating solids used during each 12-month compliance period.
   b. For each existing high performance coating affected source, limit organic HAP emissions to no more than 27.5 pounds organic HAP per gallon coating solids used during each 12-month compliance period.
   c. For each existing magnet wire coating affected source, limit organic HAP emissions to no more than 1.0 pound organic HAP per gallon coating solids used during each 12-month compliance period.
   d. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to no more than 37.7 pounds organic HAP per gallon coating solids used during each 12-month compliance period.
   e. For each existing extreme performance fluoropolymer coating affected source, limit organic HAP emissions to no more than 12.4 pounds organic HAP per gallon coating solids used during each 12-month compliance period.

   [40 CFR 63.3890, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

6. The maximum allowable VOC emissions from this emissions unit shall not exceed 21.00 tons/yr.
   [0310319-007-AC]

Test Methods and Procedures

7. Testing for demonstration of compliance shall be performed in accordance with Environmental Protection Agency (EPA) Reference Method (RM) 24 (as described in 40 CFR 60, Appendix A) for volatile organic compounds. Manufacturers data sheets with VOC and HAP contents may be substituted with the approval of the Permitting Authority.
   [Rule 62-296.513(4), FAC and Rule 2.1101, JEPB]

8. Calculate the organic HAP content, pounds of organic HAP emitted per gallon coating solids used, of each coating used during the compliance period using the following equation:

$$H_C = \frac{(D_C)(W_C)}{V_S}$$

Where:
H_C = Organic HAP content of the coating, pound organic HAP emitted per gallon coating solids used.
D_C = Density of coating, pound coating per gallon coating, determined according to paragraph 40 CFR 63.3941(c).
W_C = Mass fraction of organic HAP in the coating, pound organic HAP per pound coating, determined according to paragraph 40 CFR 63.3941(a).
V_S = Volume fraction of coating solids, gallon coating solids per gallon coating, determined according to according to paragraph 40 CFR 63.3941(b).
[40 CFR 63.3941, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

9. Procedures for demonstration of continuous compliance using the compliant material option shall be in accordance with the requirements in 40 CFR 63.3942.
[40 CFR 63.3942, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Recordkeeping and Reporting Requirements

10. Records shall be maintained monthly for the following:

a. Amount of coating applied
b. VOC content (lbs/gal) of coatings as applied
c. Amount of surface preparation, clean-up and wash-up solvent / thinner usage
d. VOC content of solvent / thinner
e. VOC emissions
f. Hazardous air pollutants (HAP) content of coatings and solvents
g. HAP emissions
h. Ton of steel coated by process

Records shall be maintained for a minimum of five (5) years and made available to the Permitting Authority upon request.
[Rule 62-296.500(2), FAC, Rule 62-213.440(1)(b), FAC, Rule 2.1101, JEPB and Rule 2.501, JEPB]

11. Quarterly reports shall be submitted to the Permitting Authority describing the usage of solvents, coatings, and VOC/HAP contents and emissions. The quarterly reports shall be submitted by the 30th day of the following month after the end of each quarter (January - March, April - June, July - September, and October - December). The final report, which is due by the 30th of January for the quarter of October - December, shall include a synopsis of the preceding year.
[Rule 62-213.440(1)(b), FAC and Rule 2.501, JEPB]

12. Canam Steel Corporation must submit semiannual compliance reports for each affected source as described in 40 CFR 63.3920.
[40 CFR 63.3920, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

13. Canam Steel Corporation must collect and keep records of the data and information specified in 40 CFR 63.3930. Failure to collect and keep these records is a deviation from the applicable standard.
[40 CFR 63.3930, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Emission Unit No. 005 – Dip Tank Coating Process

Emission Unit Description: Four (4) dip tanks used for the surface coating of fabricated steel trusses.

Control Equipment: Steel tank covers

Essential Potential to Emit (PTE) Parameters

1. This emissions unit is allowed to operate continuously, i.e., 8,760 hrs/yr.
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

2. This emissions unit process shall be limited to 50,900 tons/yr of fabricated steel trusses.
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. Canam Steel Corporation shall comply with the provisions of 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).

4. 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., FAC, and Rule 2.1101, JEPB]

5. For an existing affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit as follows:

   a. For each existing general use coating affected source, limit organic HAP emissions to no more than 2.6 pound organic HAP per gallon coating solids used during each 12-month compliance period.
   b. For each existing high performance coating affected source, limit organic HAP emissions to no more than 27.5 pounds organic HAP per gallon coating solids used during each 12-month compliance period.
   c. For each existing magnet wire coating affected source, limit organic HAP emissions to no more than 1.0 pound organic HAP per gallon coating solids used during each 12-month compliance period.
   d. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to no more than 37.7 pounds organic HAP per gallon coating solids used during each 12-month compliance period.
   e. For each existing extreme performance fluoropolymer coating affected source, limit organic HAP emissions to no more than 12.4 pounds organic HAP per gallon coating solids used during each 12-month compliance period.

   [40 CFR 63.3890, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

6. The maximum allowable VOC emissions from this emissions unit shall not exceed 305.40 tons/yr.
   [0310319-007-AC]

Test Methods and Procedures

7. Testing for demonstration of compliance shall be performed in accordance with EPA RM 24 (as described in 40 CFR 60, Appendix A) for volatile organic compounds. Manufacturer's data sheets with VOC and HAP contents may be substituted with the approval of the Permitting Authority.
   [Rule 62-296.513(4), FAC, and Rule 2.1101, JEPB]

8. Calculate the organic HAP content, pounds of organic HAP emitted per gallon coating solids used, of each coating used during the compliance period using the following equation:

$$H_C = \frac{(D_C)(W_C)}{V_S}$$

Where:
H_C = Organic HAP content of the coating, pound organic HAP emitted per gallon coating solids used.
D_C = Density of coating, pound coating per gallon coating, determined according to paragraph 40 CFR 63.3941(c).
W_C = Mass fraction of organic HAP in the coating, pound organic HAP per pound coating, determined according to paragraph 40 CFR 63.3941(a).
V_S = Volume fraction of coating solids, gallon coating solids per gallon coating, determined according to according to paragraph 40 CFR 63.3941(b).
[40 CFR 63.3941, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

9. Procedures for demonstration of continuous compliance using the compliant material option shall be in accordance with the requirements in 40 CFR 63.3942.
[40 CFR 63.3942, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Recordkeeping and Reporting Requirements

10. Records shall be maintained monthly for the following:

a. Amount of coating applied
b. VOC content (lbs/gal) of coatings as applied
c. Amount of surface preparation, clean-up and wash-up solvent / thinner usage
d. VOC content of solvent / thinner
e. VOC emissions
f. Hazardous air pollutants (HAP) content of coatings and solvents
g. HAP emissions
h. Ton of steel coated by process

Records shall be maintained for a minimum of five (5) years and made available to the Permitting Authority upon request.
[Rule 62-296.500(2), FAC, Rule 62-213.440(1)(b), FAC, Rule 2.1101, JEPB and Rule 2.501, JEPB]

11. Quarterly reports shall be submitted to the Permitting Authority describing the usage of solvents, coatings, and VOC/HAP contents and emissions. The quarterly reports shall be submitted by the 30th day of the following month after the end of each quarter (January - March, April - June, July - September, and October - December). The final report, which is due by the 30th of January for the quarter of October - December, shall include a synopsis of the preceding year.
[Rule 62-213.440(1)(b), FAC and Rule 2.501, JEPB]

12. Canam Steel Corporation must submit semiannual compliance reports for each affected source as described in 40 CFR 63.3920.
[40 CFR 63.3920, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

13. Canam Steel Corporation must collect and keep records of the data and information specified in 40 CFR 63.3930. Failure to collect and keep these records is a deviation from the applicable standard.
[40 CFR 63.3930, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Emission Unit No. 006 – Vacuum Coating Process

Emission Unit Description: Surface coating of fabricated steel.

Essential Potential to Emit (PTE) Parameters

1. This emissions unit is allowed to operate continuously, i.e., 8,760 hrs/yr.
   [Rule 62-210.200, FAC(PTE), and Rule 2.301, JEPB]

2. This emissions unit process shall be limited to 20,000 gal/year of paint and solvents combined, based on a calendar year basis.
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. Canam Steel Corporation shall comply with the provisions of 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).

4. 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., FAC, and Rule 2.1101, JEPB]

5. For an existing affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit as follows:

   a. For each existing general use coating affected source, limit organic HAP emissions to no more than 2.6 pound organic HAP per gallon coating solids used during each 12-month compliance period.
   b. For each existing high performance coating affected source, limit organic HAP emissions to no more than 27.5 pounds organic HAP per gallon coating solids used during each 12-month compliance period.
   c. For each existing magnet wire coating affected source, limit organic HAP emissions to no more than 1.0 pound organic HAP per gallon coating solids used during each 12-month compliance period.
   d. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to no more than 37.7 pounds organic HAP per gallon coating solids used during each 12-month compliance period.
   e. For each existing extreme performance fluoropolymer coating affected source, limit organic HAP emissions to no more than 12.4 pounds organic HAP per gallon coating solids used during each 12-month compliance period.

   [40 CFR 63.3890, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

6. The maximum allowable VOC emissions from this emissions unit shall not exceed 19.00 tons/yr.
   [0310319-007-AC]

Test Methods and Procedures

7. Testing for demonstration of compliance shall be performed in accordance with Environmental Protection Agency (EPA) Reference Method (RM) 24 (as described in 40 CFR 60, Appendix A) for volatile organic compounds. Manufacturers data sheets with VOC and HAP contents may be substituted with the approval of the Permitting Authority.
   [Rule 62-296.513(4), FAC, and Rule 2.1101, JEPB]

8. Calculate the organic HAP content, pounds of organic HAP emitted per gallon coating solids used, of each coating used during the compliance period using the following equation:

$$H_C = \frac{(D_C)(W_C)}{V_S}$$

Where:
H_C = Organic HAP content of the coating, pound organic HAP emitted per gallon coating solids used.
D_C = Density of coating, pound coating per gallon coating, determined according to paragraph 40 CFR 63.3941(c).
W_C = Mass fraction of organic HAP in the coating, pound organic HAP per pound coating, determined according to paragraph 40 CFR 63.3941(a).
V_S = Volume fraction of coating solids, gallon coating solids per gallon coating, determined according to according to paragraph 40 CFR 63.3941(b).
[40 CFR 63.3941, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

9 Procedures for demonstration of continuous compliance using the compliant material option shall be in accordance with the requirements in 40 CFR 63.3942.
[40 CFR 63.3942, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Recordkeeping and Reporting Requirements

10. Records shall be maintained monthly for the following:

a. Amount of coating applied
b. VOC content (lbs/gal) of coatings as applied
c. Amount of surface preparation, clean-up and wash-up solvent / thinner usage
d. VOC content of solvent / thinner
e. VOC emissions
f. Hazardous air pollutants (HAP) content of coatings and solvents
g. HAP emissions
h. Ton of steel coated by process

Records shall be maintained for a minimum of five (5) years and made available to the Permitting Authority upon request.
[Rule 62-296.500(2), FAC, Rule 62-213.440(1)(b), FAC, Rule 2.1101, JEPB and Rule 2.501, JEPB]

11. Quarterly reports shall be submitted to the Permitting Authority describing the usage of solvents, coatings, and VOC/HAP contents and emissions. The quarterly reports shall be submitted by the 30th day of the following month after the end of each quarter (January - March, April - June, July - September, and October - December). The final report, which is due by the 30th of January for the quarter of October - December, shall include a synopsis of the preceding year.
[Rule 62-213.440(1)(b), FAC and Rule 2.501, JEPB]

12. Canam Steel Corporation must submit semiannual compliance reports for each affected source as described in 0 CFR 63.3920.
[40 CFR 63.3920, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

13. Canam Steel Corporation must collect and keep records of the data and information specified in 40 CFR 63.3930. Failure to collect and keep these records is a deviation from the applicable standard.
[40 CFR 63.3930, Rule 62-204.800, FAC, and Rule 2.201, JEPB]