Permittee:
M. D. Moody & Sons, Inc.
13911 Atlantic Blvd
Jacksonville, FL 32225-3240

Permit Number: 0310519-004-AF
Facility ID Number: 0310519
SIC Number(s): 3731
Project: Heavy Equipment Repair Facility

This federally enforceable state operation permit (FESOP) is for the operation of a heavy equipment repair facility at the Moody Beaches Yard. This facility is located in Duval County at 13911 Atlantic Blvd., Jacksonville, FL 32225-3240. The Universal Transverse Mercator coordinates of the facility are Zone 17, 457.51 km East and 3354.73 km North. The latitude and longitude coordinates are 30° 19' 25" North and 81° 26' 31" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and 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.

FESOP Renewal Application Due Date: **April 30, 2014**
FESOP Expiration Date: **June 30, 2014**

Neighborhoods Department
Environmental Quality Division

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

RSP/CBJ

Section I. Facility Information

Subsection A. Facility/Project Description

This permit is for the operation of a heavy equipment repair facility at Moody Beaches Yard. This facility performs the repair and refinishing of heavy equipment including cranes, barges, boats, trailer, trucks and miscellaneous appurtenances to these items. Repair and refinishing includes hydro-blasting, abrasive blasting, and repainting (recoating) of these items.

The facility is a synthetic non-Title V source of air pollution because the federally enforceable emission limits assumed by the owner will ensure the potential emissions of regulated air pollutants are less than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP's) are less than 10 tons per year for a single HAP and less than 25 tons per year for total HAP's pursuant to Rule 62-210.200(188), F.A.C., and Rule 2.301, JEPB.

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

EU No.	EU Description	Control Device
001	Heavy Equipment Repair	None

Subsection C. Relevant Documents

Permit Number: 0310519-003-AO
Air operation permit renewal application received May 23, 2013

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 prior to 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 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. 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), F.A.C., and Rule 2.1101, JEPB]

6. 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].

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

8. The permittee shall submit all documents related to applications for permits to construct or operate an emissions unit and all documents related to compliance activities such as reports, tests, and notifications to the Permitting Authority. The Permitting Authority for this project is the City of Jacksonville, Neighborhoods Department, Environmental Quality Division. The Permitting Authority's mailing address is:

Neighborhoods Department
Environmental Quality Division
214 North Hogan Street, 5th Floor
Jacksonville, FL 32202
Telephone: (904) 255-7100
Fax: (904) 588-0518

Section III. Emission Units and Conditions

Emission Unit 001- Heavy Equipment Repair

Emission Unit Description – Repair and refinishing of heavy equipment including cranes, barges, boats, trailers, trucks and miscellaneous appurtenances to these items. Repair and refinishing includes hydro-blasting, abrasive blasting, and repainting (recoating) of these items.

Control Device – None

Essential Potential to Emit (PTE) Parameters

1. This emission unit is permitted to operate continuously, i.e., 8,760 hours per year.
   [Rule 62-210.200(PTE), F.A.C., and Rule 2.301, JEPB]

Emission Limitations and Standards

2. This EU's emission of volatile organic compounds (VOC's) is limited to a maximum of 25 tons per year (TPY) based upon a 12 month rolling total.
   [Applicant's Request, Rule 62-4.070(3), F.A.C., and Rule 2.1401, JEPB]

3. This EU's emission of hazardous air pollutants (HAP's) is limited to a maximum of 9 TPY for a single HAP and a maximum of 22.5 TPY for total HAP's based upon a 12 month rolling total.
   [Applicant's Request, Rule 62-4.070(3), F.A.C., and Rule 2.1401, JEPB]

4. This EU's emission of particulate matter (PM) is limited to a maximum of 45 TPY based upon a 12 month rolling total.
   [Applicant's Request, Rule 62-4.070(3), F.A.C., and Rule 2.1401, JEPB]

5. Best Management Practices (BMP), shall be used to minimize paint (coating) over spray and the BMP shall include, but not be limited to the use of high velocity, low pressure (HVLP) air guns, airless paint guns, brush or roll paint application where practicable, and employee awareness training. Reasonable Assurances to minimize the emissions of fugitive particulate matter shall be:

   a. Reduced speed for vehicular traffic

   b. Use of dust suppressants or wetting agents

   c. Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or wetting prior to sweeping

   d. Covering of trucks, trailers, front end loaders, and other vehicles or containers to prevent spillage of particulate matter during transport

   e. Use of mulch, hydro seeding, grassing, and/or other vegetative ground cover on barren areas to prevent or reduce particulate matter from being wind blown

   f. Use of hoods, fans, filters, and similar equipment to contain, capture, and vent particulate matter

   g. Confining abrasive blasting where possible. Restrict abrasive blasting when the wind speed is greater than 15 miles per hour (one hour average) based upon National Weather Service data and/or predictions. Blasting may be conducted during wind speeds of greater than 15 mph if the blasting is conducted in an enclosed or confined area to substantially reduce the emissions of particulate matter.

   [Rule 62-4.070(3), F.A.C., and Rule 2.1401, JEPB]

Test Methods and Procedures

6. The permittee will determine VOC content of coatings upon Permitting Authority request in accordance with Environmental Protection Agency Reference Method 24 (as described in 40CFR60, Appendix A). Manufacturer's material safety data sheets showing the VOC contents of the coatings may be substituted with the approval of the Permitting Authority.
   [Rule 62-4.070(3), F.A.C., and Rule 2.1401, JEPB]

Recordkeeping and Reporting

7. The permittee will produce records on a monthly basis for the following:
   a. The amount and type of coatings applied (gallons per month, gal/mo)
   b. The VOC content of coatings as applied (pounds per gallon, lbs/gal)
   c. The HAP content of coatings as applied (lbs/gal)
   d. The amount and type of solvents applied/used, including clean-up solvents (gal/mo)
   e. The VOC content of solvents as applied/used (lbs/gal)
   f. The HAP content of solvents as applied/used (lbs/gal)
   g. The total VOC emissions (pounds per month, lbs/mo)
   h. The total and individual HAP emissions (lbs/mo)
   i. The type of abrasive blast media used
   j. The quantity of abrasive blast media used (lbs/mo)
   k. The total PM emissions, calculated based upon a maximum wind speed of 15 mph (lbs/mo)

   These records shall be retained for a minimum period of five (5) years and shall be made available to the Permitting Authority upon request.
   [Rule 62-4.070(3), F.A.C., and Rule 2.1401, JEPB]