
STATEMENT OF BASIS

Title V Air Operation Permit Renewal Permit No. 0050048-010-AV

APPLICANT

The applicant for this project is Berg Steel Pipe Corp. The applicant's responsible official and mailing address are: Mr. Andy Hicks, General Manager of Operations, Berg Steel Pipe Corp., Panama City Plant, 5315 W. 19th Street, Panama City, Florida 32401.

FACILITY DESCRIPTION

The applicant operates the Berg Steel Pipe Panama City Plant, which is located in Bay County at 1700 "E" Avenue in Panama City, Florida.

This facility includes two buildings, one previously owned by E.B. Pipe Coating, Inc. that includes the permitted operations of air operating permit 0050048-005-AO, which was transferred to Berg Steel Pipe Corp. in May of 2012. The other building is, and has been owned, by Berg Steel Pipe Corp. and includes the pipe mill operations (designated as insignificant emissions) where sheet metal is rolled into pipes. The E.B. Pipe Coating building (that is now owned by Berg Steel Pipe Corp.) produces coating metal pipe by a series of heating (EU008), abrasive blasting (steel shot), acid washing (EU009), oven curing, outer-diameter powder coating (EU010) or solvent-based paint application (EU011), and outer-diameter pipe quenching. Some of the pipe additionally undergoes inner-diameter abrasive blasting, and powder or solvent-based paint coating, and oven curing. Particulate emissions are controlled by filter dust collectors.

In order to avoid becoming a major stationary source with respect to prevention of significant deterioration (PSD) this facility requested a volatile organic compounds (VOC) emission limitation of 245 tons per year and a hazardous air pollutant (HAP) emissions limitation of 80 tons per year. Compliance with the facility-wide limitations is demonstrated by monthly and 12-month rolling total records. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility and to add regulatory requirements for an emergency generator RICE.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit issued January 24, 2000
Renewed Title V Air Operation Permit issued April 26, 2005
Renewed Title V Air Operation Permit issued March 11, 2010
Application for a Title V Air Operation Permit Renewal received June 20, 2014
Additional Information Request dated June 26, 2014
Additional Information Response received August 4 and September 10, 2014
Notice of Intent to Issue Air Permit issued September 26, 2014
Public Notice Published October 2, 2014

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major stationary source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

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NESHAP: The facility does operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

PROJECT REVIEW

This is a renewal of Title V Air Operating Permit 0050048-005-AV, effective March 11, 2010 and is being concurrently processed with construction permit 0050048-009-AC to remove obsolete specific conditions for EU (emissions unit) 010, Fusion Bonded Epoxy Powder Surface Coating Activities, and to incorporate an existing emergency stationary reciprocal internal combustion engine (RICE). Project 0050048-006-AV was a transfer of ownership on May 1, 2012 from E. B. Pipe to Berg Steel Pipe Corp. Projects 0050048-007-AC and 0050048-008-AC were exemption determinations for changes to the spray booths of EU010, and redesignated EU010 as insignificant activity.

This permit renewal also includes the addition of a new emissions unit (EU012), an emergency stationary reciprocating internal combustion engine (RICE) that was already being operated at the facility, but was considered an unregulated engine. The diesel engine for the emergency generator is now subject to 40 CFR 63 subpart ZZZZ, National Emission Standards for Stationary RICE. The engine is in compliance with 40 CFR 63, subpart ZZZZ, by meeting the applicable requirements of 40 CFR 60 subpart IIII, Standards of Performance for Stationary Compression Ignition Combustion Engines.

Also included in this permit are insignificant emissions units and/or activities (Appendix I-1), which has been updated to include the pipe mill operations, mentioned above, where sheet metal is rolled into pipes. This operation uses a 6.0 MMBtu (million British thermal unit) per hour natural gas (NG) fired plate dryer, a 1000 cubic feet per hour NG fired pipe dryer, and 50 gallons of ethyl acetate for cleaning.

Other changes that were made as part of this renewal include reformatting, replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, etc.

CONCLUSION

This project renews Title V air operation permit No. 0050048-005-AV, which was issued on March 11, 2010. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.