Permittee:
United States Marine Corps
USMC Support Facility - Blount Island
5880 Channel View Blvd.
Jacksonville, FL 32226-3404

DRAFT Permit No.: 0310099-012-AC
Facility ID No.: 0310099
SIC Nos.: 97
Project: New Paint/Blast Facility

This permit is for constructing a new paint and blast facility for the USMC Support Facility – Blount Island. The project will include the demolition of the existing Paint and Blast Building Number 352. The USMC Support Facility - Blount Island is a Title V facility located at 5880 Channel View Blvd., Jacksonville, Duval County, FL; UTM Coordinates: Zone 17, 449.80 km East and 3363.30 km North; Latitude: 30° 24' 18" North and Longitude: 81° 31' 21" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (FS) and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, Florida Administrative Code (FAC). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Environmental and Compliance Department, Environmental Quality Division (Permitting Authority) in accordance with the terms and conditions of this permit.

***Title V Air Operation Permit Application Due Date:**
Expiration Date:

Environmental and Compliance Department
Environmental Quality Division

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

*See Section II, Subsection B, Specific Condition 7

RSP/GHB

Section I. Facility Information

Subsection A. Facility/Project Description

This permit is for the construction of a new paint and blast facility for the USMC Support Facility – Blount Island. The project will include the demolition of the existing Paint and Blast Building No. 352, which includes the demolition of Emission Unit (EU) No.001 - Abrasive Blast Booth and the demolition of one paint booth described in EU No. 007 as Spray Coating Booth No.1. The proposed new paint and blast facility will consist of a blast booth, a cure booth (which can also operate as two independent cure booths) and a paint booth (which can also operate as two independent paint booths).

This Title V facility is a freight shipping container, military combat equipment, and aircraft ground support equipment maintenance facility. The facility operations include abrasive blasting and surface coating operations.

The existing facility is not a major stationary source of air pollution for Prevention of Significant Deterioration (PSD) purposes because the potential emissions of PSD air pollutants are less than 250 tons per year pursuant to Rule 62-210.200(189), FAC, and Rule 2.301, JEPB. The facility after completion of this project will not be a major stationary source of air pollution for PSD purposes because the potential emissions of PSD air pollutants will be less than 250 tons per year pursuant to Rule 62-210.200(189), FAC, and Rule 2.301, JEPB.

The facility is a major source of air pollution for Title V purposes because the potential emissions of at least one regulated air pollutant is greater than 100 tons per year pursuant to Rule 62-210.200(188), FAC, and Rule 2.301, JEPB.

The facility is a minor source of Hazardous Air Pollutants (HAP) because the potential emissions of HAP are less than 10 tons per year for any single HAP and less than 25 tons per year for total HAP.

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

EU ID No.	EU Description	Control Device
007	Spray Coating Booths	Spray Coating Booth No. 3: Dry filter system; Spray Coating Booth No. 5: Dry filter system ducted to twelve (12) vents; Spray Coating Booths Nos. 2 and 4 are uncontrolled.
008	New Abrasive Blast Booth	Two identical cartridge type dust collectors

Subsection C. Relevant documents

Title V Air Operation Permit No. 0310099-006-AV
Air Construction Permit application received May 12, 2011

Section II. Facility Wide Conditions

Subsection A. General Conditions

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida

Statutes. 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. 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 acknowledgement of title, and does 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 Permitting Authority 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 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, Florida Statutes. 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, FAC, as applicable. The permittee shall be liable for any noncompliance 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)
    ( ) Determination of Prevention of Significant Deterioration (PSD)
    ( ) Compliance with New Source Performance Standards
    ( ) Compliance with National Emissions Standards for Hazardous Air Pollutants

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 this 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:
        1. The date, exact place, and time of sampling or measurements;
        2. The person responsible for performing the sampling or measurements;
        3. The date(s) analyses were performed;
        4. The person responsible for performing the analyses;
        5. The analytical techniques or methods used;
        6. 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 that 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, FAC and Rule 2.1401, Jacksonville Environmental Protection Board (JEPB)]

Subsection B. Specific Conditions

1. Any revision(s) to a permit shall be submitted to and approved by the Permitting Authority prior to implementing.
   [Rule 62-4.080(2), FAC and Rule 2.1401, JEPB]

2. Permittee shall submit an annual operation report to the Permitting Authority for this (these) emission unit(s) on the form(s) supplied for each calendar year on or before April 1 of the following year.

[Rule 62-210.370(3), FAC and Rule 2.301, JEPB]

3. A permittee may request that a permit be extended as a modification of the permit. Such a request must be submitted to the Permitting Authority in writing before the expiration of the permit.
[Rule 62-4.080(3), FAC and Rule 2.1401, JEPB]

4. Permittee shall notify the Permitting Authority fifteen (15) days prior to EU testing.
[Rule 62-297.310(7)(a)(9), FAC and Rule 2.1201, JEPB.]

5. 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]

6. Stack sampling facilities shall comply with the applicable requirements of Rule 62-297.310(6), FAC, and Rule 2.1201, JEPB.

7. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for a Title V Air Operating Permit with compliance records and test results, to the Permitting Authority, at least 90 days prior to the expiration date of the construction permit but no later than 180 days after commencing operation.
[Rule 62-213.420(1)(a), FAC and Rule 2.501, JEPB]

8. 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]

9. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emission 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)(a), FAC and Rule 2.1101, JEPB]

10. The facility shall be subject to 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].

11. The facility shall be subject to JEPB Rule 2, Part Nos. I through VII, and Part Nos. IX through XIV.

12. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations.
[Rule 62-4.130, FAC and Rule 2.1401, JEPB]

13. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly.
[Rule 62-210.650, FAC and Rule 2.301, JEPB]

14. 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 2.1301, 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 2.201, JEPB]

15. Testing of emissions shall be conducted with the EU 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 may be tested at less than 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 permitted capacity in the permit.
[Rule 62-297.310(2), FAC and Rule 2.1201, JEPB]

16. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7), FAC and Rule 2.1201, JEPB]

17. Modifications: The permittee shall notify the Permitting Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Permitting Authority. Such permit shall be obtained prior to beginning construction or modification.
[Rule 62-210.300(1), FAC, Rule 62-212.300(1)(a), FAC, Rule 2.301, JEPB, and Rule 2.401, JEPB]

18. Source Obligation:

    a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), FAC, shall apply to the source or modification as though construction had not yet commenced on the source or modification.
    b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), FAC., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

    [Rule 62-212.400(12), FAC and Rule 2.401, JEPB]

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

Environmental and Compliance Department

Environmental Quality Division
407 North Laura Street, Third Floor
Jacksonville, FL 32202
Telephone: (904) 255-7100
Fax: (904) 588-0518

20. Any reports, data, notification, 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 and EPCRA Enforcement Branch
61 Forsyth Street
Atlanta, GA 30303
Telephone: 404/562-9155
Fax: 404/562-9163

Section III. Emissions Unit(s) and Conditions.

Emissions Unit No. 007 – Spray Coating Booths

Emissions Unit Description:	Four (4) spray coating booths for the application of coatings to freight containers (topcoat and primer) and principal end items such as 5-ton trucks, tanks, chassis loading systems, aircraft ground support equipment, and miscellaneous related parts. In addition, the four booths can be used to spray foam to produce enclosures for cold weather aircraft ground support equipment.
Control Device:	Spray Coating Booth No. 3: Dry filter system; Spray Coating Booth No. 5: Dry filter system ducted to twelve (12) vents; Spray Coating Booths Nos. 2 and 4 are uncontrolled.

Essential Potential to Emit (PTE) Parameters

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

Emission Limitations and Standards

2. The maximum allowable VOC emissions shall not exceed 245.0 tons per calendar year.
[Applicant's Request]

3. The maximum allowable HAP emissions shall not exceed 9.5 tons per year for any single HAP and 24.5 tons per year for total HAPs based on a 12-month rolling total.
[Applicant's Request]

Test Methods and Procedures

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

Recordkeeping and Reporting Requirements

5. Records shall be maintained on a monthly basis for the following:
   a. Coatings usage
   b. VOC and Hazardous Air Pollutant (HAP) content (lbs/gal) of coatings as applied
   c. Solvent / thinner usage
   d. VOC and HAP content of solvent / thinner
   e. VOC and HAP emissions

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

6. 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]

Emissions Unit No. 008 – New Abrasive Blast Booth

Emissions Unit Description -	Removal of paint from large equipment such as lighters and various smaller sized vehicles and equipment. The primary blast media utilized is aluminum oxide. Steel shot may also be used.
Control Device(s):	Two identical cartridge type dust collectors

Essential Potential to Emit (PTE) Parameters

1. The nominal volumetric flow rate from this emissions unit is 97,000 cubic feet per minute (cfm) for both baghouses (48,500 cfm each).
   [Rule 62-296.700(4), FAC and Rule 2.1101, JEPB]

2. The maximum process rate of abrasive consumed shall not exceed 5 tons per hour.
   [Rule 62-296.700(4), FAC and Rule 2.1101, JEPB]

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

Emission Limitations and Standards

4. Reasonably Available Control Technology (RACT) requirements including **Specific RACT Emission Limiting Standards for Stationary Emission Units** [Rule 62-296.700(3), FAC and Rule 2.1101, JEPB]**; Maximum Allowable Emission Rates** [Rule 62-296.700(4), FAC and Rule 2.1101, JEPB];

   Circumvention [Rule 62-296.700(5), FAC and Rule 2.1101, JEPB], and **Operation and Maintenance Plan** [Rule 62-296.700(6), FAC and Rule 2.1101, JEPB] shall apply to this emission unit.

5. Particulate Matter emissions shall not exceed 0.03 grains per dry standard cubic feet [24.94 pounds per hour and 109.24 tons per year (total for both dust collectors)].
   [Rule 62-296.712(2), FAC and 2.1101, JEPB]

6. Visible emissions (VE) shall not exceed 5 percent opacity for each dust collector.
   [Rule 62-296.712(2), FAC and 2.1101, JEPB]

Test Methods and Procedures

7. Testing for demonstration of compliance shall be performed in accordance with EPA Reference Method (RM) 5 (as described in 40 CFR 60, Appendix A) for particulate matter.
   [Rule 62-296.712(3)(b), FAC and 2.1101, JEPB]

8. Initial PM testing shall be conducted for each dust collector a minimum of 135 days prior to the expiration date of this permit. The minimum sample volume shall be 30 dry standard cubic feet.
   [Rule 62-296.712(3)(b), FAC and Rule 2.1201, JEPB]

9. Testing for demonstration of compliance shall be performed in accordance with EPA RM 9 (as described in 40 CFR 60, Appendix A) for the visual determination of opacity.
   [Rule 62-296.712(3)(a), FAC, Rule 2.1101, JEPB]

10. Initial VE testing shall be conducted for each dust collector a minimum of 135 days prior to the expiration date of this permit. The minimum period of observation shall be 30 minutes.
    [Rule 62-297.310(4)(a), FAC and Rule 2.1201, JEPB]

11. A Compliance Assurance Monitoring (CAM) determination shall be made after review of stack testing data and any other relevant information available on this emission unit. It is noted that uncontrolled PM emission data may be required to determine CAM applicability. Conduct PM stack testing accordingly.
    [40 CFR 64, Rule 62-213.440, FAC, and Rule 2.501, JEPB]

Reporting and Recordkeeping Procedures

12. An Operation and Maintenance Plan shall be attached to and shall be part of this permit. All activities shall be performed as scheduled and recorded. Data shall be made available to the Permitting Authority upon request. Records shall be maintained on file for a minimum period of two (2) years.
    [Rule 62-296.700(6)(e), FAC, and Rule 2.1101, JEPB]

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