STATEMENT OF BASIS

Title V Air Operation Permit Renewal
FINAL Permit No. 0310231-004-AV
Renewal of Title V Air Operation Permit No.: 0310231-003-AV

APPLICANT

The applicant for this project is North Florida Shipyards, Inc. The applicant's responsible official and mailing address are: Matthew Self, North Florida Shipyards, Inc. 2060 East Adams Street, Jacksonville, Florida, 32202.

FACILITY DESCRIPTION

The applicant operates North Florida Shipyards, Inc., which is located at 2060 East Adams Street, Jacksonville, Florida 32202.

North Florida Shipyards, Inc. is a full service ship repair and conversion operation. The facility operations include abrasive blasting, surface coating of ships and parts, steel work, machinery, electrical and piping work. Ships at this facility may also contract for services directly with independent contractors.

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

PROJECT DESCRIPTION

The purpose of this permitting project is to renew Title V Air Operation Permit No. 0310231-003-AV.

PRIMARY REGULATORY REQUIREMENTS

North Florida Shipyards, Inc. is classified as a Title V source because potential emissions of one or more individual criteria pollutants is equal to or greater than 100 tons per year in accordance with Chapter 62-210, FAC, and Rule 2.301 JEPB.

Based on the Title V Air Operation Permit Renewal application received November 30, 2011, this facility is classified as a major source for Hazardous Air Pollutants (HAPs) in accordance with Chapter 62-210, FAC, and Rule 2.301 JEPB.

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

Emissions Unit No. 002, Abrasive Blast Storage Silos, is subject to RACT requirements. These RACT requirements include **Specific RACT Emission Limiting Standards for Stationary Emissions 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].

Emissions Unit No. 005, Paint Spray Booth and Surface Coating Operations, is subject to 40 CFR 63, Subpart II, National Emission Standards for Shipbuilding and Ship Repair (Surface Coating), and 40 CFR 63, Subpart A, General Provisions (as described in Table 1 to Subpart II of Part 63, General Provisions of Applicability to Subpart II).

The surface coatings in Emission Unit No. 005 that are applied to the exterior of a marine vessel are exempt from any RACT VOC content limitation.

PROJECT REVIEW

The purpose of this permitting project is to renew Title V Air Operation Permit No. 0310231-003-AV.

Additional facility-wide conditions were added to the body of Permit No. 0310213-004-AV. While these facility-wide conditions did not appear in the body of Permit No. 0310213-003-AV, they were already present in Appendix TV-6. The additional conditions were added to the body of the permit for emphasis.

The nominal flow rate for Emission Unit No. 2 has been added under Section III. Emissions Unit(s) and Conditions, Emissions Unit No. 002 - Abrasive Blast Storage Silos, Specific Condition No. 2:

2. The nominal volumetric flow rate from this emissions unit is 3,000 cubic feet per minute.

New sections, **Source Commitments & Recordkeeping and Reporting Requirements**, have been added under **Section III, Emission Unit No. 002.** Specific conditions have been renumbered accordingly.

Source Commitments

12. The mobile fabric filter shall be connected to, and operating prior to and during any abrasive blast media silo loading operation.
[Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB

Recordkeeping and Reporting Requirements

13. Records shall be maintained quarterly for the throughput of the abrasive blast media silos. Records shall be maintained for five (5) years and made available to the Permitting Authority upon request.
[Rule 62-296.700(6), FAC, and Rule 2.1101, JEPB]

CONCLUSION

This project renews Title V Air Operation Permit No. 0310231-003-AV, which was issued on October 2, 2007. 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, Florida Administrative Code (F.A.C.). In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawing(s), plans, and other documents on file with the Permitting Authority.

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