Permittee:
Caterpillar Work Tools, Inc.
5801 Highway Avenue
Jacksonville, FL 32254

Final Permit No.: 0310248-007-AF
Facility ID No.: 0310248
SIC No(s).: 34
Project: Abrasive Blasting and Painting Operation

This permit is for the operation of an abrasive blasting and painting operation at a facility that fabricates miscellaneous construction vehicle parts. This facility is located at 5801 Highway Avenue, Jacksonville, Duval County, FL 32254; UTM Coordinates: Zone 17, 428.00 km East and 3354.59 km North; Latitude: 30° 19' 19" North and Longitude: 81° 44' 55" 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 Neighborhoods Department, Environmental Quality Division (Department) in accordance with the terms and conditions of this permit.

Operation Permit Application Due Date: **October 2, 2015**
Expiration Date: **November 30, 2015**

Neighborhoods Department
Environmental Quality Division

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

RSP/DH

Section I. Facility Information

Subsection A. Facility/Project Description

This permit is for the operation of an abrasive blasting and painting operation at a facility that fabricates miscellaneous construction vehicle parts. Particulate Matter (PM) from the paint booths is removed from exhausted air with a dry filter prior to discharge to the atmosphere. Unconfined particulate matter emissions are controlled through the use of reasonable precautions. Volatile Organic Compound (VOC) emissions are controlled through the use of low solvent coatings.

The facility is a synthetic non-Title V source of air pollution because the operational limit assumed by the owner will limit the potential emissions of regulated air pollutants to less than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP) to less than 10 tons per year for a single HAP and less than 25 tons per year for total HAPs pursuant to Rule 62-210.200, FAC, and Rule 2.301, JEPB.

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

EU No.	EU Description	Control Device
001	Air Blast Room	Uni-Wash/Polaris Intercept Model 3PC24 Cartridge Collector
004	No. 1 Paint Booth and Cure Oven	Paint Arrestor Filter/Low Solvent Coatings
005	No. 2 Paint Booth and Cure Oven	Paint Arrestor Filter/Low Solvent Coatings

Subsection C. Relevant documents

Air operation permit modification application received September 27, 2012
Air operation permit No. 0310248-005-AO
Air construction permit No. 0310248-006-AC

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, FS. The permittee is placed on notice that the Department 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 process 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 Department.

3. As provided in subsections 403.087(6) and 403.722(5), FS, 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 department 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 Department rules, unless specifically authorized by an order from the Department.

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 Department 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 Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department 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 Department 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 Department 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 Department 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 Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, FS. 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 Department 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 Department rules.

11. This permit is transferable only upon Department 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 Department.

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)

( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following:

    a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
    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 Department 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 Department, 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 Department, such facts or information shall be corrected promptly.
    [Rule 62-4.160, FAC, and Rule 2.1401, JEPB]

Subsection B. Specific Conditions

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

2. 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].

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

4. <u>General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited</u>. 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]

5. 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.
   [Rule 62-210.370(3), FAC, and Rule 2.301, JEPB.]

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

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

8. 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, the 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]

9. 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. Suspension of grading operations when winds exceed 20 miles per hour or when winds carry particulate matter beyond the property line.
   d. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, and similar activities.
   e. Reduction of unnecessary vehicle traffic and restriction of speeds to 15 miles per hour or less on all unpaved surfaces.
   f. Application of coverings, wind breaks and water and/or soil stabilizers to onsite dirt piles or other stockpiled particulate matter.
   g. Minimize the free fall distance of all transfer processes involving soil or other particulate matter.
   h. 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.
   i. Use of wheel washers or gravel bed where vehicles and/or equipment exit onto paved streets. Washing of vehicles and/or equipment as necessary.
   j. Landscaping or planting of vegetation.
   k. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
   l. Confining abrasive blasting where possible.
   [Rule 62-296.320(4)(c)., FAC, and Rule 2.1101, JEPB]

10. VOC emissions shall be limited to less than 100 TPY in order to insure that the facility is not a major emitting facility for VOC. TPY shall be defined as a 12 month rolling total (Applicant's request).
    [Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB.]

11. HAP emissions shall be limited to less than 10 TPY for any single HAP and to less than 25 TPY for any combination of HAPs in order to insure that the facility is not a major emitting facility for HAPs. TPY shall be defined as a 12 month rolling total (Applicant's request).
    [Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB.]

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

Neighborhoods Department
Environmental Quality Division
214 North Hogan Street, Suite 500
Jacksonville, FL 32202
Telephone: (904) 255-7100
Fax: (904) 588-0518

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

Environmental Protection Agency Region 4
Air, Pesticides and Toxics Management Division
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303–3104
Telephone: (404) 562-9155
Fax: (404) 562-9163

Section III. Emission Units and Conditions

Emission Unit No. 001- Air Blast Room

Emission Unit Description – Air blast room for miscellaneous construction vehicle parts.

Control Device – Uni-Wash/Polaris Intercept Model 3PC24 Cartridge Collector

Essential Potential to Emit (PTE) Parameters

1. The nominal volumetric flow rate from this emissions unit is 10,000 cubic feet per minute.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

2. The hours of operation for this emissions unit shall not exceed 4708 hours per year.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

3. The maximum process rate of abrasive blast media shall not exceed 10 tons per day of steel shot.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

4. PM emissions shall not exceed 5 pounds per hour, and 15 tons per year.
[Rule 62-296.700(2)(a), FAC, and Rule 2.1101, JEPB.]

5. Visible Emissions (VE) shall not exceed five (5) percent opacity.
[Rule 62-297.620(4), FAC, and Rule 2.1201, JEPB.]

Test Methods and Procedures

6. Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA Reference Method (RM) 5 (as described in 40 CFR 60, Appendix A) for particulate matter.
[Rule 62-297.310(4), FAC, and Rule 2.1201, JEPB.]

7. 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 62-297.310(4)(a)2., FAC, and Rule 2.1201, JEPB.]

8. VE shall be tested 60 months from the date of September 1, 2010.
   [Rule 62-297.310(7)3., FAC, and Rule 2.1201, JEPB]

Emission Unit No. 004- No. 3 Paint Booth and Cure Oven

Emission Unit Description – Paint Booth for painting attachments for heavy equipment.

Control Device – Paint Arrestor Filter/Low Solvent Coatings

Reasonably Available Control Technology (RACT) requirements including **Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities** [Rule 62-296.500(1 & 2), FAC, and Rule 2.1101, JEPB]; and **Surface Coating of Miscellaneous Metal Parts and Products** [Rule 62-296.513, FAC, and Rule 2.1101, JEPB] shall apply to this emission unit.

Essential Potential to Emit (PTE) Parameters

1. The hours of operation for this emissions unit shall not exceed 4,708 hours per year of coating application.
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

2. Coatings usage shall be limited to a maximum of 45,200 gallons per year and solvents usage shall be limited to a maximum of 4,732 gallons per year. (total of EU Nos. 004 and 005).
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. 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]

4. The spray booth shall not be operated unless all exhaust air passes through the paint arrestor filters.
   [Rule 62-210.650, FAC, and Rule 2.301, JEPB]

Test Methods and Procedures

5. Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA RM Method 24 (as described in 40 CFR 60, Appendix A) for VOC. Manufacturers data sheets with VOC contents may be substituted.
   [Rule 62-297.401(24), FAC and Rule 2.1201, JEPB]

Recordkeeping and Reporting Requirements

6. Records shall be maintained daily for the following:
   a. Gallons of coating(s) applied
   b. VOC content (lbs/gal) of coatings as applied
   c. Gallons of solvent / thinner usage as dilution agent
   d. VOC content (lbs/gal) of solvent / thinner
   e. Gallons of solvent / thinner usage for cleanup

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

Emission Unit No. 005- No. 4 Paint Booth and Cure Oven

Emission Unit Description – Paint Booth for painting attachments for heavy equipment.

Control Device – Paint Arrestor Filter/Low Solvent Coatings

Reasonably Available Control Technology (RACT) requirements including **Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities** [Rule 62-296.500(1 & 2), FAC, and Rule 2.1101, JEPB]; and **Surface Coating of Miscellaneous Metal Parts and Products** [Rule 62-296.513, FAC, and Rule 2.1101, JEPB] shall apply to this emission unit.

Essential Potential to Emit (PTE) Parameters

1. The hours of operation for this emissions unit shall not exceed 4,708 hours per year of coating application.
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

2. Coatings usage shall be limited to a maximum of 45,200 gallons per year and solvents usage shall be limited to a maximum of 4,732 gallons per year. (total of EU Nos. 004 and 005).
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. 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]

4. The spray booth shall not be operated unless all exhaust air passes through the paint arrestor filters.
   [Rule 62-210.650, FAC, and Rule 2.301, JEPB]

Test Methods and Procedures

5. Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA RM Method 24 (as described in 40 CFR 60, Appendix A) for VOC. Manufacturers data sheets with VOC contents may be substituted.
   [Rule 62-297.401(24), FAC and Rule 2.1201, JEPB]

Recordkeeping and Reporting Requirements

6. Records shall be maintained daily for the following:
   a. Gallons of coating(s) applied
   b. VOC content (lbs/gal) of coatings as applied
   c. Gallons of solvent / thinner usage as dilution agent
   d. VOC content (lbs/gal) of solvent / thinner
   e. Gallons of solvent / thinner usage for cleanup

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