Initial Title V Air Operation Permit
Permit No. 0810031-016-AV

APPLICANT

The applicant for this project is Pierce Manufacturing, Inc. The applicant's responsible official and mailing address are: Jim Johnson, President, Pierce Manufacturing, Inc., Bradenton Florida Facility, 2600 American Drive, Appleton, WI 54914.

FACILITY DESCRIPTION

The applicant operates the Bradenton Florida Facility, which is located at 1512 38th Avenue East, Bradenton, FL 34208.

The applicant applied on October 13, 2011 to the Department for an initial Title V air operation permit. This facility manufactures transportation products for commercial and military uses. Manufactured or remanufactured components are subsequently painted in paint spray booths and dried in drying ovens. A wide variety of one and two part paints, diluents, and solvents are used in the painting operation. The facility is subject to the requirements of 40 CFR 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. The facility generates Volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) from the use of paints/coatings, adhesives, solvent thinners, and general solvent clean up. The VOCs and HAPs associated with the painting operation are emitted without control. Particulate matter (PM) emissions from the paint booths are controlled by panel filters in the exhaust vents. There is an existing spark ignition reciprocating internal combustion engine associated with an emergency generator. Also included in this permit are miscellaneous insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is for an initial Title V permit for the above referenced facility.

> *(Note: The facility was once a Title V facility then became a non-Title V facility through a construction permit in 2005 that limited the emissions below the Title V threshold.)*

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Minor source Air Construction Permit No. 0810031-015-AC issued February 09, 2011 *(making the facility a Title V major source.)*
Initial Title V Air Operation Permit application received October 13, 2011
Notice of Intent to Issue Air Permit issued December 8, 2011
Public Notice Published December 20, 2011

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 source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate emissions units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate emissions 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 emissions units at the facility.

PROJECT REVIEW

This is the initial Title V Air Operation Permit that will replace the minor source Operating Permit No. 0810031-013-AO. It incorporates the provisions of Construction Permit 0810031-015-AC, which authorized the addition of a new paint booth, making the facility a major source of HAPs and a Title V facility. The Title V permit also includes an existing spark ignition (SI) RICE associated with an emergency generator. The SI RICE is subject to the requirements of 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

CONCLUSION

This project is for the initial Title V Air Operation Permit. This initial Title V air operation permit is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.