Department of
Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Colleen M. Castille
Secretary

PERMITTEE:

Insteel Wire Products, Inc.
Insteel Wire Products Florida
One Wiremil Road
Sanderson, Florida 32087

I.D. Number:	0030004
Permit/Cert Number:	0030004-006-AF
Date of Issue:	November 29. 2005
Expiration Date:	May 28, 2007
County:	Baker
Latitude/Longitude:	30°15'06"/82°15'34"W
UTM:	E-(17)378.9;N-3347.3
Project:	FESOP Modification

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-272, 62-296, 62-297 and 62-4. 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 department and made a part hereof and specifically described as follows:

PROJECT:

The purpose of this Federally Enforceable State Operating Permit [FESOP] modification is to remove Emission Unit 001, Powder Coater Shot Blast Unit. This process was replaced with a chemical cleaning station that is exempt from permitting requirements.

FACILITY DESCRIPTION:

Insteel Wire Products of Florida produces PC strand, high carbon seven-wire strand that is used to impart compression forces into precast structures and elements, providing reinforcement for prestressed and posttensioned concrete. PC strand is primarily used in concrete infrastructure applications including bridges, institutional and commercial buildings, parking decks and other slab on grade construction.

This facility operates under a FESOP in order to limit its Potential to Emit (PTE) Hydrochloric acid (HCl) at less than the major source threshold of 10 TPY for an individual Hazardous Air Pollutant (HAP). The facility has requested the maximum yearly HCl emission rate of 8.5 TPY as the cap for HCl potential emissions.
The facility consists of the following emission units:

Emissions Unit 002: Electro Static Powder Coater (PM controlled by baghouse)

Emissions Unit 003: Hydrogen Chloride Cleaning Unit

The following emission units are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C. pursuant to the Generic Emissions Unit Exemption (62-210.300(3)(b)1., F.A.C.).

Wire Drawing Machine with Dust Collector. Estimated emissions for this unit are 1.78 tons per year of particulate matter.

Chemical Cleaning Station (replaced EU 001, Powder Coater Shot Blast Unit). Estimated emissions for this unit are 46.7 pounds per year of VOC.

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OPERATING LOCATION

Located on US Highway 90 at SCL RR Crossing in Sanderson, Baker County, Florida.

RELEVENT DOCUMENTS:

Federally Enforceable State Operating Permit (FESOP) Application received September 30, 2005.
FESOP Permit Renewal issued May 28, 2002.
FESOP Permit No. 0190007-003-AF issued July 1, 1997 and modified July 18, 2000.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. 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 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 Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, 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 the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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 a reasonable time, 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 the 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.

GENERAL CONDITIONS:

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 non-compliance; and

   b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 for 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 403.73 and 403.111, 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 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 Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance 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)
   ( ) Compliance with New Source Performance Standards (NSPS)

GENERAL CONDITIONS:

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 the 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:

    - the date, exact place, and time of sampling or measurements;
    - the person responsible for performing the sampling or measurements;
    - the dates analyses were performed;
    - the person responsible for performing the analyses;
    - the analytical techniques or methods used; and
    - 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.

SPECIFIC CONDITIONS:

1. The I.D. No. and Project name for this source shall be used on all correspondence.

2. The hours of operation are not limited; i.e., 8760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

3. The maximum operating rates are listed below:
[FESOP Permit No. 0190007-003-AF modified July 18, 2000]

Emissions Unit	Material	Rate	
		lbs/hour	tons/year
002	Powder Coating	168	736
003	Hydrogen Chloride	450	1,972

4. The maximum allowable emission rate for each pollutant is stated below:

Pollutant	Emissions Unit	Emission Rate	Rule
Hydrogen Chloride	003	8.5 tpy	----- [1]
Visible Emissions	002 - 003	5 % Opacity	62-297.620(4), F.A.C.

[1] Basis: Emissions cap requested by applicant to avoid Title V Source classification.

5. Test the emissions within 60 days prior to the date stated below, notify the Department 15 days prior to testing [FAC Rules 297.310(7)(a)1 and 297.310(7)(a)9], and submit the test report documentation to the Department within 45 days after completion of the testing.
[FAC Rule 297-310(8)]

Pollutant	Emissions Unit	Test Method	Test Frequency	Rule
Hydrogen Chloride	003	EPA Method 26	Every 30 Months	----[1]
Visible Emissions	002 - 003	EPA Method 9	Each Federal Fiscal Year	62-297.310(7)(a)4. and 62-297.401 F.A.C.

[1]Basis: FESOP Permit No. 0190007-003-AF modified July 18, 2000

6. Operating Rate During Testing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operating at permitted capacity as defined below. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliane testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.
[Rule 62-297.310(2) F.A.C.]

7. In each test rerport, submit the maximum input/production rate at which this source was operated since the most recent test.

SPECIFIC CONDITIONS:

8. The permittee of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards. Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10 percent of its true value. [Rules 62-297.310(5)(a) and (b), F.A.C., Determination of Process Variables]

9. 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 may 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)(b), F.A.C., Special Compliance Test]

10. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any emissions unit whatsoever, including, but not limited to, 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. [Rule 62-296.320(4)(c)1, F.A.C., Unconfined Emissions of Particulate Matter]

11. Reasonable precautions may include, but shall not be limited to 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. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar emissions units.
    d. Removal of particulate matter from roads and other paved areas under the control of the permittee of the emissions unit to prevent re-entrainment, and from buildings or work areas to prevent particulate matter from becoming airborne.
    e. Landscaping or planting of vegetation.
    f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
    g. Confining abrasive blasting where possible.
    h. Enclosure or covering of conveyor systems.

    [Rule 62-296.320(4)(c)3, F.A.C., Unconfined Emissions of Particulate Matter]

12. In case of excess emissions resulting from malfunctions, the permittee shall notify the Department immediately in accordance with Rule 62-4.130, F.A.C. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence. A full written report on the malfunctions shall be submitted upon request by the Department. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rules 62-4.130 & 62-210.700(6), F.A.C.]

SPECIFIC CONDITIONS:

13. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2), F.A.C., Objectionable Odor Prohibited; and, Rule 62-210.200(203), F.A.C., Definitions-Objectionable Odor]

14. The Annual Operating Report for an Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year and submitted to the Department by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

15. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

16. A completed **Application For Non-Title V Air Permit Renewal** (DEP Form 62-210.900(4)) shall be submitted to the Department at least 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit. [Rule 62-4.090, F.A.C.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK/anp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

(Clerk) November 28, 2005 (Date)