



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen Castille
Secretary

PERMITTEE:

Owen Joist Corp.,
A Division of Commercial Metals Co.
SMI Joist of Florida, Inc.
14099 SE 44th Ave.
Starke, FL 32091

I.D. Number: 0070016
Permit/Cert Number: 0070016-008-AC
Date of Issue: October 14, 2005
Expiration Date: October 14, 2006
County: Bradford
Latitude/Longitude: 29°54'55"N;82°07'15"W
UTM: E-(17)391.8;N-3309.75
Project: Remove the 'Major
Source of HAPs'
Designation

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

Air Construction Permit No. 0070016-001-AC was issued for the initial operation of the facility as a major source of HAPs. The purpose of this project is to establish that the facility is no longer a major source of Hazardous Air Pollutants (HAPs). Since SMI Joist is no longer a major source of HAPs, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products is not applicable. The facility no longer uses paints and/or solvents that contain HAPs.

Air Construction Permit No. 0070016-004-AC was issued for the construction of six (6) new paint dip tanks and relocation of two (2) existing paint dip tanks. Since Paint Dip Tanks No. 7 and No. 8 were not constructed prior to the expiration of Project 004, this project will remove them from the permit.

This project will amend the above stated construction permits and revise current Title V Air Operation Permit No. 0070016-007-AV.

This project will also modify the dimensions of Dip Tank #1.

Pollutants: PM, Fugitives, NO_x, SO₂, VOC and CO.

FACILITY DESCRIPTION

This facility manufactures longspan steel joists used as engineered structural member in support of roof decks in buildings. Rolled steel products used as the raw materials. Various components are welded together using gas metal arc welding to form a joist. A crane lowers the joist into a paint dip tank to coat the joist with paint. The joist is then moved to the drying area. After drying in ambient air, the joists are either loaded for shipping to the customer or stored for near-term shipping.

This facility is **not** a major source of HAPs.

OPERATING LOCATION

Located at 14099 SE 44th Avenue, Starke, Bradford County, Florida.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Air Construction Permit No. 0070016-004-AC issued February 6, 2001.

Title V Air Operation Permit No. 0070016-007-AV issued August 5, 2003.

Construction/Title V Revision application received June 1, 2005.

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

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 the 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 not 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 no 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 permitted 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 record 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

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GENERAL CONDITION 7. continued:

- 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 non-compliance; and
- b. the period of non-compliance, 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 62-4.120 and 62-730.300, 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)

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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 measurement;
 - 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:

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

<u>E.U. ID No.</u>	<u>Brief Description</u>
-001	Fugitive Emissions from: <ul style="list-style-type: none"> ▪ Paint Dipping Tank No. 1 is 75' (L) x 4.5' (W) x 7.67' (D) ▪ Paint Dipping Tank Nos. 2, 3, and 4. Each are 75'(L) by 4.5'(W) by 6.17'(D) ▪ Paint Dipping Tank Nos. 5 and 6. Each are 22'(L) by 4'(W) by 6'(D)

Emission Unit 001 identifies the fugitive emissions associated with the six (6) paint dipping tanks used at the facility. Joist products are dipped into the tank to allow full paint coverage and the suspended over the tanks so that the excess can drip back into the tank. Spray guns are used for touch up painting in this area, however the usage is limited to 2,500 gallons of coating per calendar year.

Essential Potential to Emit (PTE) Parameters

1. Capacity. The maximum rates listed below shall not be exceeded without prior Department approval:

<u>Material</u>	<u>Rate (per 12 consecutive months)</u>
Spray Gun Coating Usage	2,500 gallons
Clean-up Solvent	400 gallons

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., Permit 0070016-001-AC]

2. Hours of Operation. This emissions unit is allowed to operate continuously; 24 hours per day, 7 days per week, 52 weeks per year; i.e. 8,760 hours/year.

[Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

3. Volatile Organic Compounds. VOC emissions, on a facility-wide basis, shall not exceed 330 tons per 12-month rolling average.

[Air construction permit 0070016-004-AC; Applicant Requested Facility-wide Emissions Cap to escape PSD review.]

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

4. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. At a minimum, the following procedures shall be us followed to minimize pollutant emissions:

- Maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.
- Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc., of VOC so that it can be covered when not in use
- All fittings, valves, lines, etc., shall be properly maintained
- All VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.
- Maintain a monthly accounting of the paint used per type such that the beginning inventory and deliveries are accounted for. The amount used shall be calculated by adding the beginning inventories to the deliveries less the ending inventories.

[Rule 62-296.320(1)(a), F.A.C.; Air Construction Permit No. 0070016-004-AC.]

Test Methods and Procedures

Recordkeeping Requirements:

5. Compliance with **Specific Condition 3.** shall be determined by recording the following data for each material used that contains VOC.

Quantity	
• Gallons of Clean-up Solvent Used	• Gallons of Coating Used in Spray Guns
Emissions Factors	
• Density of Material (Pounds per Gallon)	• Constituent Factor (Percentage by Weight) • Any Other Factor Necessary to Determine Emissions Into Air
Emissions	
• Total Cumulative Emissions (Determined from a Monthly Rolling Average of VOC Emissions)	

[FINAL Title V Permit No. 0070016-002-AV; Construction Permit No. 0070016-004-AC]

Reporting Requirements:

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

6. Reporting. A report of the data required by **Specific Condition 5**, shall be submitted to the Northeast District Office on a semi-annual basis. These reports shall be postmarked no later than the 60th day following the end of the reporting period defined below:

<u>Reporting Period</u>	<u>Report Due Date</u>
January - June	September 1
July-December	March 1*

*The annual operating report for that calendar year may be submitted in lieu of the July-December semi-annual report.

7. Emission factors and emissions calculation methods used to determine the data required in **Specific Condition No. 6**, shall be consistent with those used in the Title V permit application submitted June 17, 1996.

[FINAL Title V Permit No. 0070016-002-AV]

ADMINISTRATIVE

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

[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

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