Permittee:
U.S. Marine Corps
5880 Channel View Blvd.
Jacksonville, FL 32226

DRAFT Permit No.: 0310099-008-AC
Facility ID No.: 0310099
SIC Nos.: 97
Project: Replacement of the Dust Collectors on the HTSI Abrasive Blast Booth

This permit is for the replacement of the dust collectors on Emission Unit (EU) No. 001, the HTSI Abrasive Blast Booth, at the Marine Corps Support Facility - Blount Island. This facility is a Title V facility. The Marine Corps Support Facility - Blount Island is located at 5880 Channel View Blvd., Jacksonville, Duval County, FL; UTM Coordinates: Zone 17, 449.76 km East and 3363.60 km North; Latitude: 30° 24' 18" North and Longitude: 81° 31' 23" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (FS) and Florida Administrative Code (FAC) Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297. 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 Environmental and Compliance Department, Environmental Quality Division (Department) in accordance with the terms and conditions of this permit.

Title V Air Operation Permit Application Due Date: *
Expiration Date:

Environmental and Compliance Department
Environmental Quality Division

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

* See Section II, Subsection B, Specific Condition 3

RSP/HDS

Section I. Facility Information

Subsection A. Facility/Project Description

This permit is for the replacement of the dust collectors on EU No. 001, the HTSI Abrasive Blast Booth, at the Marine Corps Support Facility - Blount Island. This facility is a Title V facility. The two dust collectors currently ducted into a common stack will be replaced by a single dust collector. The dust collector that is ducted into the Mechanical Room will also be replaced.

This Title V facility is a freight shipping container, military combat equipment, and aircraft ground support equipment maintenance facility. The facility operations include abrasive blasting and surface coating operations.

The facility is a major source of air pollution because the potential emissions of regulated air pollutants are greater than 100 tons per year and/or the potential emissions of Hazardous Air Pollutants (HAP) are greater than 10 tons per year for a single HAP and/or greater than 25 tons per year for total HAP pursuant to Chapter 62-210, FAC, and Rule 2.301, Jacksonville Environmental Protection Board (JEPB).

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

E.U. ID No.	EU Description	Control Device
001	Abrasive Blast Booth	Wheelabrator Jet Pulse Cartridge Dust Collector, Model JPSMA – 5D125 Wheelabrator-Frye Model 704C Dust Collector (ducted into the Mechanical Room)

Subsection C. Relevant documents

Title V Air Construction Permit No. 0310099-007-AV
Air construction permit application received March 21, 2008

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 2.1301, 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 2.1301, JEPB]

2. The construction/modification shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing sixty (60) days prior to the expiration of the construction permit. A new schedule and request for an extension of the construction permit must be submitted.
   [Rule 62-4.080(2), FAC, and Rule 2.1301, JEPB]

3. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for a Title V Air Operating Permit with compliance records and test results, to the Department, at least two hundred twenty five (225) days prior to the expiration date of the construction permit but no later than 180 days after initial start-up, whichever occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid operating permit to operate.
   [Rule 62-210.300(2), FAC, Rule 62-213.420(1)(a)2., FAC, Rule 2.301, JEPB, and Rule 2.501, JEPB]

4. Permittee shall submit an annual operation report to the Department for this (these) emission unit(s) on the form(s) supplied for each calendar year on or before March 1.
   [Rule 62-210.370(3), FAC, and Rule 2.301, JEPB]

5. Excess emissions resulting from startup, shutdown, or malfunction of any emission unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Permitting Authority in accordance with Rule 62-4.130, FAC and Rule 2.1301, JEPB. A full written report on the malfunctions shall be submitted to the Permitting Authority in a quarterly report, if requested by the Permitting Authority.
   [Rule 62-210.700, FAC, and Rule 2.201, JEPB]

6. Permittee shall notify the Department fifteen (15) days prior to EU testing.
   [Rule 62-297.310(7)(a)(9), FAC, and Rule 2.1101, 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 2.1101, 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, then the EUs 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 2.1101, JEPB]

9. Control equipment shall be provided with a method of access that is safe and readily accessible.
   [Rule 62-297.310(6), FAC, and Rule 2.1101, JEPB]

10. 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. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
    d. 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.
    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), FAC, and Rule 2.1001, JEPB]

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

Environmental and Compliance Department
Environmental Quality Division
117 West Duval Street, Suite 225
Jacksonville, FL 32202
Telephone: (904) 630-4900
Fax: (904) 630-3638

Section III. Emission Units and Conditions

Emissions Unit No. 001 - Abrasive Blast Booth

Emissions Unit Description - Removal of paint from refrigerated/non-refrigerated freight containers and principal end items such as chassis loading systems, front-end loaders, etc. The abrasive blast media utilized is aluminum oxide and steel shot. Aluminum oxide blast media is used on aluminum substrate and steel shot is used on steel substrate.

Control Device(s) - Wheelabrator Jet Pulse Cartridge Dust Collector, Model JPSMA – 5D125
Wheelabrator-Frye Model 704C Dust Collector (ducted into the Mechanical Room)

Essential Potential to Emit (PTE) Parameters

1. The nominal volumetric flow rate from this emissions unit is 87,000 cubic feet per minute.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. Reasonably Available Control Technology (RACT) requirements including **Specific RACT Emission Limiting Standards for Stationary Emission Units** [Rule 62-296.700(3), FAC, and Rule 2.1001, JEPB]**; Maximum Allowable Emission Rates** [Rule 62-296.700(4), FAC, and Rule 2.1001, JEPB]; **Circumvention** [Rule 62-296.700(5), FAC, and Rule 2.1001, JEPB], and **Operation and Maintenance Plan** [Rule 62-296.700(6), FAC, and Rule 2.1001, JEPB] shall apply to this emission unit.

3. The maximum process shall not exceed 18.0 tons/hour.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

4. The hours of operation for this emissions unit shall not exceed 4,160 hours per year.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

5. Particulate Matter emissions shall not exceed 0.03 grains per dry standard cubic feet [22.37 pounds per hour and 46.53 tons per year].
   [Rule 62-296.712(2), FAC, and 2.1001, JEPB]

6. Visible emissions (VE) shall not exceed 5 percent opacity.
   [Rule 62-296.712(2), FAC, and 2.1001, JEPB]

Test Methods and Procedures

7. Testing for demonstration of compliance shall be performed in accordance with EPA Reference Method (RM) 5 (as described in 40 CFR 60, Appendix A) for particulate matter. The minimum sample volume shall be 30 dry standard cubic feet. Initial PM testing shall be conducted within 90 days after startup of the new baghouse(s).
   [Rule 62-296.712(3), FAC, and 2.1001, JEPB]

8. 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. Initial VE (concurrently with PM testing) testing shall be conducted within 180 days afterstartup of the new baghouse(s). VE testing shall be conducted for a minimum period of 30 minutes.
   [Rule 62-296.712(3), FAC, Rule 62-297.310(4)(a)2., FAC, Rule 2.1101, JEPB and 2.1001, JEPB]

9. A Compliance Assurance Monitoring (CAM) determination shall be made after review of stack testing data and any other relevant information available on this emission unit. It is noted that uncontrolled PM emission data may be required to determine CAM applicability. Conduct PM stack testing accordingly.
   [40 CFR 64, Rule 62-213.440, FAC, and Rule 2.501, JEPB]

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