

Permittee:

TTX Company
1450 West Church Street
Jacksonville, FL 32204

Permit No.: 0310297-006-AO**Facility ID No.:** 0310297**SIC No.:** 37**Project:** Railcar/Boxcar Spray Painting Operation

This permit is for the operation of a railcar/boxcar spray painting operation. The facility is located at 1450 West Church Street, Jacksonville, Duval County, FL 32204; UTM Coordinates: Zone 17, 435.100 km East and 3355.700 km North; Latitude: 30° 19' 58" North and Longitude: 81° 40' 53" 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 Environmental Resource Management Department, Environmental Quality Division (Department) in accordance with the terms and conditions of this permit.

Operation Permit Application Due Date: **June 1, 2012**
Expiration Date: **July 31, 2012**

Environmental Resource Management Department
Environmental Quality Division

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

RSP/HDS/rdr

Section I. Facility Information

Subsection A. Facility/Project Description

This project is for the operation of a railcar/boxcar spray painting operation. Railcars are painted in an approximately 250 feet long building. The interior of boxcars are also painted at the facility outside of the railcar building. The boxcar doors are only partially opened during the painting process to allow paint, air supply hoses, and light into the boxcar. The coatings are applied using an airless spray process. Particulate Matter (PM) is removed from exhausted air on the railcar painting process with a dry filter prior to discharge to the atmosphere.

The facility is a synthetic minor source of air pollution because operational restrictions 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 (HAPs) 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, Jacksonville Environmental Protection Board (JEPB).

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

<u>EU No.</u>	<u>EU Description</u>	<u>PM Control Device</u>
001	Railcar/Boxcar Spray Painting Operation	Slit & Expanded Kraft Paper Filter on Railcar Painting Operation

Subsection C. Relevant documents

Permit No.: 0310297-004-AC

Air operation permit application received July 30, 2007

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. Stack sampling ports and platforms shall not be required.
- 3. The 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]
- 4. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit.
[Rule 62-4.090, FAC, and Rule 2.1301, JEPB]

5. Unconfined particulate matter emissions from yard operations, open stock piling of materials and /or materials handling operations shall be controlled by using the following reasonable precautions.
- Reduced speed for vehicular traffic.
 - Use of liquid resinous adhesives or other liquid dust suppressants or wetting agents.
 - Use of paving or other asphaltic materials.
 - Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or otherwise by wetting prior to sweeping.
 - Covering of trucks, trailers, front end loaders, and other vehicles or containers to prevent spillage of particulate matter during transport.
 - Use of mulch, hydro seeding, grassing, and/or other vegetative ground cover on barren areas to prevent or reduce particulate matter from being windblown.
 - Use of hoods, fans, filters, and similar equipment to contain, capture, and vent particulate matter.
 - Enclosures or covering of conveyor systems.
- [Rule 62-296.320(4)(c)2 & 3, FAC, and Rule 2.1001, JEPB]
6. Maximum facility wide emissions shall be limited to 35.95 tons per year for volatile organic compounds. Maximum facility wide emissions shall be limited to 9.0 tons per year for any single Hazardous Air Pollutant (HAP) and to 22.5 tons per year for total HAPs in order to maintain emissions below the major source HAP threshold. All tons per year limits are based on a 12-month rolling total.
[Rule 62-212.300(1)(d), FAC, and Rule 2.401, JEPB]
7. An inventory report of HAP emissions [single HAP and total HAPs] shall be submitted to the Environmental Quality Division for each six month period. Each report shall delineate single HAP emissions for each HAP emitted in quantities of 1000 pounds or more for the period and shall total all HAPs emitted for the period. The report for period two, shall also provide summary totals for the year for any single HAP previously reported and for total HAPs. Monthly summaries for Total VOCs, total HAPs, and the single highest HAP as determined by Section III, Specific Condition No. 9 shall also be submitted with these reports. The reports shall be due as follows: Period No. 1 (January through June) due on or before September 1, and Period No. 2 (July through December) due on or before March 1.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]
8. The permittee shall submit all compliance related notifications and reports required of this permit to:

Environmental Resource Management 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

Emission Unit No. 001- Railcar/Boxcar Spray Painting Operation

Emission Unit Description: Railcars are painted inside a building with airless spray guns. Boxcar interiors are painted outside the building with only the boxcar doors partially opened during the painting process to allow paint, air supply hoses and light into the boxcar.

Control Device: Slit & Expanded Kraft Paper Filter on the railcar painting operation

Potential to Emit (PTE)

1. This EU shall be allowed to operate continuously, i.e., 8,760 hours per year.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. 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 2.1001, JEPB]; and **Surface Coating of Miscellaneous Metal Parts and Products** [Rule 62-296.513, FAC, and Rule 2.1001, JEPB] shall apply to this emission unit.
3. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. 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 2.1001, JEPB]
4. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity) in accordance with Rule 62-296.320(4)(b)1., FAC, and Rule 2.1001, JEPB. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, FAC, and Rule 2.1101, JEPB. Testing shall be required upon request of the Department.
5. Coatings and solvents applied shall be limited to a maximum of 20,540 gallons per year.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]
6. Coatings (as applied) shall not exceed a maximum of 3.5 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water.
[Rule 62-296.513(2)(a)2, FAC, and Rule 2.1001, JEPB]
7. The railcar painting building shall not operate unless all exhaust from the painting operation air passes through the kraft paper filter media.
[Rule 62-210.650, FAC, and Rule 2.301, JEPB]

Test Methods and Procedures

8. Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA Reference Method 24 (as described in 40 CFR 60, Appendix A) for VOC. Manufacturers data sheets with VOC contents may be substituted.
[Rule 62-296.513(4), FAC and Rule 2.1001, JEPB]

Recordkeeping and Reporting Requirements

9. Records shall be maintained monthly 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
- f. HAP lbs/gal of coating(s) and solvent / thinner as applied
- g. Number of railcars processed
- h. Number of boxcars processed
- i. VOC emissions
- j. Total HAP emissions
- k. Highest single HAP emission

In addition to the Annual Operating Report, reports shall be submitted as required by Section II, Subsection B, Specific Condition No. 7.

[Rule 62-296.500(2)(b) and (c), FAC, and Rule 2.1001, JEPB]

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to S.120.52(7), FS, with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk

Date