

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

I. GENERAL INFORMATION

A. APPLICANT

The Haskell Company
Haskell Steel Fabrication Division
111 Riverside Avenue
Jacksonville, FL 32202

Permit No.: 0310555-001-AC
County: Duval

B. PROJECT

This permit is for the existing structural steel fabrication facility. The facility fabricates structural steel shapes used for constructing metal structures and buildings. Preformed shapes are fitted together to make building components. The facility includes paint spraying, de-scaling process and open air sandblasting.

II. RULE APPLICABILITY

The facility is located in an area designated as attainment for the air pollutant sulfur dioxide (effective March 8, 1999), as unclassifiable for the air pollutant particulate matter less than or equal to ten (10) micrometers, and an air quality maintenance area for air pollutants particulate matter and ozone pursuant to Chapter 62-204, Florida Administrative Code (FAC), and Rule 2.201, Jacksonville Environmental Protection Board (JEPB).

The facility is a minor source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year pursuant to Chapter 62-210, FAC, and JEPB Rule 2.301.

III. TECHNICAL EVALUATION

Emission Unit No. 001-Spray Painting: Paint is applied to fabricated metal parts.

The hours of operation for this emissions unit shall not exceed 2,496 hours per year.

Coatings (as applied) shall not exceed a maximum of 3.5 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water.

Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA Reference Method (RM) 24 (as described in 40 CFR 60, Appendix A) for VOC content of coatings. VOC compliance may be demonstrated by submitting manufacturer's material safety data sheets containing the VOC contents with approval of the Department.

Records shall be kept on a monthly basis for the following:

- a. The amount and type of coating applied
- b. VOC content (lbs/gal) of coatings as applied
- c. The amount and type of solvents used (including clean-up solvents)
- d. Hazardous air pollutants (HAP) content of coatings and solvents
- e. Total VOC emissions
- f. Total and individual HAP emissions

Records shall be maintained on file for a minimum period of two (2) years and shall be made available to the Department upon request.

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Emission Unit No. 002-De-scaling Process: Fabricated metal parts processed through a de-scaler machine with a Donaldson Torit Dust Collector Model DFO-2

The nominal volumetric flow rate is 2,900 cubic feet per minute.

The hours of operation for this emissions unit shall not exceed 2,496 hours per year.

Particulate matter (PM) emissions shall not exceed one (1) ton per year.

Visible emissions (VE) shall not exceed five (5) percent opacity.

Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA Reference Method 9 (as described in 40 CFR 60, Appendix A) for the visual determination of opacity. Testing shall be conducted for a minimum period of 30 minutes.

Emission Unit No. 003-Sandblasting: Open air sandblasting of fabricated metal parts.

The hours of operation for this emissions unit shall not exceed 2,496 hours per year.

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 reentrainment, 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.

IV. CONCLUSION

Based upon information provided by The Haskell Company, the Department has reasonable assurance that the existing structural steel fabrication facility, as described in this evaluation and subject to the conditions proposed herein, will not cause, or contribute to a violation of any ambient air quality standard or other technical provision of Chapters 62-296 and 62-297, FAC, JEPB Rules 2.1001 and 2.1101.

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