




Florida Department of
Environmental Protection

Memorandum

To: Khalid Al-Nahdy
Northeast District Office

Through: Clair Fancy, P.E. 
Bureau of Air Regulation

Through: Al Linero, P.E. 
New Source Review Section

From: Joseph Kahn, P.E. 
Emissions Monitoring Section

Date: January 25, 2001

Re: PSD Applicability Determination for SMI Joist of Florida

I have reviewed the information submitted by Nelson Engineering Company on behalf of SMI Joist. Although permitted for 283 tons per year of VOC emissions from the facility, SMI Joist is seeking to be recognized as an existing minor facility for purposes of PSD, based on the fact that actual emissions of VOC have never equaled or exceeded 250 tons per year. SMI Joist estimated actual emissions from operating records and material balance calculations. The information provided supports SMI Joist's request. Based on the information submitted, actual emissions have not exceeded approximately 210 tons per year since the facility's original construction in 1967. VOC emissions for the latest calendar year (2000) were approximately 193 tons. The level of historical emissions seems reasonable considering the size of the facility and the fact that only two dip tanks existed at the facility until the construction of the four additional dip tanks by SMI in 1998.

Because the estimate of actual emissions is straightforward, and because actual emissions have been well below the threshold for a PSD major facility even after construction of the four additional tanks at the facility, it is acceptable to recognize the existing facility as a minor facility for purposes of PSD. The presently proposed additional expansion may then be permitted without subjecting the modification to PSD review. This expansion will bring the total permitted emissions of VOC at the facility to 330 tons per year. This should all be done as part of the pending permitting project, in a manner that will make the 330 ton per year facility-wide emission limit federally enforceable. This determination is consistent with past guidance from EPA. Upon construction of the proposed modification, the facility will be considered to be a major facility for purposes of PSD, so future modifications will be subject to PSD review if the associated VOC emissions increase is equal to or greater than 40 tons per year. Of course, the district must revise the 1998 annual operation report information in ARMS to reflect the corrected information submitted by the applicant.

Please let me know if you have any questions about this determination.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

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OCT 2 1990
DER

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Florida Power and Light Company (FPL), Lauderdale Repowering
Project (PSD-FL-145)

Dear Mr. Fancy:

We acknowledge receipt of the Technical Evaluation and Preliminary Determination and proposed permit to construct the modified boiler units 4 and 5, gas turbines 1 through 24, 3 fuel tanks, and all other miscellaneous stationary sources of air pollution at the above referenced facility.

We have reviewed the package and offer the following comments.

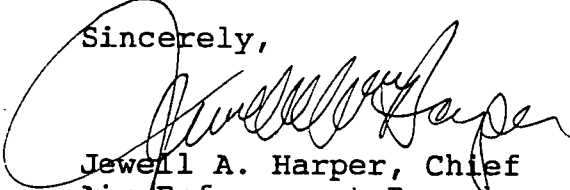
At the outset, we note that this permit action is being processed in advance of the pending modification at FPL involving the addition of new combustion turbines and heat recovery steam generators. We also note that the intended purpose of this permit is to impose federally enforceable permit conditions on FPL designed to limit potential emissions of volatile organic compounds (VOC) to below 100 tons per year (tpy). This action would theoretically make the existing FPL facility a "minor" source for nonattainment new source review (NSR) purposes and thus allow the future planned modification to increase VOC emissions by an additional 99 tpy. This action could easily be misconstrued as a deliberate attempt to circumvent the NSR regulations, and we feel that both "modifications" should normally be included as part of the same permit application. For example, if a company clearly intends to install two new presses at a major VOC facility located in a nonattainment area, it would obviously be considered circumvention for the permitting agency to issue separate permits limiting each unit to 39 tpy. We do feel, however, that there may be situations where limiting a source's potential emissions is valid and can be used to establish "minor source" status.

We recognize that many facilities may have the potential to emit VOC in excess of 100 tpy, but for whatever reason(s), a facility may actually be emitting considerably less than this amount. In these situations, we would not feel that it is inappropriate to limit the facility's potential to emit down to an emissions level indicative of

historic actual emissions. To discount previous actual levels of emissions and arbitrarily choose 99 tpy as the appropriate permit limit, however, does not appear to represent good permitting practice and should be discouraged. We strongly suggest that your Agency reconsider this proposed permitting action. We would be happy to discuss this with you in more detail at your convenience.

We appreciate the opportunity to review this package before the issuance of the final permits. Any further technical comments should be directed to Mr. Ahmed Amanulah of my staff at (404) 347-2904.

Sincerely,



Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: Mr. A. A. Linero
Broward County Environmental Control Board
500 S. W. 14th Court
Fort Lauderdale, FL 33315

S. Brooks, SE District
3/1/87

--ATTENTION MAIL ROOM--

**PLEASE ROUTE THIS
DOCUMENT TO:**

Joe Kahn

Name of Individual/Office

5500

Mail Station Number

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

3. _____

1. Joe Kahn

4. _____

2. DARM

5. _____

PLEASE PREPARE REPLY FOR:

- SECRETARY'S SIGNATURE
- DIV/DIST DIR SIGNATURE
- MY SIGNATURE
- YOUR SIGNATURE
- DUE DATE _____

COMMENTS:

Please review and comment.

ACTION/DISPOSITION

- DISCUSS WITH ME
- COMMENTS/ADVISE
- REVIEW AND RETURN
- SET UP MEETING
- FOR YOUR INFORMATION
- HANDLE APPROPRIATELY
- INITIAL AND FORWARD
- SHARE WITH STAFF
- FOR YOUR FILES

RECEIVED
JAN 10 2000
Bureau of Air Monitoring
& Mobile Sources

FROM: Khalid Ac-Nahdy NED DATE: _____ PHONE: _____



December 20, 2000

Christopher L. Kirts, P.E.
Florida Department of Environmental Protection
District Air Program Administrator
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

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DEC 22 2000

STATE OF FLORIDA
DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT-JAX

Bureau of Air Monitoring
& Media Services

JAN 10 2000

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SUBJECT: Response to request for Additional Information regarding Title V Air Permit Application and Construction Permit Application for the CMC Steel Fabricators, SMI Joist of Florida, Facility I.D. No. 0070016.

Dear Mr. Kirts:

This letter is in response to three questions outlined in your letter dated November 6, 2000 regarding air permitting issues for the SMI Joist of Florida facility. Hopefully, the information conveyed here clarifies the air permitting intentions and the past activities for this facility.

On October 26, 2000, Mr. Glenn Shealy of the SMI Environmental Department initiated a call to Mr. Joseph Kahn, Florida DEP, regarding air permitting for SMI Joist of Florida. The initial focus of the discussion concerned the 88 annual tons of VOC emissions that SMI Joist of Florida considered as pre-PSD baseline emissions for permitting purposes. SMI Joist Florida initially requested an increase in VOC emissions to a total of 338 tons per year (tpy) without triggering PSD review. This level was determined by increasing the 88 tpy pre-PSD baseline emissions by 250 tpy. Mr. Kahn stated that the Florida DEP Tallahassee office was unreceptive to allowing SMI Joist Florida 88 tpy of pre-PSD baseline emissions. However, since the actual annual emissions at the facility have never exceeded 210 tons of VOCs, Mr. Kahn indicated that SMI Joist of Florida could submit an amendment to the permit application submitted on October 2, 2000, requesting reclassification to a Synthetic Minor Source for Pollutants other than HAPs. After this initial discussion, Mr. Kahn communicated this reclassification option to Mr. Khalid Al-Nahdy, Florida DEP Northeast District Permit Engineer. Both were in agreement that increased emissions up to a total of 330 tpy could then be included in the Title V permit.

Based on the facts presented in this letter and the suggestions of the Florida DEP, SMI Joist of Florida requests that the October 2, 2000 Title V Permit Modification application (that includes the six existing paint dip tanks and construction of two new dip tanks) be reclassified as a Synthetic Minor Source of Pollutants other than HAPs, while subsequently increasing emissions to a facility wide limit of 330 tpy VOC.

In response to questions outlined in the November 6, 2000 letter regarding SMI Joist of Florida's Title V Permit Modification application, the following information is submitted.

Question 1: Please provide the actual annual emissions for each calendar year (or part year) of ownership and a summary of the data available to support the actual emissions calculations. Please reconcile any discrepancies between your response and the information previously submitted, such as annual operating reports.

Response 1: Attachment 1 contains the actual annual emissions for each calendar year of production and painting operations and a summary of the data used to calculate these emissions.

In 1998, operating emissions were reported on the Annual Operating Report at 283 tons. This was in error, as 283 tons was the Construction Permit emissions limit. Actual emissions were 210 tons and the annual permit fee paid for 1998 was based on the correct actual emissions of 210 tons.

Question 2: Please provide a brief history of the facility and its emissions units, noting previous owners and any periods that the facility did not operate.

Response 2:

Facility History

The Starke Joist facility was constructed in 1967.

- Previous owner was Owen Joist of Florida Incorporated.
- SMI Steel purchased this facility in November 1994.
- From December 1991 until August 1995, this facility was temporarily shut down.

Emission Unit History

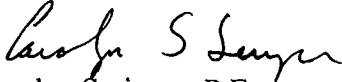
- Two paint dip tanks were on site when SMI bought this facility from the Owen Company. The exact date that these two original tanks were installed cannot be established.
- SMI representatives met with Florida DEP personnel on January 22, 1996 to discuss facility air permitting.
- In November 1996, the Florida DEP issued a construction permit for emission unit 001 (the two dip tanks) with a facility wide VOC limit of 220 tons per year.
- On May 27, 1996 the Florida DEP issued a Title V operating permit for the two dip tanks.
- Four new dip tanks were constructed on site after the Florida DEP issued the August 18, 1998 permit to construct. This permit had a VOC limit of 283 tpy for emission unit 001, which included the two existing tanks and the four new tanks.

Question 3: Please provide a summary of operation by previous owners, if available, as well as a summary of production records available from previous owners. Please advise if this information is not available.

Response 3: Access to specific past operation data and production records generated by the previous owners is limited. However, past maximum production by the previous owner has been estimated to be 13,000 tons of joist per year. Using an emission factor of 14 pounds VOC per ton of joist produced, VOC emissions are calculated to be approximately 91 tpy .

Thank you for your assistance and suggestions pertaining to this matter. Please contact me at (321) 269-1113 if you have any other questions or need additional information.

Sincerely,



Carolyn Seringer, P.E.
Vice President

Attachment

cc:

Mr. Mark Ripke, SMI Joist of Florida, P.O. Box 310, Starke, FL 32091.

Mr. Glenn Shealy, SMI Steel, P.O. Box 2005, Cayce-West Columbia, SC 29171

**Attachment 1
SMI Joist of Florida
Summary of Emission Data**

Year = 1999

Paint	VOC Content (Lbs/gal) ¹	HAP Content (Lbs/Gal) ¹	Total Paint Used (Gal) ²	VOC Emissions (Tons)	HAP Emissions Xylene (Tons)	HAP Emissions Ethyl Benzene (Tons)
Red Oxide	3.43	0	13937	23.90	0	0
Gray Oxide	3.40	0	31731	53.94	0	0
Bronze	3.40	0	21	0.04	0	0
Orange	3.40	0.53 Xylene 0.21 EB	640	1.09	0.17	0.07
Mineral Spirits	6.5	0	33755	109.70	0	0
TOTALs			82305	188.67	0.17	0.07

Year = 1998

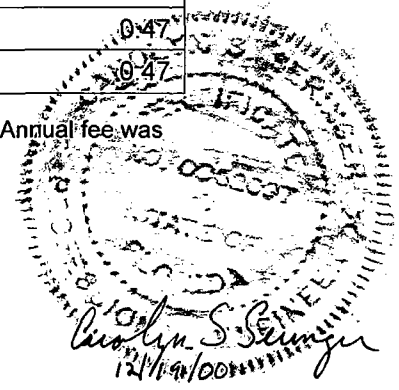
Paint	VOC Content (Lbs/gal) ¹	HAP Content (Lbs/Gal) ¹	Total Paint Used (Gal) ²	VOC Emissions (Tons)	HAP Emissions Xylene (Tons)	HAP Emissions Ethyl Benzene (Tons)
Red Oxide	3.40	0.22 Xylene	36641	62.29	4.03	0
Gray Oxide	3.40	0.22 Xylene	42977	73.06	4.73	0
Bronze	3.40	0.22 Xylene	3786	6.44	0.42	0
Orange	3.40	0.53 Xylene 0.21 EB	4437	7.54	1.18	0.07
Mineral Spirits	6.5	0	18865	61.31	0	0
TOTALs			109141	210.64	10.36	0

1998 Annual Operating Report Emissions (Tons) = 283 (This is an error, as explained in Response 1 in the attached letter. Annual fee was based on 210 tons of emissions.)

¹ VOC and HAP content in paint is obtained from the Material Safety Data Sheet.

² Total gallons of paint used is based on purchase records and inventory.

³ Total gallons of paint used is based on inventory and/or tons of joist produced, depending on the accuracy or availability of data.



**Attachment 1
SMI Joist of Florida
Summary of Emission Data**

Year = 1997

Paint	VOC Content (Lbs/gal) ¹	HAP Content (Lbs/Gal) ¹	Total Paint Used (Gal) ²	VOC Emissions (Tons)	HAP Emissions Toluene (Tons)
Red Oxide	3.40	0.33 Toluene	27451	46.67	4.53
Gray Oxide	3.40	0.33 Toluene	31122	52.91	5.14
Bronze	3.40	0.33 Toluene	607	1.03	0.10
Orange	3.40	0	193	0.33	0
Mineral Spirits	6.5	0	11295	36.71	0
TOTALs			82305	137.65	9.77

Year = 1996

Paint	VOC Content (Lbs/gal) ¹	HAP Content (Lbs/Gal) ¹	Total Paint Used (Gal) ³	VOC Emissions (Tons)	HAP Emissions Toluene (Tons)
Red Oxide	3.40	0.33 Toluene	23876	40.59	3.94
Gray Oxide	3.40	0.33 Toluene	28780	48.93	4.75
Mineral Spirits	6.5	0	3828	12.44	0
TOTALs			56484	101.96	8.69

Year = August - December 1995

No paint usage data available. Emissions calculated based on production. Startup of facility was in August of 1995 after purchase by SMI.

3033 TPY Joist Produced * 14 lbs VOC/Ton Joist/2000 lbs/ton = 21.23 tons of VOC emitted

¹ VOC and HAP content in paint is obtained from the Material Safety Data Sheet.

² Total gallons of paint used is based on purchase records and inventory.

³ Total gallons of paint used is based on inventory and/or tons of joist produced, depending on the accuracy or availability of data.

