

STATEMENT OF BASIS

Owen Joist Corp, a Division of CMC Steel Fabricators
SMI Joist of Florida, Inc.

Facility ID No.: 0070016
Bradford County

Title V Air Operation Permit Revision
PROPOSED Permit Project No.: 0070016-009-AV

Permit History

The initial Title V Air Operation Permit, No. 0070016-002-AV, was issued/effective on May 27, 1998. This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Under Air Construction Permit No. 0070016-004-AC, SMI Joist of Florida was permitted to construct six (6) additional paint dip tanks. Paint Tank Nos. 3 & 4 were installed July 1, 1998. Paint Tank No. 5 was installed November 1, 1998. Paint Tank No. 6 was installed January 31, 1997. Paint Tank Nos. 7 & 8 were not installed. The terms and conditions of Construction Permit No. 0070016-004-AC as they pertain to Paint Tank Nos. 3, 4, 5, and 6, were incorporated into the Title V Permit through this Title V Permit Renewal. The facility was authorized to construct Paint Tank Nos. 7 and 8 under the referenced construction permit up until its expiration date of February 6, 2005. Appendix CP-1, Compliance Plan, addressed the incorporation of these two tanks into the Title V Permit. However, the expiration date for the construction of Paint Tanks Nos. 7 and 8 passed, and the facility has decided not to construct the tanks at this time.

Title V Air Operation Permit Renewal No. 0070016-007-AV renewed Title V Air Operation Permit, No. 0070016-002-AV, incorporated Air Construction Permit No. 0070016-004-AC, issued on February 6, 2001, and established Appendix CP-1, Compliance Plan.

Title V Air Operation Permit Revision No. 0070016-009-AV

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. This permit also modifies Air Construction Permit No. 0070016-004-AC removing Paint Dip Tanks No. 7 and No. 8. This project will also modify the dimensions of Dip Tank #1.

Facility Description

SMI Joist of Florida manufactures longspan steel joists used as engineered structural members in support of roof decks in buildings. Raw steel materials (flat sections, angles, smooth rounds, etc.) are received either from truck trailers or via rail. The various components are welded together on-line using gas metal arc welding (GMAW) to form a joist. The joist is then moved down the production line where it is "bundled" with similar joists and lowered by crane into one of six dip tanks to allow for full paint coverage. The joists are placed over a run-off plate, which allows the excess paint to drip back into the tank. The joists are moved to the drying area. After air drying in ambient air, the joists are either loaded for shipping to the customer or stored for near-term shipping.

The majority of paint applied to the joists, by dipping, is primer paint, however, special orders require alternative and/or finish coating. In addition, touch-up painting may be required. An air-pressure spray gun is used for these types of finishes.

The paint dipping tanks are taken down for maintenance on an annual basis. All of the paint that is capable of being pumped is temporarily stored in drums and put back into the tank for re-use. The sludge and solid paint wastes are placed into drums for temporary storage prior to final removal from the facility.

Clean-up solvent is used where needed in the facility, but primarily in the dip tank area. It is used mainly for the cleanup of painting equipment (spray guns and lines, paint pumps, mixers, and storage totes). Clean-up solvent usage is limited to 400 gallons per calendar year.

Spray gun usage is limited to 2,500 gallons of coating per calendar year.

Secondary facility operations include a maintenance storeroom, workshop, steel decking storage and cutting building, and administrative offices.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the construction permit application received June 1, 2005, this facility is **NOT** a major source of hazardous air pollutants (HAPs).

Compliance Assurance Monitoring (CAM) does not apply to any of the Paint Dipping Tanks at this facility.

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