New Millennium Building Systems, LLC
Facility ID No.: 0230046
Columbia County

Initial Title V Air Operating Permit

Draft Permit No.: 0230046-003-AV

Permitting and Compliance Authority:

State of Florida
Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Telephone: 904/807-3300
FAX: 904/448-4363

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Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Jeb Bush
Governor

Colleen M. Castille
Secretary

Permittee:
New Millennium Building Systems, LLC
6115 County Road 42
Butler, Indiana 46721

Draft Permit No.: 0230046-003-AV
Facility ID No.: 0230046
SIC No(s).: 34
Project: Initial Title V Air Operation Permit

This permit is for the operation of a steel joist and metal coil surface coating facility. This facility is located at 1992 NW Bascom Norris Drive, Lake City, Columbia County, Florida; UTM Coordinate: Zone 17, 342.72 km East and 3340.64 km North; and, Latitude: 30°12'06" North and Longitude: 82°40'03" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212, 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 department and made a part hereof, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-5, TITLE V CONDITIONS version dated 03/28/05
Appendix A, NSPS Subpart A: General Provisions for 40 CFR 60 dated 7/9/02

Effective Date:
Renewal Application Due Date:
Expiration Date:

DRAFT

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK: anp

Cc: Sara Cupp-Environmental and Safety Manager, New Millennium Building Systems, LLC.
Stephen Alexander, P.E., Whitmer Environmental Services, Inc.

Section I. Facility Information.

Subsection A. Facility Description.

New Millennium manufacture steel joist, girders, bridging and decking.

Steel Decking Manufacturing (Emissions Unit 001). Raw steel coil is "uncoiled" and fed into the line where it passes through three (3) cleaning tanks, identified as the "Pre-Wash Tank," the "Wash Tank," and the "Rinse Tank." These tanks use heated water baths to remove the oily coating and surface impurities that are on the steel when it is received. Phosphoric acid cleaner is used to aid in cleaning the steel.

The steel is then fed through a rollcoater (RC1) that applies a surface preparation that promotes bonding of the paint and helps to prevent corrosion. The steel then passes through the first paint rollcoater (RC2) where paint is applied, and depending upon the job requirement, followed by a second rollcoater (RC3) for second paint application. After the paint rollcoaters, the steel may be coated with evaporative oil (EO), depending on the paint scenario. Edge Sealer (ES) may also be used as final rust protection measure.

Steel Joist Manufacturing (Emissions Unit 002). The facility receives steel into a warehouse area via railcar and truck. The accessories department slits the steel, then forms it into angle or channel shapes, which are the primary parts used on the joist lines to make joists and girders. Steel is assembled into a joist at the rigging area. The assembled joist is welded together and moved down by conveyor to the dip paint tank. This facility has four (4) dip paint tanks that vary in sizes. The table below shows the size of the tanks.

Dip Tank	Dimensions	Volume (gallon)
DT2	64' long, 2' wide, 4' deep	3,840
DT3	84' long, 2' wide, 5' deep	6,240
DT4	128' long, 2' wide, 8' deep	15,360
DT5	24' long, 3' wide, 3' deep	1,620

Once the joist is dipped and raised out of the paint tank, it is placed on a steel rack above the tank for a few minutes allowing the excess paint to drain back into the tank. Once the excess paint has drained off the joist, the joist is taken out of the building to the shipping yard. The facility will do regular on-site VOC testing (EPA Method 24) to determine the amount of Mineral Spirit (solvent) to be added to each paint tank to maintain a good working viscosity while at the same time minimizing paint usage.

Based on the Air Construction Permit Application received May 27, 2004, this facility is a major source of Volatile Organic Compounds (VOC).

Based on the initial Title V Air Operation Permit application received July 26, 2005, this facility is **not** a major source of hazardous air pollutants (HAPs).

CAM **does not** apply.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
001	Metal coil surface coating process
002	Dip tank coating process

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Appendix A-1: Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1: Permit History
Statement of Basis

These documents are on file with the permitting authority:
EPSAP Online Application for Initial Title V Air Permit- Long Form received July 26, 2005.
Additional Information Request dated August 2, 2005.
Additional Information Response received via EPSAP resubmission August 15, 2005.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-5, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-5, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. [Not federally enforceable.] General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

3. 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). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).
a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

and,
b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

- All four (4) dip tanks shall be equipped with a lid that covers the opening at the top of the tank. During non-production hours the lids shall be shut to reduce evaporation.
- The deck line paints will be stored in totes, drums or the above ground storage tank when not in use.
- All VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.
- Monthly accounting of each paint will be done to determine the amount used (emitted). The amount used shall be calculated by adding the beginning inventories to the deliveries less the ending inventories.

[Rule 62-296.320(1)(a), F.A.C., and Permit No. 0230046-001-AC]

7. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-5, TITLE V CONDITIONS):

The following requirements are "not federally enforceable":

a. Reduced speed for vehicular traffic.
b. Use of dust suppressants or wetting agents.
c. Use of paving or other asphaltic materials.
d. Covering of trucks, trailers, front end loaders and other vehicles or containers to prevent spillage of particulate matter during transport.
e. Use of hoods, fans, filters, and similar equipment to contain, capture and vent particulate matter.
f. Sprinkling or otherwise wetting or conveyor systems.
g. Enclosure or covering of conveyor systems.
h. Removal of particulate matter from paved roads and/or other paved areas by vacuum cleaning or wetting prior to sweeping.
i. Use of mulch, hydro seeding, grassing and/or other vegetative ground cover on barren areas to prevent or reduce particulate matter from being withdrawn.

[Rule 62-296.320(4)(c)2., F.A.C., and Permit No. 0230046-001-AC]

8. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

9. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-5, TITLE V CONDITIONS)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northeast District office.

Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way
Suite B200
Jacksonville, FL 32256
Telephone: 904/807-3300; Fax: 904/448-4363

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
001	Metal coil surface coating process

Emission Unit 001 consists of three (3) cleaning tanks; identified as the "prewash tank", the "wash tank", and the "rinse tank". This emissions unit also consists of three (3) rollcoaters, which are identified as rollcoater 1 (RC1), rollcoater 2 (RC2), and rollcoater 3 (RC3). Occasionally, the operations of this emissions unit also involve the use of evaporative oil (EO) and edge sealer (ES). Air emissions from this emissions unit are volatile organic compound (VOC).

{Permitting note(s): This emissions unit is regulated under 40 CFR 60-Subpart TT, Standard of Performance for Metal Coil Surface Coating adopted and incorporated by reference in Rule 62-204.800, F.A.C.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The VOC containing material usage shall be limited such that the facility wide VOC emissions do not exceed the permitted limit as specified in Common Condition C.1.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. Hours of Operation. The hours of operation of this emissions unit are not restricted, i.e. 8760 hours per year.
[Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.3. VOC Emissions: The VOC emissions from this emissions unit shall not exceed 0.28 kilogram VOC per liter (kg VOC/*l*) of coating solid applied for each calendar month.
{Permitting Note: kg/*l* = 2.336 lbs VOC/gal}
[40 CFR 60.462(a)(1)]

Test Methods and Procedures

A.4. Performance Test. The owner or operator shall conduct a performance test as required under 40 CFR 60.8(a) for each calendar month according to the procedures in this section.
[40 CFR 60.463 (b)]

A.5. Compliance Test Notification: At least 15 days prior to the date on which each formal compliance test is due to begin, the owner or operator shall provide written notification of the test to the Air Compliance Section of this Office. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company and telephone number of the person conducting the test.
[Rule 62-297.310(7)(a) 9., F.A.C.]

A.6. Monthly kg VOC/ l of Coating Solids Applied. The owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/*l* of coating solids applied:

The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Department may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the department.

(i) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month, except as provided under condition A.6. (iv). The weighted average of the total mass of VOC's used per unit volume of coating solids applied each calendar month is determined by the following procedures.

(A) Calculate the mass of VOC's used (Mo+Md) during each calendar month for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^{n} L_{ci} D_{ci} W_{oi} + \sum_{j=1}^{m} L_{dj} D_{dj} \qquad Equation\ 1$$

Where:
Md= the mass of VOC-solvent added to coatings (kilograms).
Mo= the mass of VOC's in coatings consumed, as received (kilograms).
Lc= the volume of each coating consumed, as received (liters).
Ld= the volume of each VOC-solvent added to coatings (liters).
Dc= density of each coating, as received (kilograms per liter).
Dd= density of each VOC-solvent added to coatings (kilograms per liter).
Wo= the proportion of VOC's in each coating, as received (fraction by weight).
n = the number of different coatings used during the calendar month, and

m = the number of different VOC solvents added to coatings used during the calendar month.
(ΣLdjDdj will be 0 if no VOC solvent is added to the coatings, as received)

(B) Calculate the total volume of coating solids used (Ls) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^{n} V_{si} L_{ci} \qquad Equation\ 2$$

Where:
Vs= the proportion of solids in each coating, as received (fraction by volume).
Lc= the volume of each coating consumed, as received (liters).
n = the number of different coatings used during the calendar month.

(C) Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s} \qquad \textit{Equation 3}$$

(ii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the calendar month for each affected facility by the following equation:

$$N = G \qquad \textit{Equation 4}$$

(iii) Where the volume-weighted average mass of VOC's discharged to the atmosphere per unit volume of coating solids applied (N) is equal to or less than 0.28 kg/*l*, the affected facility is in compliance.

(iv) If each individual coating used by an affected facility has a VOC content, as received, that is equal to or less than 0.28 kg/*l* of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.
[40 CFR 60.463(c)(1)]

A.7. Compliance Determination Method. Reference Method 24 in 40 CFR 60 Appendix A, except as provided under 40 CFR 60.8(b), or data provided by the formulator of the coating shall be used to determine compliance with Condition A.3. and for calculating the VOC content of each coating as applied to the surface of the metal coil.

In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24. The coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.
[40 CFR 60.466(a)(1) and (b)]

Monitoring of Operations

A.8. The owner or operator shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in specific condition A.6.
[40 CFR 60.464(a)]

Recordkeeping and Reporting Requirements

A. 9. Quarterly or Semiannual Report. The owner or operator shall identify, record, and submit a written report to the department every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under specific condition A.3. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the department semiannually.
[40 CFR 60.465 (c)]

A.10. The owner or operator shall record and maintain the data for each VOC containing material used at the facility for five (5) years. The data shall include at least the following but not limited to:

- Material usage for each calendar month.
- Monthly volume-weighted average emissions of VOC's in kg/*l* of coating solids applied according to procedures in specific condition A.6.
- Material VOC content specification sheet.
- VOC emissions summary for each calendar month.

[40 CFR 60.465(e) subsumed by Rule 62-213.440(1)(b), F.A.C.]

A.11. Emission factors and emissions calculation methods used to determine the data required in Specific Condition No. A.10. shall be consistent with those used in the air construction permit application submitted May 27, 2004.
[Rule 62-4.070, F.A.C.]

A. 12. The owner or operator shall comply with the applicable requirements of 40 CFR 60, Subpart A- General Provisions. Section 60.8(d) and (f) do not apply to the performance test.
[40 CFR 60.1 (a), 40 CFR 60.463(a)]

Subsection B. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
002	Dip Tank Coating Process

Emissions Unit 002 has four (4) dip paint tanks (DT2-DT5). Welded joist is lower into the dip paint tanks for coating. Mineral spirit (Solvent) is added to each paint tank from time to time to maintain the viscosity of the paint. Air emissions from this emissions unit are fugitive volatile organic compounds (VOC).

{Permitting note(s): This emissions unit is regulated under Rule 62-296.320, F.A.C., General Pollutant limiting Standard.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The VOC containing material usage shall be limited such that the facility wide VOC emissions do not exceed the permitted limit as specified in Common Condition C.1.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.2. Hours of Operation. The hours of operation of this emissions unit are not restricted, i.e. 8760 hours per year.
[Rule 62-210.200(PTE), F.A.C.]

Recordkeeping and Reporting Requirements

B.3. The owner or operator shall record and maintain the data for each VOC containing material used at the facility for five (5) years. The data shall include at least the following but not limited to:

- Monthly material usage
- Material VOC content specification sheet
- Monthly VOC emissions summary

[Rule 62-4.070, and 62-213.440, F.A.C.]

B.4. Emission factors and emissions calculation methods used to determine the data required in Specific Condition No. B.3. shall be consistent with those used in the air construction permit application submitted May 27, 2004.
[Rule 62-4.070, F.A.C.]

Subsection C. Common Conditions.

E.U. ID No.	Brief Description
-001	Metal Coil Surface Coating Process
-002	Dip Tank Coating Process

The following conditions apply to the emissions unit(s) listed above:

C.1. Facility Wide Allowable Air Emissions. The maximum allowable VOC emissions from this facility shall not exceed 249 tons each 12-consecutive month period.
[Rules 62-4.160(2), 62-210.200 (23), F.A.C., and Construction Permit No. 0230046-001-AC]

C.2. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7), F.A.C.]

Recordkeeping and Reporting Requirements

C.3. Reporting. A report of the data required by Specific Conditions A.10. and B.3. shall be submitted to the Northeast District Office on a semi-annual basis. All instances of deviations from permit requirements must be clearly identified in such reports. These reports shall be postmarked no later than the 60th day following the end of the reporting period defined below:

Reporting Period	Report Due Date
January - June	September 1
July – December	March 1

The annual operating report for that calendar year shall be submitted in lieu of the July-December semi-annual report.
[Rule 62-213.440(1)(b)3.a., F.A.C.]

C.4. Annual Operating Report. The owner or operator shall complete an Annual Operating Report (AOR) each year. The report shall be submitted to the Department by March 1 of the following year. The owner or operator shall submit the data required by specific conditions A.10. and B.3. with the AOR.
[Rule 62-210.370(3), F.A.C.]