

**Diversified Container Services, Inc.
Shipping Container Refinishing Operation
Facility ID No.: 0310333
Duval County**

Title V Air Operation Permit Renewal

DRAFT Permit Project No.: 0310333-004-AV

PERMITTING & COMPLIANCE AUTHORITY:
ENVIRONMENTAL RESOURCE MANAGEMENT DEPARTMENT
ENVIRONMENTAL QUALITY DIVISION
117 WEST DUVAL STREET, SUITE 225
JACKSONVILLE, FL 32202
TELEPHONE: (904) 630-4900
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Title V Air Operation Permit Renewal

DRAFT Permit No.: 0310333-004-AV

Table of Contents

<u>Section</u>	<u>Page Number</u>
Placard Page	1
I. Facility Information	2
A. Facility Description.	
B. Summary of Emissions Unit ID No(s). and Brief Description(s).	
C. Relevant Documents.	
II. Facility-wide Conditions	3 - 5
III. Emissions Unit(s) and Conditions	5 - 9
Emissions Unit 001 Shot Blasting Operation	
Emissions Unit 002 Spray Painting Operation	
Emissions Unit 003 Shot Blast Building	
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers	
Appendix B - Table 2 to Subpart MMMM of Part 63	
Appendix H-1, Permit History	
Appendix I-1, List of Insignificant Emissions Units and/or Activities	
Appendix LR-1, Local Rule Index	
Appendix TV-5, Title V Conditions version dated 03/28/05	
Table 1-1, Summary of Air Pollutant Standards and Terms	
Table 2-1, Summary of Compliance Requirements	

Permittee:

Diversified Container Services, Inc.
8831 Moncrief Dinsmore Road
Jacksonville, FL 32219

DRAFT Permit No.: 0310333-004-AV**Facility ID No.:** 0310333**SIC Nos.:** 34**Project:** Title V Air Operation Permit Renewal

This permit is for the operation of the Shipping Container Refinishing Operation. This facility is located at 8831 Moncrief Dinsmore Road, Jacksonville, Duval County; UTM Coordinates: Zone 17, 427.7 km East and 3364.9 km North; Latitude: 30° 24' 81" North and Longitude: 81° 45' 15" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (FS) and Florida Administrative Code (FAC) 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.

Referenced attachments made a part of this permit:

Appendix B - Table 2 to Subpart MMMM of Part 63

Appendix I-1, List of Insignificant Emissions Units and/or Activities

Appendix TV-5, Title V Conditions version dated 03/28/05

Effective Date:**Renewal Application Due Date:****Expiration Date:**

Environmental Resource Management Department
Environmental Quality Division

Ebenezer Gujjarlapudi, P.E.
Chief

EG/RR/rdr

S:/PermitV/ TVOP/D/0310333-004d-AV

Section I. Facility Information.

Subsection A. Facility Description.

This facility refinishes marine shipping containers. The refinishing operation consists of steel shot blasting and spray painting.

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

Based on the Title V Air Operation Permit Renewal application received October 5, 2005, this facility is a major source of hazardous air pollutants (HAPs).

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

<u>E.U. ID No.</u>	<u>Brief Description</u>	<u>Control Technology</u>
001	Shot Blasting Operation	Hoffman Model DFT3-24 Dust Collector
002	Spray Painting Operation	Low Solvent Coating Technology
003	Shot Blast Building	Pangborn Baghouse Dust Collector Model Number 120HP1015 TH

Note: Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

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

Appendix LR-1, Local Rule Index

These documents are on file with permitting authority:

Title V Permit Renewal Application received October 5, 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 one copy when requested or otherwise appropriate. }

2. 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.
3. 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; 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), FAC.[40 CFR 68.]
4. 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 installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1)(a), FAC, and Rule 2.1001, JEPB]
5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), FAC, and Rules 2.501 and 2.1301, JEPB.]
6. 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., FAC, and Rule 2.1001, JEPB]
7. Permittee shall notify the Environmental Quality Division (Department) fifteen (15) days prior to Emissions Unit testing.
[Rule 62-297.310(7)(a)9., FAC, and Rule 2.1101, JEPB]
8. Control equipment shall be provided with a method of access that is safe and readily accessible.
[Rule 62-297.310(6), FAC, and Rule 2.1101, JEPB]

9. Testing of emissions shall be conducted with the Emissions Unit operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then Emissions Units may be tested at less capacity; in this case subsequent Emissions Unit operation is limited to 110 percent of the test load until a new test is conducted. Once the Emissions Unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
[Rule 62-297.310(2), FAC, and Rule 2.1101, JEPB]
10. Copies of the test report(s) shall be submitted to the Department within forty-five (45) days of completion of testing.
[Rule 62-297.310(8)(b), FAC, and Rule 2.1101, JEPB]
11. 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, FAC and Rule 2.501, JEPB]
12. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., FAC, shall be submitted within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), FAC.
[Rules 62-213.440(3) and 62-213.900, FAC, and Rule 2.501, JEPB]
13. Excess emissions resulting from startup, shutdown, or malfunction of any emission unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Permitting Authority in accordance with Rule 62-4.130, FAC and Rule 2.1301, JEPB. A full written report on the malfunctions shall be submitted to the Permitting Authority in a quarterly report, if requested by the Permitting Authority.
[Rule 62-210.700, FAC, and Rule 2.201, JEPB]
14. 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

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

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

16. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. The permittee shall report in accordance with the requirements of Rule 62-210.700(6), FAC, Rule 62-4.130, FAC, Rule 2.201, JEPB, and Rule 2.1301, JEPB, deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), FAC, and Rule 2.501, JEPB. Unless otherwise specified in **a permit, rule, or order**; reports shall cover the period of January through June (report due on or before September 1) and July through December (report due on or before March 1).
[Rule 62-213.440(1)(b)3., FAC, and Rule 2.501, JEPB]

The following Facility-wide conditions are not federally enforceable

17. 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]
18. The facility shall be subject to the City of Jacksonville Ordinance Code, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 376 [Odor Control], and JEPB Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice].
19. The facility shall be subject to JEPB Rule 2, Parts I through VII, and Parts IX through XIII.

Section III. Emissions Unit(s) and Conditions.

Emissions Unit No. 001 – Shot Blasting Operation

Emissions Unit Description - The steel shot blasting operation is conducted in a fully enclosed building with a dust collector.

Particulate matter (PM) control device: Hoffman Model DFT3-24 Dust Collector

Essential Potential to Emit (PTE) Parameters

1. This emissions unit is allowed to operate 2,600 hours per year.
[Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]
2. The nominal volumetric flow rate from this emissions unit is 13,300 cubic feet per minute.
[Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. PM emissions shall not exceed 0.03 grains per dry standard cubic foot, 3.42 pounds per hour, and 4.45 tons per year.
[Rule 62-296.712(2), FAC, and Rule 2.1001, JEPB]
4. Visible emissions (VE) shall not exceed 5 percent opacity.
[Rule 62-296.712(2), FAC, and Rule 2.1001, JEPB]

Test Methods and Procedures

5. Testing for demonstration of compliance upon request shall be performed in accordance with EPA Reference Method (RM) 5 (as described in 40 CFR 60, Appendix A) for particulate matter.
[Rule 62-297.310(4), FAC, and Rule 2.1101, JEPB.]
6. Testing for demonstration of compliance shall be performed in accordance with EPA RM 9 (as described in 40 CFR 60, appendix A) for the visual determination of opacity.
[Rule 62-297.310(4)(a)2., FAC, and Rule 2.1101, JEPB]
7. VE shall be tested annually from the date of September 1, 2005.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

Emissions Unit No. 002 - Spray Painting Operation

Emissions Unit description - Surface coating of marine shipping containers

Essential Potential to Emit (PTE) Parameters

1. Shipping containers processed shall not exceed a maximum of 2000 per year.
[Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]
2. This emissions unit is allowed to operate 2,600 hours per year.
[Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]

Emissions Limitations and Standards

3. 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]
4. The maximum allowable VOC emissions from this emissions unit shall not exceed 44.87 tons per year.
[Rule 62-296.500(2)(a), FAC, and Rule 2.1001, JEPB]
5. Diversified Container Services, Inc. shall comply with the provisions of 40 CFR 63, Subpart M – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, and 40 CFR 63, Subpart A – General Provisions (as described in Appendix B to Subpart M of Part 63 – General Provisions of Applicability to Subpart M).
6. For an existing affected source, you (Diversified Container Services, Inc.) must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit as follows:
 - a. For each existing general use coating affected source, limit organic HAP emissions to no more than 2.6 pound organic HAP per gallon coating solids used during each 12-month compliance period.
 - b. For each existing high performance coating affected source, limit organic HAP emissions to no more than 27.5 pounds organic HAP per gallon coating solids used during each 12-month compliance period.
 - c. For each existing magnet wire coating affected source, limit organic HAP emissions to no more than 1.0 pound organic HAP per gallon coating solids used during each 12-month compliance period.
 - d. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to no more than 37.7 pounds organic HAP per gallon coating solids used during each 12-month compliance period.
 - e. For each existing extreme performance fluoropolymer coating affected source, limit organic HAP emissions to no more than 12.4 pounds organic HAP per gallon coating solids used during each 12-month compliance period.
[40 CFR 63.3890, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

7. 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]

Test Methods and Procedures

8. Testing for demonstration of compliance shall be performed in accordance with Environmental Protection Agency (EPA) Reference Method (RM) 24 (as described in 40 CFR 60, Appendix A) for volatile organic compounds. Manufacturers data sheets with VOC and HAP contents may be substituted with the approval of the Department.
[Rule 62-296.513(4), FAC, and Rule 2.1001, JEPB]
9. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limits in 40 CFR 63.3890 and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to this section. Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in 40 CFR 63.3892 and 63.3893, respectively.
[40 CFR 63.3941, Rule 62-204.800, FAC, and Rule 2.201, JEPB]
10. Calculate the organic HAP content, pounds of organic HAP emitted per gallon coating solids used, of each coating used during the compliance period using the following equation:

$$H_C = \frac{(D_C)(W_C)}{V_s}$$

Where:

H_C = Organic HAP content of the coating, pound organic HAP emitted per gallon coating solids used.

D_C = Density of coating, pound coating per gallon coating, determined according to paragraph 40 CFR 63.3941(c).

W_C = Mass fraction of organic HAP in the coating, pound organic HAP per pound coating, determined according to paragraph 40 CFR 63.3941(a).

V_s = Volume fraction of coating solids, gallon coating solids per gallon coating, determined according to according to paragraph 40 CFR 63.3941(b).

[40 CFR 63.3941, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

11. The compliance date for this operation with the provisions of 40 CFR 63, Subpart MMMM shall be January 2, 2007.
[40 CFR 63.3883(c)(2), Rule 62-204.800, FAC, and Rule 2.201, JEPB]
12. Diversified Container Services, Inc. must complete the initial compliance demonstration according to the requirements in 40 CFR 63.3941 during the initial compliance period. The initial compliance period begins on the date 3 years after the date of January 2, 2004 and ends on the last day of the 12th month following the compliance date.
[40 CFR 63.3940, Rule 62-204.800, FAC, and Rule 2.201, JEPB]
13. Procedures for demonstration of continuous compliance using the compliant material option shall be in accordance with the requirements in 40 CFR 63.3942.
[40 CFR 63.3942, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Recordkeeping and Reporting Requirements

14. Records shall be maintained monthly for the following:

- a. Amount of coating applied
- b. VOC content (lbs/gal) of coatings as applied
- c. Amount of surface preparation, clean-up and wash-up solvent / thinner usage
- d. VOC content of solvent / thinner
- e. VOC emissions
- f. Hazardous air pollutants (HAP) content of coatings and solvents
- g. HAP emissions
- h. Number of containers processed

Records shall be maintained for a minimum of five (5) years and made available to the Department upon request.

[Rule 62-296.500(2), FAC, Rule 62-213.440(1)(b), FAC, and Rule 2.1001, JEPB]

15. Quarterly reports shall be submitted to the Department describing the usage of solvents, coatings, and VOC/HAP contents and emissions. The quarterly reports shall be submitted by the 30th day of the following month after the end of each quarter (January - March, April - June, July - September, and October - December). The final report, which is due by the 30th of January for the quarter of October - December, shall include a synopsis of the preceding year.
[Rule 62-213.440(1)(b), FAC, and Rule 2.501, JEPB]
16. Diversified Container Services, Inc. must submit the notification of compliance status no later than 30 calendar days following the end of the initial compliance period.
[40 CFR 63.3910, Rule 62-204.800, FAC, and Rule 2.201, JEPB]
17. Diversified Container Services, Inc. must submit semiannual compliance reports for each affected source as described in 40 CFR 63.3920.
[40 CFR 63.3920, Rule 62-204.800, FAC, and Rule 2.201, JEPB]
18. Diversified Container Services, Inc. must collect and keep records of the data and information specified in 40 CFR 63.3930. Failure to collect and keep these records is a deviation from the applicable standard.
[40 CFR 63.3930, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Emissions Unit No. 003 – Shot Blast Building

Emissions Unit Description - The steel shot blasting operation is conducted in a fully enclosed building with a dust collector.

PM control device: Pangborn Baghouse Dust Collector Model Number 120HP1015 TH

Essential Potential to Emit (PTE) Parameters

1. This emissions unit is allowed to operate 2,080 hours per year.
[Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]
2. The nominal volumetric flow rate from this emissions unit is 11,000 cubic feet per minute.
[Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. PM emissions shall not exceed 0.03 grains per dry standard cubic foot, 2.83 pounds per hour, and 2.94 tons per year.
[Rule 62-296.712(2), FAC, and Rule 2.1001, JEPB]
4. VE shall not exceed 5 percent opacity.
[Rule 62-296.712(2), FAC, and Rule 2.1001, JEPB]

Test Methods and Procedures

5. Testing for demonstration of compliance upon request shall be performed in accordance with EPA RM 5 (as described in 40 CFR 60, Appendix A) for particulate matter.
[Rule 62-297.310(4), FAC, and Rule 2.1101, JEPB.]
6. Testing for demonstration of compliance shall be performed in accordance with EPA RM 9 (as described in 40 CFR 60, Appendix A) for the visual determination of opacity.
[Rule 62-297.310(4)(a)2., FAC, and Rule 2.1101, JEPB.]
7. VE shall be tested annually from the date of September 1, 2005.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]