Chancey Metal Products, Inc.
Metal Fabrication Facility
Facility ID No.: 0310341
Duval County

Initial Title V Air Operation Permit

PROPOSED Permit No.: 0310341-006-AV

PERMITTING & COMPLIANCE AUTHORITY:
ENVIRONMENTAL RESOURCE MANAGEMENT DEPARTMENT
ENVIRONMENTAL QUALITY DIVISION
117 WEST DUVAL STREET, SUITE 225
JACKSONVILLE, FL 32202
TELEPHONE: (904) 630-4900
FAX: (904) 630-3638

Initial Title V Air Operation Permit
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Permittee:
Chancey Metal Products, Inc.
Metal Fabrication Facility
5130 Sunbeam Road
Jacksonville, Fl 32257

PROPOSED Permit No.: 0310341-006-AV
Facility ID No.: 0310341
SIC Nos.: 34
Project: Initial Title V Air Operation Permit

This permit is for the operation of a metal fabrication facility. This facility is located at 5130 Sunbeam Road, Jacksonville, Duval County, FL 32257; UTM Coordinates: Zone 17, 444.170 km East and 3341.560 km North; Latitude: 30° 12' 21" North and Longitude: 81° 34' 48" West.

This Title V Air Operation Permit 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 Environmental Resource Management Department, Environmental Quality Division (Department), 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: June 1, 2010
Expiration Date: November 30, 2010

Environmental Resource Management Department
Environmental Quality Division

_____
Ebenezer Gujjarlapudi, P.E.
Chief

EG/RR/rdr

S:/PermitV/ TVOP/P/0310341-006k-AV

Section I. Facility Information.

Subsection A. Facility Description.

This facility manufactures and coats ornamental and architectural metal products. Metal staircases, gates, fences, railing, window bars and architectural components are manufactured that require the application of high performance primers and coatings. The facility includes a paint spray booth, a powder coating booth, and a powder coating curing oven. Particulate Matter (PM) is removed from exhausted air with a dry filter prior to discharge to the atmosphere.

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

Based on the Initial Title V Air Operation Permit application received June 16, 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).

E.U. ID No.	Brief Description	Control Device
001	Paint Spray Booth	Paint Arrestor Filter
002	Powder Coating Booth	
003	Powder Coating Curing Oven	

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:
Initial Title V Permit Application received June 16, 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.

   - Application of water to paved and unpaved areas accommodating vehicular traffic, as necessary.
   - Daily removal of particulate matter from buildings or work areas. The collected particulate matter shall be transferred to a trash bin in a manner so that it will not become airborne.
   - Enclosure or covering of activities or equipment where necessary.
   - Fiber filters shall be used on all exhaust fans that vent to the atmosphere. The filters shall be changed (replaced) as necessary to ensure proper ventilation.
   - Unconfined particulate matter emissions from trimming and other similar activities such as: cutting, shaping, and sanding operations performed by hand tools and tabletop equipment shall, in general be controlled by portable “shop-vac” vacuum collectors and normal “good housekeeping” procedures.
   - Normal production cutting and trimming shall be performed in the trim booths. The exhaust fan and water bath air cleaner serving the trim rooms shall be operating during all trimming and grinding operations.

   [Rule 62-296.320(4)(c)2., FAC, and Rule 2.1001, JEPB.]

7. 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.]

8. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., FAC, 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), FAC. {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-4, Title V Conditions)}
[Rules 62-213.440(3) and 62-213.900, FAC, and Rule 2.501, JEPB]

9. 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]

10. 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

11. 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

The following Facility-wide conditions are not federally enforceable

12. 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.]

13. 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].

14. 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.

Emission Unit No. 001-Paint Spray Booth

Emission Unit Description – Paint is applied to fabricated metal parts.

Control Device – Paint booth is equipped with a Binks Model 14-10 bridge type exhaust chamber to remove paint over spray.

Essential Potential to Emit (PTE) Parameters

1. Coatings (as applied) shall not exceed 150 gallons per day and 54,750 gallons per calendar year.
   [Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]

2. This EU shall be allowed to operate continuously; i.e.: 8760 hours per year.
   [Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. Chancey Metal Products, Inc. shall comply with the provisions of 40 CFR 63, Subpart MMMM – 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 MMMM of Part 63 – General Provisions of Applicability to Subpart MMMM).

4. 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)3., FAC, and Rule 2.1001, JEPB]

5. The paint spray booth shall not be operated unless all exhaust air passes through the paint arrestor filters.
   [Rule 62-210.650, FAC, and Rule 2.301, JEPB]

6. For an existing affected source, you 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]

Test Methods and Procedures

7. 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.
[Rule 62-296.500(2)(b)4, FAC and Rule 2.1001, JEPB]

8. 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]

9. 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, kg organic HAP emitted per liter (gal) coating solids used.
D_C = Density of coating, kg coating per liter (gal) coating, determined according to paragraph (c) of this section.
W_C = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to paragraph (a) of this section.
V_S = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to paragraph (b) of this section.
[40 CFR 63.3941, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

10. The compliance date for this operation shall be January 2, 2007.
[40 CFR 63.3883(c)(2), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

11. Chancey Metal Products, 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]

12. 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

13. Records shall be kept on a monthly basis for the following:
    a. The amount and type of coating applied
    b. VOC and HAP content (lbs/gal) of coatings as applied
    c. The amount and type of solvents used (including clean-up solvents)
    d. Total VOC and HAP emissions

Records shall be maintained on file for a minimum period of five (5) years and shall be made available to the Department upon request.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

14. 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]

15. Chancey Metal Products, 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]

16. Chancey Metal Products, 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]

17. Chancey Metal Products, 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]

Emission Unit No. 002-Powder Coating Booth

Emission Unit Description – Powder coating is applied to fabricated metal parts.

Control Device – Powder coating booth is equipped with a Binks Model 14-10 bridge type exhaust chamber paint filter for particulate matter control

Essential Potential to Emit (PTE) Parameters

1. Powder coatings (as applied) shall not exceed 110 pounds per day.
[Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]

2. This EU shall be allowed to operate continuously; i.e.: 8760 hours per year.
[Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. Visible emissions shall not exceed 5% opacity.
[Rule 62-4.070(3), FAC and Rule 2.1201, JEPB]

Test Methods and Procedures

4. 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.
[Rule 62-297.310(4)(a)2, FAC and Rule 2.1101, JEPB]

Recordkeeping and Reporting Requirements

5. Records shall be maintained daily for the following:
    a. The amount of powder coating applied
    b. The amount and type of solvents used (including clean-up solvents)

   Records shall be maintained on file for a minimum period of five (5) years and shall be made available to the Department upon request.
   [Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

Emission Unit No. 003-Powder Coating Curing Oven

Emission Unit Description – High temperature curing oven fired with liquid petroleum gas (LPG).

Essential Potential to Emit (PTE) Parameters

1. The maximum heat input to the oven shall not exceed 1.2×10^6 Btu per hour of LPG.
   [Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]

2. This EU shall be allowed to operate continuously; i.e.: 8760 hours per year.
   [Rule 62-210.200(203), FAC, and Rule 2.301, JEPB

Emission Limitations and Standards

3. Visible emissions shall not exceed 5% opacity.
   [Rule 62-4.070(3), FAC and Rule 2.1201, JEPB]

Test Methods and Procedure

4. Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA RM 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.
   [Rule 62-297.310(4)(a)2., FAC, and Rule 2.1101, JEPB]