CDR Systems Corporation
Hot Box Enclosures
Facility ID No.: 0310530
Duval County

Initial Title V Air Operation Permit

PROPOSED Permit No.: 0310530-002-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:
CDR Systems Corporation
Hot Box Enclosures
924 North Lane Avenue
Jacksonville, Fl 32254

PROPOSED Permit No.: 0310530-002-AV
Facility ID No.: 0310530
SIC Nos.: 30
Project: Initial Title V Air Operation Permit

This permit is for the operation of a fiberglass manufacturing operation. This facility is located 924 North Lane Avenue, Jacksonville, Duval County, FL; UTM Coordinates: Zone 17, 427.64 km East and 3355.93 km North; Latitude: 30° 20' 05" North and Longitude: 81° 45' 10" 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 I-1, List of Insignificant Emissions Units and/or Activities
Appendix TV-5, TITLE V CONDITIONS version dated 03/28/05
Table 15 to Subpart WWWW of Part 63

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/P/0310530-002k-AV

Section I. Facility Information.

Subsection A. Facility Description.

This facility manufactures fiberglass, metal and insulation products. Enclosures are manufactured to protect and insulate water utility systems equipment such as valves, pumps and backflow devices. Operations consist primarily of a lamination/gel coating area, grinding/trimming booths, metal fabrication shop, and expanding foam application booth. Fiberglass and resin are applied by hand or (primarily) spray layup techniques.

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

Based on the Title V Air Operation Permit Renewal application received January 27, 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
001	Fiberglass Products Manufacturing

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 January 27, 2005
Additional information request dated February 15, 2005
Additional information response received March 3, 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. 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), FAC, and Rule 2.501, JEPB]

9. 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]

10. 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]

11. 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]

12. 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

13. 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

14. 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.]

15. 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].

16. 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- Fiberglass Products Manufacturing

Emission Unit Description – Enclosures are manufactured to protect and insulate water utility systems equipment. Operations consist primarily of a lamination/gel coating area, grinding/trimming booths, metal fabrication shop, and expanding foam application booth. Fiberglass and resin are applied by hand or (primarily) spray layup techniques.

Essential Potential to Emit (PTE) Parameters

1. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(203), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. 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]

3. CDR Systems Corporation shall comply with the provisions of 40 CFR 63, Subpart WWWW – National Emission Standards Hazardous Air Pollutants: Reinforced Plastic Composites Production, and 40 CFR 63, Subpart A – General Provisions (as described in Table 15 to Subpart WWWW of Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW of Part 63.

4. Organic HAP emissions shall not exceed the following:

	Emissions Limit 12-Month Rolling Average lbs/ton	Compliant Resin or Gel Coat Content lbs/ton
Open Mold – Mechanical Resin Application	87	38.4
Open Mold – Manual Resin Application	87	33.6
Open Mold – Gel Coat Application	377	37.0

[40 CFR 63.5805(a), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

5. CDR Systems Corporation shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
[40 CFR 63.5805(a), Table 4 – Work Practice Standards, Subpart WWWW, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

6. CDR Systems Corporation shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
[40 CFR 63.5805(a), Table 4 – Work Practice Standards, Subpart WWWW, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Test Methods and Procedures

7. Compliance with organic HAP emissions limits is demonstrated by maintaining a organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Tables 3, or 5 to 40 CFR 63, Subpart WWWW, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats meet the appropriate organic HAP emissions limits.
[40 CFR 63.5900, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Recordkeeping and Reporting Requirements

8. CDR Systems Corporation shall demonstrate initial compliance by submitting certified statements for existing cleaning operations and existing HAP containing materials storage operations as required by the applicable provisions of Table 9 to Subpart WWWW.
[40 CFR 63.5860(a), Table 9 – Initial Compliance with Work Practice Standards, Subpart WWWW, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

9. CDR Systems Corporation shall submit Notification of Compliance Status no later than 1 year plus 30 days after your facility's compliance date of April 21, 2006.
[40 CFR 63.5905(a), Table 13 – Applicability and Timing of Notifications, Subpart WWWW, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

10. CDR Systems Corporation shall submit a semi-annual compliance report with the applicable provisions of Table 14 to Subpart WWWW.
[40 CFR 63.5910, Table 14 – Requirements for Reports, Subpart WWWW, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

11. Records shall be kept on a monthly basis for the following:

a. The amount (ton) of gel coats and resins applied
b. VOC content (lbs/ton) of gel coats and resins as applied
c. The amount (gal) and type of solvents used (including clean-up solvents)
d. VOC content (lbs/gal) of solvents as applied/used
e. HAP content of gel coats (lbs/ton), resins (lbs/ton) and solvents (lbs/gal) as applied/used
f. Total VOC emissions (tons/month)
g. Total and individual HAP emissions (tons/month)

Records shall be maintained on file for a minimum period of five (5) years and shall be made available to the Department upon request.
[40 CFR 63.5915, 40 CFR 63.5920, Rule 62-204.800, FAC, and Rule 2.201, JEPB]