

PRIDE Enterprises  
Union Correctional Facility  
Facility ID No.: 1250007  
Union County

**Title V Air Operation Permit Revision**

**PROPOSED Permit No.: 1250007-006-AV**

Permitting and Compliance Authority:  
Department of Environmental Protection  
Northeast District Air Program  
7825 Baymeadows Way, Suite B-200  
Jacksonville, Florida 32256-7590  
Telephone: 904/807-3300  
Fax: 904/448-4363

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## Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen Castille  
Secretary

**Permittee:**

PRIDE Enterprises  
12425 28<sup>th</sup> Street North  
St. Petersburg, Florida 34620

**PROPOSED Permit No.:** 1250007-006-AV

**Facility ID No.:** 1250007

**SIC Nos.:** 34

**Project:** Title V Air Operation Permit Revision

The purpose of this permit is to revise the expiration date of the Title V Air Operation Permit. Since the facility has changed the operation of both the license tag and the metal furniture manufacturing plants, the potential emissions have been reduced. As a result, PRIDE is no longer a major source of HAPs or a Title V major source. As such, the Department will issue the expiration of the Title V Air Operation Permit and issue a Federally Enforceable State Operating Permit (FESOP) concurrently. Upon receipt of the FESOP permit, the facility will not be subject to the following regulations upon the respective compliance dates: National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subpart MMMM, Surface Coating of Metal Parts and Products, or NESHAP 40 CFR 63 Subpart RRRR, Surface Coating of Metal Furniture.

This existing facility is located at State Road 16, Raiford, Union County, Florida; UTM Coordinates: Zone 17, 384.9 km East and 3326.6 km North; Latitude: 30° 03' 26" North and Longitude: 82° 11' 38" West.

This Title V Air Operation Permit Revision 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.

**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

40 CFR 60 Subpart A

**Initial Effective Date:** October 27, 2003

**Revision Effective Date:**

**Expiration Date:**

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

CLK: anp

## **Section I. Facility Information**

### **Subsection A. Facility Description.**

Union Correctional Facility is a metal furniture manufacturing plant and an automobile license tag manufacturing plant. Both operations involve the application of coating - spraying the furniture, and dipping the license tags.

At the Tag Plant, aluminum stock is uncoiled, cleaned, cut and embossed prior to being coated with clear coat in a dipping tank. Once coated, the tags are placed in a static oven followed by the drying oven (EP 02). Ink is then applied followed by another drying process in the ink drying oven (EP 03).

At the Metal Furniture Plant, sheet, coil or angle steel stock is sheared, cut, punched, and formed prior to being cleaned. The metal parts are then sent to the spray coating application process (controlled by paint spray booths EP 04 and 05) prior to curing process in the paint bake oven (EP 06), and final assembly. Because of the modification proposed in air construction permit No. 1250007-002-AC, this operation has to comply with the New Source Performance Standards (NSPS) regulations of 40 CFR 60, Subpart EE.

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

Based on the Title V Air Operation Permit Renewal application received April 21, 2003, this facility is a major source of hazardous air pollutants (HAPs).

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

<b><u>E.U. ID No.</u></b>	<b><u>E. Point ID No.</u></b>	<b><u>Brief Description</u></b>
001		Tag Printing/Coating Operation
	01	Tag Clear coat Dipping Tank and Ink Application Area
	02	Tag Clear Coat Natural Gas-Fired Drying Oven
	03	Tag Ink Natural Gas-Fired Drying Oven
002		Metal Furniture
	04	Metal Furniture Spray Paint Booth #1
	05	Metal Furniture Spray Paint Booth #2
	06	Metal Furniture Natural Gas-Fired Bake Oven

***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:

Tables 1-1 and 1-2, Summary of Air Pollutant Standards and Terms

Tables 2-1 and 2-2, 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 permitting authority:

Revised Title V Air Operation Permit issued October 27, 2003.

Application for Federally Enforceable State Operating Permit (FESOP) received May 19, 2005.

Application for Title V Air Operation Permit Revision received July 18, 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 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.; and Permit No. 1250007-002-AC]

**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.

- a. Maintain tightly fitting covers, lids, etc. on all containers of VOC when they are not being handled, tapped, etc.
- b. Where possible and practical, procure/fabricate a tight fitting cover for any open trough, basin, bath, etc. of VOC so that it can be covered when not in use.
- c. All fittings, valves, lines, etc. shall be properly maintained.
- d. All VOC spills shall be attended to immediately and the materials properly disposed of, recycled, etc.
- e. The permittee shall investigate and apply the use of low solvent technology for reducing VOC emissions as it becomes available.

[Rule 62-296.320(1)(a), F.A.C.; and Permit No. 1250007-002-AC]

**7. Emissions of Unconfined Particulate Matter.** Pursuant to Rule 62-296.320(4)(c), F.A.C., and the application, this facility has **no** emissions of unconfined particulate matter (see Condition 57. of APPENDIX TV-5, TITLE V CONDITIONS).

[Rule 62-296.320(4)(c)2, F.A.C.; and, Renewal Title V permit application received April 21, 2003]

**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-4, 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 B-200  
Jacksonville, Florida 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 units.**

<b><u>E.U. ID No.</u></b>	<b><u>E. Point ID No.</u></b>	<b><u>Brief Description</u></b>
001		Tag Printing/Coating Operation
	01	Tag Clear coat Dipping Tank and Ink Application Area
	02	Tag Clear Coat Natural Gas-Fired Drying Oven
	03	Tag Ink Natural Gas-Fired Drying Oven

This emissions unit has three (3) pieces of equipment that produces emissions: (1) dipping tank with an applications area; and (2) uncontrolled, natural gas fired ovens. Emissions from the ovens consist of the combustion products of natural gas and VOC emissions released during the drying processes. The dipping tank with an applications area is used to apply clear coating to the embossed automobile license tags.

This emission unit is regulated under Rule 62-296.320, F.A.C, for VOC emissions and odors.

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

**Essential Potential to Emit (PTE) Parameters**

**A.1. Hours of Operation.** The hours of operation for the emissions unit shall not exceed 8760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

**A.2.** The emissions unit is also subject to conditions **C.1** through **C.4**.

**Subsection B. This section addresses the following emissions units.**

<u>E.U. ID No.</u>	<u>E. Point ID No.</u>	<u>Brief Description</u>
002		Metal Furniture
	04	Metal Furniture Spray Paint Booth #1
	05	Metal Furniture Spray Paint Booth #2
	06	Metal Furniture Natural Gas-Fired Bake Oven

This emissions unit has three (3) pieces of equipment that produces emissions: (2) paint spray booths; and (1) uncontrolled, natural gas fired oven. Both paint spray booths (each with an andreae filter to collect paint particulate matter), use high volume low pressure (HVLP) paint delivery system. The oven (EP06) is a single pass, conveyor oven used to bake enamel onto the metal furniture. Emissions from the oven consist of the combustion products of natural gas and VOC emissions released during the drying processes.

This emissions unit is regulated under: NSPS - 40 CFR 60, Subpart EE, Standards of Performance for Surface Coating of Metal Furniture, 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**

**B.1. Hours of Operation.** The hours of operation for this emissions unit shall not exceed 8760 hours/year.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

**Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.2. Volatile Organic Compounds.** The discharge of VOC emission into the atmosphere from the metal furniture surface painting operation shall not exceed 0.90 kilogram of VOC per liter of coating solids applied.  
[40 CFR 60.312(a)]

**B.3.** The HVLP spray guns shall be operated with an atomizing air pressure of 10 pounds per square inch gauge (psig) or less at the air cap to achieve 60% transfer efficiency.  
[Air construction permit No. 1250007-002-AC]

**Test Methods and Procedures**

{Permitting note: Table 2-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.4. Volatile Organic Compounds – Compliance:** The owner or operator shall conduct a performance test each calendar month according to the procedures in Specific Condition **B.5.** [40 CFR 60.313(b)]

**B.5. Volatile Organic Compounds – Volume-weighted Average Emissions.** The owner or operator shall use the following procedures and those in Specific Condition **B.6.** for determining monthly volume-weighted average emissions of VOC's in kilograms per liter of coating solids applied:

- (1) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for the surface coating operation. Each monthly calculation is considered a performance test. Except as provided in Specific Condition **B.5(4)**, the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied each calendar month will be determined by the following procedures.

- (i) Calculate the mass of VOC's used during each calendar month for by the following equation:

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

( $\sum L_{dj} D_{dj}$  will be 0 if no VOC solvent is added to the coatings, as received.)

Where:

( $M_o + M_d$ ): the mass of VOCs used

$M_d$ : the mass of diluent VOC-solvent consumed (kilograms)

$M_o$ : the mass of VOC's in coatings consumed, as received (kilograms)

$L_{ci}$ : the volume of coating i consumed, as received (liters)

$L_{dj}$ : the volume of diluent j VOC-solvent added to coatings (liters)

$D_{ci}$ : density of coating i, as received (kilograms per liter)

$D_{dj}$ : density of diluent j VOC-solvent (kilograms per liter)

$W_{oi}$ : the proportion of VOC's in coating i (or input stream), as received (fraction by weight)

n: the number of different coatings used during the calendar month and

m: the number of different diluent VOC-solvents used during the calendar month.

**Specific Condition B.5. continued:**

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

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

Where:

- $L_s$ : the total volume of coating solids used  
 $L_{ci}$ : the volume of coating i consumed, as received (liters)  
 $V_{si}$ : the proportion of solids in coating i (or input stream), as received (fraction by volume)  
n: the number of different coatings used during the calendar month.

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

$$G = \frac{M_o + M_d}{L_s T}$$

Where:

- G: the volume-weighted average mass of VOCs consumed per unit of volume of coating solids applied.  
 $M_d$ : the mass of diluent VOC-solvent consumed (kilograms)  
 $M_o$ : the mass of VOC's in coatings consumed, as received (kilograms)  
 $L_s$ : the total volume of coating solids used  
T: the transfer efficiency with high volume low pressure (HVLP) sprayers, 60%.

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

$$N=G$$

Where:

- N: the volume-weighted average of VOC emissions to the atmosphere  
G: the volume-weighted average mass of VOCs consumed per unit of volume of coating solids applied.

- (3) Where the volume-weighted average mass of VOC discharged to the atmosphere per unit volume of coating solids applied is less than or equal to 0.90 kilogram per liter, the affected facility is in compliance.
- (4) If each individual coating used by an affected facility has a VOC content, as received, which when divided by the transfer efficiency (60%), results in a value equal to or less than 0.90 kilogram per liter, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.

[40 CFR 60.313(c)]

**B.6. Coating Composition Determination.** The owner or operator shall determine the composition of the coatings (as needed for the procedures in Specific Condition B.5.) by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Reference Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coating to determine the VOC content of coatings using Reference Method 24. The owner or operator shall determine the volume of coating and the mass of VOC-solvent used for thinning purposes from company records on a monthly basis.

[40 CFR 60.313(c)(1)]

**B.7. Test Methods.** Method 24, or coating manufacturer's formulation data, shall be used in the determination of VOC content of each batch of coating as applied to the surface of the metal parts. In case of an inconsistency between the Method 24 results and the formulation data, the Method 24 results will govern. For Method 24, the coating sample must be at least a 1 liter sample in a 1 liter container taken at a point where the sample will be representative of the coating material as applied to the surface of the metal part.

[40 CFR 60.316(a); and 40 CFR 60.316(b)]

### **Recordkeeping and Reporting Requirements**

**B.8. Quarterly/Semiannual Reporting.** The owner or operator of an affected facility shall identify, record, and submit a written report every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids is greater than the limit specified in Specific Condition **B.2**. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

[40 CFR 60.315(b)]

**B.9. Recordkeeping.** The facility shall maintain, at the facility, records of all data and calculations used to determine VOC emissions from the metal furniture painting operation (including a daily log of the air pressure with HVLP sprayer), a minimum of five years.

[Rule 62-213.440(1)(b), F.A.C. and 40 CFR 60.315(d) subsumed]

**B.10.** The emissions unit is also subject to conditions **C.1** through **C.4**.

**Subsection C. This section addresses the following emissions units**

<u>E.U. ID No.</u>	<u>E. PointID No.</u>	<u>Brief Description</u>
001		Tag Printing/Coating Operation
	01	Tag Clear coat Dipping Tank and Ink Application Area
	02	Tag Clear Coat Natural Gas-Fired Drying Oven
	03	Tag Ink Natural Gas-Fired Drying Oven
002		Metal Furniture
	04	Metal Furniture Spray Paint Booth #1
	05	Metal Furniture Spray Paint Booth #2
	06	Metal Furniture Natural Gas-Fired Bake Oven

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

**Emission Limitations and Standards**

{Permitting note: Table 1-2, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**C.1. Volatile Organic Compounds.** Total VOC including total HAP emissions shall not exceed 65.09 pounds per hour or 87.26 tons per year.

[Air construction permit No. 1250007-002-AC]

**C.2. Xylene.** Xylene emissions shall not exceed 30.00 tons per year.

[Air construction permit No. 1250007-002-AC]



**Test Methods and Procedures**

{Permitting note: Table 2-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**Recordkeeping and Reporting Requirements**

**C.3. Recordkeeping.** Compliance with Conditions **C.1.** and **C.2.** shall be determined by recording the following data for each material used at the facility (both plant operations) that contains VOC or Xylenes.

Quantity	
<ul style="list-style-type: none"><li>Amount of Material Used (Gallons or Pounds) (Plant usage logs shall be maintained)</li></ul>	
Emissions Factors	
<ul style="list-style-type: none"><li>Density of Material in Pounds per Gallon (Manufacturer specification's data shall be maintained)</li></ul>	<ul style="list-style-type: none"><li>VOC Factor (Percentage by Weight)</li><li>Time Factor (Hours per Month)</li></ul>
Emissions	
<ul style="list-style-type: none"><li>Hourly VOC Emissions (Pounds per Hour) (Monthly VOC emissions / Time factor)</li><li>Total Cumulative Emissions (Tons)</li></ul>	

[Title V permit No. 1250007-003-AV]

**C.4. Reporting.** A report of the data required by Specific Condition **C.4.** shall be submitted to the Northeast District Office on a semi-annual basis. These reports shall be postmarked no later than the 60th day following the end of the reporting period defined below:

**Reporting Period**

January - June  
July – December

**Report Due Date**

September 1  
March 1

The annual operating report for that calendar year shall be submitted in lieu of the July-December semi-annual report.

**C.5. Statement of Compliance.** Annually, within 60 days after the end of each calendar year during which the Title V permit was effective, the source must submit a Statement of Compliance with all terms and conditions of the permit that includes all the provisions of 40 CFR 70.6(c)(5)(iii), incorporated by reference at Rule 62-204.800, F.A.C. for Title V requirements. Such statement shall be submitted (postmarked) to the Department and EPA.  
[62-213.440(3)(a)2., F.A.C.]