

STATEMENT OF BASIS

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

Title V Air Operation Permit Revision
PROPOSED Permit No.: 1250007-006-AV

This Title V Air Operation Permit Renewal 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.

The purpose of this permit is to revise the expiration date of Title V Air Operation Permit No. **1250007-004-AV**. 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 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.

The operation of the Metal Furniture Plant is regulated under New Source Performance Standards (NSPS), 40 CFR 60, Subpart EE, Standards of Performance for Surface Coating of Metal Furniture.

CAM does not apply.

The following operations will not be allowed after the expiration of the Title V Permit.

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.

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).