Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Insteel Wire Products, Inc.
1 Wiremil Road
Sanderson, Florida 32087

Authorized Representative:
Donald L. Sapp, General Manager

Air Permit No. 0030004-008-AF
Date of Issue: April 3, 2012
Expiration Date: April 3, 2017

Air Federally Enforceable State
Operating Permit Renewal

This is the final air federally enforceable state operating permit (FESOP), which renews permit no. 0030007-008-AF for the Sanderson facility, which is a Steel Wire Facility (Standard Industrial Classification No. 3315). The facility is located at 1 Wiremil Road, Sanderson, in Baker County, Florida. The UTM coordinates are Zone 17, 378.9 km East, and 3347.3 km North.
This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution operation permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.).

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Khalid Al-Nahdy

Khalid Al-Nahdy, P.E.
District Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on April 3, 2012, to the persons listed below.

Donald L. Sapp, General Manager, Insteel Wire Products, Inc. (dsapp@insteel.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Monique Jordan

(Clerk) 4/4/2012 (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

Insteel Wire Products of Florida produces PC strand, high carbon seven-wire strand that is used to impart compression forces into precast structures and elements, providing reinforcement for prestressed and posttensioned concrete. PC strand is primarily used in concrete infrastructure applications including bridges, institutional and commercial buildings, parking decks and other slab on grade construction.

The facility operates under a FESOP in order to limit its Potential to Emit (PTE) Hydrochloric acid (HCl) at less than the major source threshold of 10 TPY for an individual Hazardous Air Pollutant (HAP). The facility has requested the maximum yearly HCl emission rate of 8.5 TPY as the cap for HCl potential emissions.

The facility also consists of the following activities that are exempted from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C. pursuant to the Generic Emissions Unit Exemption (62-210.300(3)(b)1., F.A.C.):

Wire Drawing Machine with Dust Collector. Estimated emissions for this unit are 1.78 tons per year of particulate matter.

Chemical Cleaning Station (replaced EU 001, Powder Coater Shot Blast Unit). Estimated emissions for this unit are 46.7 pounds per year of VOC.

Additionally, the Electrostatic Powder Coater Emissions Unit (EU002) is exempt from permitting pursuant to 62-210.300(3)(a)27, F.A.C. The unit is not subject to a unit-specific requirement, and the MSDS for the powder states that the weight percent of volatiles in the powder is less than 5%.

Facility Regulatory Classification

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

These emissions unit are regulated under the following:
Rule 62-210.300(2)(b), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Florida Department of Environmental Protection (Department). The mailing address is 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to this District office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Florida Department of Environmental Protection (Department). The mailing address is 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to this District office.

3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions;
   d. Appendix D. Common Testing Requirements

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Application for Non Title V Permit Renewal: This permit authorizes operation of the permitted emissions units. The permittee shall apply for a Non-Title V air operation permit renewal (DEP Form No. 62-210.900(4), F.A.C.) at least 60 days prior to expiration of this permit. To apply for a Non-Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, F.A.C.]

8. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

9. The I.D. No. and Project name for this source shall be used on all correspondence

This section of the permit addresses the following emissions units.

E.U. ID No.	Brief Description
003	Hydrogen Chloride Cleaning Unit

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. Hours of Operation: The hours of operation are not limited; i.e., 8760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

2. Maximum Operation Rate: The maximum operating rates are listed below: [Rule 62-4.070(3), F.A.C.]

Emissions Unit	Material	Rate	
		lb/hr	tons/yr
003	Hydrogen Chloride	450	1,972

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

3. Emissions Limits: The maximum allowable emission rate for each pollutant is stated below:

Pollutant	Emissions Unit	Emission Rate	Rule
Hydrogen Chloride	003	4 lb/hr[1]; 8.5 tpy[2]	Emissions cap requested by applicant to avoid Title V Source classification.

(1) Based on stack test performed July 1996 with 15% safety factor
(2) Based on 4 lb/hr * 4260 hrs/yr

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

4. Compliance Testing: Test the emissions with the frequency stated below, notify the Department 15 days prior to testing [FAC Rules 62-297.310(7)(a)3 and 62-297.310(7)(a)9], and submit the test report documentation to the Department within 45 days after completion of the testing. [FAC Rule 62-297.310(8)]

Pollutant	Emissions Unit	Test Method	Test Frequency	Rule
Hydrogen Chloride	003	EPA Method 26	Every 30 Months	FESOP Permit No. 0030004-003-AF modified July 18, 2000

REPORTING AND RECORDKEEPING REQUIREMENTS

5. Recordkeeping: Owner or operator shall record and maintain the following data.
   a. Monthly operating hours.
   b. Total estimated emissions of HCl on a 12-month rolling total basis.
   c. Copy of all calculations and supporting documents for HCl emission rate estimation.

   Note: Emissions calculation methods shall be consistent with those used in the permit application and/or modification requests.
   [Rule 62-4.070, F.A.C.]

6. Record Retention: All the measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least three (3) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request.
   [Rule 62-4.160(14)b, F.A.C.]