United States Marine Corps
Marine Corps Support Facility - Blount Island
Facility ID No.: 0310099
Duval County

Title V Air Operation Permit Revision

FINAL Permit No.: 0310099-011-AV
Revision of Title V Air Operation Permit No.: 0310099-006-AV

PERMITTING & COMPLIANCE AUTHORITY:
ENVIRONMENTAL AND COMPLIANCE DEPARTMENT
ENVIRONMENTAL QUALITY DIVISION
407 NORTH LAURA STREET, THIRD FLOOR
JACKSONVILLE, FL 32202
TELEPHONE: (904) 255-7100
FAX: (904) 588-0518

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Table of Contents

Section **Page Number**

Placard Page ……..1

I. Facility Information …… 2 - 3
   A. Facility and Project Description.
   B. Summary of Emissions Unit ID No(s). and Brief Description(s).

II. Facility-wide Conditions ……...3 - 6

III. Emissions Unit(s) and Conditions …….....6 - 9

Emissions Unit - 001	Abrasive Blast Booth
Emissions Unit - 005	Abrasive Blast Booth
Emissions Unit - 007	Spray Coating Booths

Statement of Basis
Operation and Maintenance Plans
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix LR-1, Local Rule Index
Appendix TV-6, Title V Conditions
Appendix SS-1, Stack Sampling Facilities
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements

Permittee:
United States Marine Corps
Marine Corps Support Facility – Blount Island
5880 Channel View Blvd.
Jacksonville, FL 32226

FINAL Permit No.: 0310099-011-AV
Facility ID No.: 0310099
SIC Nos.: 97
Project: Title V Air Operation Permit Revision

This permit is for the purpose of revising Title V Operation Permit No. 0310099-006-AV by incorporating the applicable terms and conditions identified in Construction Permit No. 0310099-010-AC issued on February 4, 2010**.** This facility is located at 5880 Channel View Blvd., Jacksonville, Duval County, FL 32226-3404; UTM Coordinates: Zone 17, 449.76 km East and 3363.60 km North; Latitude: 30° 24' 18" North and Longitude: 81° 31' 23" West.

This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, Florida Administrative Code (FAC). 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:

Statement of Basis
Operation and Maintenance Plans
Appendix I-1, List of Insignificant Emission Units and/or Activities
APPENDIX TV-6, TITLE V CONDITIONS
APPENDIX SS-1, STACK SAMPLING FACILITIES

Initial Effective Date:	**November 20, 2007**
Revision Effective Date:	**October 16, 2011**
Renewal Application Due Date:	**November 17, 2011**
Expiration Date:	**June 30, 2012**

Environmental and Compliance Department
Environmental Quality Division

_____
Vincent A. Seibold, P.E.
Chief

VAS/GHB

Section I. Facility Information

Subsection A. Facility and Project Description.

This Title V facility is a freight shipping container, military combat equipment, and aircraft ground support equipment maintenance facility. The facility operations include abrasive blasting and surface coating operations.

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

This permit is for the purpose of revising Title V Air Operation Permit No. 0310099-006-AV by incorporating the applicable terms and conditions identified in Air Construction Permit No. 0310099-010-AC, which replaced the dust collector for Emission Unit No. 005 (abrasive blast booth).

The facility is a Title V major source of air pollution because the potential emissions of any one regulated air pollutant is 100 tons per year or more and/or the potential emissions of any one Hazardous Air Pollutant (HAP) is 10 tons per year or more or 25 tons per year or more for any combination of HAPs, pursuant to Chapter 62-210, FAC, and Rule 2.301, Jacksonville Environmental Protection Board (JEPB).

According to the Title V air operation permit revision application received on September 9, 2010, the facility is a major source of HAPs.

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

EU No.	EU Description	Control Device
001	Abrasive Blast Booth	Wheelabrator, Model 36 WCC High Energy Pulse Cleaned Cartridge Dust Collector Wheelabrator-Frye, Model 704C Dust Collector (ducted into the Mechanical Room)
005	Abrasive Blast Booth	Donaldson Torit Downflo Oval (DFO) Cartridge Dust Collector 3-18
007	Spray Coating Booths	Spray Coating Booth No. 1: Dry filter system ducted to three (3) vents. Spray Coating Booth No. 3: Dry filter system. Spray Coating Booths Nos. 2 and 4 are uncontrolled.

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:
Title V Air Operation Permit No. 0310099-006-AV
Title V Air Operation Permit No. 0310099-009-AV
Air Construction Permit No. 0310099-010-AC
Tile V Air Operation Permit Revision Application received September 9, 2010
Additional information requested October 8, 2010
Additional information responses received December 17, 2010 and April 6, 2011

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix TV-6, Title V Conditions, is a part of this permit.
   Permitting note: Appendix TV-6, 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). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, FAC, and Rule 2.1201, JEPB.
   [Rule 62-296.320(4)(b)1., FAC, and Rule 2.1101, JEPB]

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 Permitting Authority.
   [Rule 62-296.320(1), FAC, and Rule 2.1101, JEPB]

5. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter emissions from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following:
   a. Paving and maintenance of roads, parking areas and yards.
   b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
   c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
   d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
   e. Landscaping or planting of vegetation.

f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
g. Confining abrasive blasting where possible.
h. Enclosure or covering of conveyor systems.

[Rule 62-296.320(4)(c)1 & 3, FAC, and Rule 2.1101, JEPB]

6. 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 2.1401, JEPB]

7. Permittee shall notify the Permitting Authority fifteen (15) days prior to the date of each formal compliance test conducted for an emissions unit.
[Rule 62-297.310(7)(a)9., FAC, and Rule 2.1201, JEPB]

8. Stack sampling facilities and control equipment shall be provided with a method of access that is safe and readily accessible.
[Rule 62-297.310(6), FAC, and Rule 2.1201, JEPB]

9. Testing of emissions shall be conducted with the Emissions Unit operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then Emissions Units may be tested at less capacity; in this case subsequent Emissions Unit operation is limited to 110 percent of the test load until a new test is conducted. Once the Emissions Unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
[Rule 62-297.310(2), FAC, and Rule 2.1201, JEPB]

10. Copies of the test report(s) shall be filed with the Permitting Authority within forty-five (45) days of completion of testing.
[Rule 62-297.310(8)(b), FAC, and Rule 2.1201, JEPB]

11. 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]

12. The permittee shall submit all compliance related notifications and reports required of this permit to:

Environmental and Compliance Department
Environmental Quality Division
Ed Ball Building, 214 N. Hogan Street, 7th Floor
Jacksonville, FL 32202
Telephone: (904) 255-7100
Fax: (904) 588-0518

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

14. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., FAC, shall be submitted to the Permitting Authority 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-6, Title V Conditions)}
[Rules 62-213.440(3) and 62-213.900, FAC, and Rule 2.501, JEPB]

15. 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]

16. 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 Permitting Authority 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 2.1401, 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(1), (4), and (6), FAC, and Rule 2.201, JEPB]

17. 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 2.1401, 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]

18. Annual operation Report. Permittee shall submit an annual operating report to the Permitting Authority for this (these) emission unit(s) on the form(s) supplied for each calendar year by April 1 of the following year.
[Rule 62-210.370(3), FAC, and Rule 2.301, JEPB]

19. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-Line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm.
[Rule 62-213.205, FAC and Rule 2.501, JEPB]

20. Notification of Startup. The owners or operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the Permitting Authority in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.

a. The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.
b. If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Permitting Authority as soon as possible after the date of such startup is ascertained.
[Rule 62-210.300(5), F.A.C. and Rule 2.301, JEPB]

21. Permit Renewal. For purposes of a permit renewal, a timely application is one that is submitted 225 days before the expiration of a permit that expires on or after June 1, 2009.
[Rule 62-213.420(1)(a)2., F.A.C. and Rule 2.501, JEPB]

The following Facility-wide conditions are not federally enforceable:

22. 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 2.1101, JEPB]

23. 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].

24. The facility shall be subject to JEPB Rule 2, Parts I through VII, and Parts IX through XIV.

Section III. Emissions Unit(s) and Conditions.

Emissions Unit No. 001 - Abrasive Blast Booth

Emissions Unit Description:	Removal of paint from refrigerated/non-refrigerated freight containers and principal end items such as chassis loading systems, front-end loaders, etc. The abrasive blast media utilized is aluminum oxide and steel shot. Aluminum oxide blast media is used on aluminum substrate and steel shot is used on steel substrate. Compliance Assurance Monitoring (CAM) does not apply.
Control Device(s):	Wheelabrator, Model 36 WCC High Energy Pulse Cleaned Cartridge Dust Collector Wheelabrator-Frye, Model 704C Dust Collector (ducted into the Mechanical Room)

Essential Potential to Emit (PTE) Parameters

1. The nominal volumetric flow rate from this emissions unit is 88,500 cubic feet per minute (cfm).
[Rule 62-296.700(4), FAC, and Rule 2.1101, JEPB]

Emission Limitations and Standards

2. Reasonably Available Control Technology (RACT) requirements including **Specific RACT Emission Limiting Standards for Stationary Emission Units** [Rule 62-296.700(3), FAC, and Rule 2.1101, JEPB]**; Maximum Allowable Emission Rates** [Rule 62-296.700(4), FAC, and Rule 2.1101, JEPB]; **Circumvention** [Rule 62-296.700(5),FAC, and Rule 2.1101, JEPB], and **Operation and Maintenance Plan** [Rule 62-296.700(6), FAC, and Rule 2.1101, JEPB] shall apply to this emission unit.

3. The hours of operation for this emissions unit shall not exceed 4,160 hours per year (hrs/yr).
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

4. The maximum hourly abrasive blast media usage shall not exceed 18.0 tons/hour.
[Rule 62-296.700(4), FAC, and Rule 2.1101, JEPB]

5. Particulate Matter (PM) emissions shall not exceed 0.03 grains per dry standard cubic feet [22.76 pounds per hour (lbs/hr) and 47.34 tons per year (tons/yr)].
[Rule 62-296.712(2), FAC, and Rule 2.1101, JEPB]

6. Visible emissions (VE) shall not exceed 5 percent opacity.
[Rule 62-296.712(2), FAC, and Rule 2.1101, JEPB]

Test Methods and Procedures

7. Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA Reference Method (RM) 5 (as described in 40 CFR 60, Appendix A) for particulate matter.
[Rule 62-296.712(3), FAC, and Rule 2.1101, JEPB]

8. Testing for demonstration of compliance shall be performed in accordance with EPA RM 9 (as described in 40 CFR 60, Appendix A) for the visual determination of opacity.
[Rule 62-296.712(3), FAC, and Rule 2.1101, JEPB]

9. VE shall be tested annually from the date of December 1, 2006.
[Rule 62-213.440(1)(b)1.b., FAC, Rule 62-297.310(7)(a)4.a., FAC, Rule 2.501, JEPB, and Rule 2.1201, JEPB]

Reporting and Recordkeeping Procedures

10. An Operation and Maintenance Plan shall be attached to and shall be part of this permit. All activities shall be performed as scheduled and recorded. Data shall be made available to the Permitting Authority upon request. Records shall be maintained on file for a minimum period of two (2) years.
[Rule 62-296.700(6)(e), FAC, and Rule 2.1101, JEPB]

Emissions Unit No. 005 - Abrasive Blast Booth

Emissions Unit Description - Removal of paint from miscellaneous aircraft ground support equipment parts. The abrasive blast media utilized is aluminum oxide and steel shot.

Control Device(s): Donaldson Torit Downflo Oval (DFO) Cartridge Dust Collector 3-18

Essential Potential to Emit (PTE) Parameters

1. The nominal volumetric flow rate from this emissions unit is 10, 387 cubic feet per minute.
[Rule 62-296.700(4), FAC, and Rule 2.1101, JEPB]

Emission Limitations and Standards

2. Reasonably Available Control Technology (RACT) requirements including **Specific RACT Emission Limiting Standards for Stationary Emission Units** [Rule 62-296.700(3), FAC, and Rule 2.1101, JEPB]**; Maximum Allowable Emission Rates** [Rule 62-296.700(4), FAC, and Rule 2.1101, JEPB]; **Circumvention** [Rule 62-296.700(5), FAC, and Rule 2.1101, JEPB], and **Operation and**

Maintenance Plan [Rule 62-296.700(6), FAC, and Rule 2.1101, JEPB] shall apply to this emission unit.

3. The maximum process rate of abrasive consumed shall not exceed 0.077 tons per hour and 80.0 tons per year.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

4. The hours of operation for this emissions unit shall not exceed 1,040 hours per year.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

5. Particulate Matter emissions shall not exceed 0.03 grains per dry standard cubic feet [2.67 pounds per hour and 1.39 tons per year].
[Rule 62-296.712(2), FAC, and 2.1101, JEPB]

6. Visible emissions (VE) shall not exceed 5 percent opacity.
[Rule 62-296.712(2), FAC, and 2.1101, JEPB]

Test Methods and Procedures

7. Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA Reference Method (RM) 5 (as described in 40 CFR 60, Appendix A) for particulate matter. The minimum sample volume shall be 30 dry standard cubic feet.
[Rule 62-296.712(3), FAC, and 2.1101, JEPB]

8. Testing for demonstration of compliance shall be performed in accordance with EPA RM 9 (as described in 40 CFR 60, Appendix A) for the visual determination of opacity. VE testing shall be conducted for a minimum period of 30 minutes.
[Rule 62-296.712(3), FAC, Rule 62-297.310(4)(a)2., FAC, Rule 2.1101, JEPB and 2.1201, JEPB]

9. VE shall be tested annually from the date of December 1, 2006.
[Rule 62-213.440(1)(b)1.b., FAC, Rule 62-297.310(7)(a)4.a., FAC Rule 2.501, JEPB, and Rule 2.1201, JEPB]

Reporting and Recordkeeping Procedures

10. An Operation and Maintenance Plan shall be attached to and shall be part of this permit. All activities shall be performed as scheduled and recorded. Data shall be made available to the Permitting Authority upon request. Records shall be maintained on file for a minimum period of two (2) years.
[Rule 62-296.700(6)(e), FAC, and Rule 2.1101, JEPB]

Emissions Unit No. 007 – Spray Coating Booths

Emissions Unit Description:	Four (4) spray coating booths for the application of coatings to freight containers (topcoat and primer) and principal end items such as 5-ton trucks, tanks, chassis loading systems, aircraft ground support equipment, and miscellaneous related parts. In addition, the 4 booths can be used to spray foam to produce enclosures for aircraft ground support equipment.
Control Device:	Spray Coating Booth No. 1 has a dry filter system ducted to three (3) vents. Spray Coating Booth No. 3 has a dry filter system. Spray Coating Booths Nos. 2 and 4 are uncontrolled.

Essential Potential to Emit (PTE) Parameters

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

Emission Limitations and Standards

2. The maximum allowable VOC emissions shall not exceed 196.0 tons/yr.
   [Air Construction Permit No. 0310099-007-AC]

Test Methods and Procedures

3. Testing for demonstration of compliance shall be performed in accordance with EPA RM 24 (as described in 40 CFR 60, Appendix A) for VOC. Manufacturer's data sheets with VOC contents may be substituted with the approval of the Permitting Authority.
   [Rule 62-296.513(4), FAC and Rule 2.1101, JEPB]

Recordkeeping and Reporting Requirements

4. Records shall be maintained on a monthly basis for the following:

   a. Coatings usage
   b. VOC and Hazardous Air Pollutant (HAP) content (lbs/gal) of coatings as applied
   c. Solvent / thinner usage
   d. VOC and HAP content of solvent / thinner
   e. VOC and HAP emissions

   Records shall be maintained for a minimum of five (5) years and made available to the Permitting Authority upon request.
   [Rule 62-213.440(1)(b), FAC, and Rule 2.501, JEPB]

5. Quarterly reports shall be submitted to the Permitting Authority 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]