

STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. 0230046-009-AV

APPLICANT

The applicant for this project is New Millennium Building Systems. The applicant's responsible official and mailing address are Mr. Jeff Coker, General Manager, New Millennium Building Systems, LLC., Lake City Facility, 1992 Northwest Bascom Norris Drive, Lake City, Florida 32055.

FACILITY DESCRIPTION

The applicant operates the existing Lake City Facility, which is located in Columbia County at 1992 Northwest Bascom Norris Drive in Lake City, Florida. This existing facility manufactures steel joists and metal decks. The facility consists of the following emission units and/or activities: steel decking manufacturing, steel joist manufacturing, two unregulated portable plasma cutters, a gasoline dispensing operations, and a 32 horsepower (HP) emergency engine. This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

| EU No. | Brief Description |
|--------|---|
| 001 | Metal Coil Surface Coating Process |
| 002 | Dip Tank Coating Process |
| 004 | Gasoline Dispensing Operations |
| 005 | Emergency Natural Gas Engine (32 Horsepower (HP)) |

APPLICABLE REGULATIONS

Based on the Title V air operation permit renewal application received on August 8, 2024, this facility is not a major source of hazardous air pollutants (HAP). The existing facility is not a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table:

| Regulation | EU Nos. |
|--|-------------------------|
| <i>Federal Rule Citations</i> | |
| 40 CFR 60, Subpart A, NSPS General Provisions | 001, 005 |
| 40 CFR 60, Subpart TT – Standards of Performance for Metal Coil Surface Coating. | 001 |
| 40 CFR 60, Subpart NSPS, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engine (ICE) | 005 |
| 40 CFR 63, Subpart A – General Provisions | 002, 004, 005 |
| 40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE). | 005 |
| 40 CFR 63, Subpart CCCCCC –NESHAP for Source Category: Gasoline Dispensing Facilities. <i>{Not adopted by the state.}</i> | 004 |
| 40 CFR 63, Subpart XXXXXX NESHAP Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. <i>{Not adopted by the state.}</i> | 002 |
| <i>State Rule Citations</i> | |
| Chapter 62-213. F.A.C., Operation Permits for Major Source of Air Pollution | 001, 002, 003, 004, 005 |
| Rule 62-204.800, F.A.C., Federal Regulations Adopted by Reference | 001, 002, 004, 005 |

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PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V air operation permit for the above referenced facility which reflects the standards and requirements to be established in the concurrently issued air construction Permit No. 0240046-010-AC. Further details are included in the Technical Evaluation and Preliminary Determination accompanying the draft air construction permit.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received **August 8, 2024**

Additional Information Request dated **September 13, 2024**

Additional Information Response received **December 3, 2024**

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 3441 – Fabricated Structural Metal.

North American Industry Classification System (NAICS): 332312 – Fabricated Structural Metal Manufacturing.

HAP: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

PROJECT REVIEW

The purpose of this project is to renew permit 0230046-007-AV and to incorporate concurrent air construction Permit No. 0230046-010-AC for the above referenced facility. In addition, minor revisions to rule language to correct or clarify the intent of the rule.

The revised permit includes the following changes.

1. Changes throughout the Title V air operation permit are based on the Department's updated formats for a Title V air operation permit.

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2. Added a new Subsection D, Emission Unit 005, Emergency Natural Gas Engine (32 HP); and the applicable federal regulation, 40 CFR Part 63 Subpart ZZZZ, under the appendices.

Section II. Facility-Wide Conditions

3. Air construction Permit No. 0230046-010-AC established and reduced the VOC emissions limit from 249 tons/year in previous Specific Condition **FW9** (Facility-Wide Allowable Air Emissions) to 225 tons/year.

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Section III. Emission Units and Specific Conditions

Subsection A. Metal Coil Surface Coating Process (EU 001)

4. Updated the applicable requirements pursuant to 40 CFR 60, Subpart TT, Standard of Performance for Metal Coil Surface Coating.
5. Air construction Permit No. 0230046-010-AC removed previous Specific Conditions **A.1** (Permitted Capacity) since the facility-wide VOC emissions cap was decreased from 249 tons/year to 225 tons/year.
6. Previous Specific Conditions **A.5** (Monitoring of Emissions) and **A.8** (Compliance Determination Method) was combined for clarity and consistency.
7. Air construction Permit No. 0230046-010-AC removed previous Specific Conditions **A.11** (Recordkeeping) and created a new recordkeeping requirement addressing the facility-wide VOC cap.
8. Air construction Permit No. 0230046-010-AC removed previous Specific Condition **A.12** (Emission Factors and Emissions Calculations) since the facility has the option to use different emission factors or methodologies in accordance with Rule 62-210.370, F.A.C., Emissions Computation and Reporting.

Subsection B. Dip Tank Coating Process (EU 002)

9. Updated the applicable requirements pursuant to 40 CFR 63, Subpart XXXXXX, NESHAP Area Source Standards for Nine Metal Fabrication and Finishing Source Categories as an existing source constructed before April 3, 2008, of 40 CFR 63, not adopted by the state of Florida.
10. Air construction Permit No. 0230046-010-AC removed previous Specific Conditions **B.1** (Permitted Capacity) since the facility-wide VOC emissions cap was decreased from 249 tons/year to 225 tons/year.
11. Air construction Permit No. 0230046-010-AC removed previous Specific Condition **B.4** (VOC Recordkeeping Requirements) and created a new recordkeeping requirement addressing the facility-wide VOC cap.
12. Air construction Permit No. 0230046-010-AC removed previous Specific Condition **B.5** (Emissions Factors and Calculations) since the facility has the option to use different emission factors or methodologies in accordance with Rule 62-210.370, F.A.C., Emissions Computation and Reporting.
13. Previous Specific Conditions **B.12** (General Requirements), **B.13** (Visual Determination of Fugitive Emissions Requirements), and **B.14** (Visual Determination of Emissions Opacity Requirements) were combined for clarity and consistency.

Subsection C. Gasoline Dispensing Operations (EU 004)

14. Updated the applicable requirements pursuant to 40 CFR 63, and Subpart CCCCCC, NESHAP for Source Category: Gasoline Dispensing Facilities as an existing source constructed before January 10, 2008, not adopted by the state of Florida.

Subsection D. Emergency Natural Gas Engine (32 HP) (EU 005)

15. Added a new Subsection D to add the new natural gas emergency engine and the applicable 40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary SI ICE.

CONCLUSION

This project renews Title V air operation Permit No. 0230046-007-AV, which was effective on March 24, 2020. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.