



Environmental Protection and Growth Management Department  
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION  
One North University Drive, Suite 203, Plantation, Florida 33324  
954-519-1260 • FAX 954-519-1495

## NOTICE OF FINAL PERMIT

Ms. Thamer Azule – Wright, Human Resources Director  
Zumro Manufacturing, Inc.  
650 S.W. 16<sup>th</sup> Terrace  
Pompano Beach, Fl 33069

**VIA ELECTRONIC MAIL  
E-MAIL RECEIPT REQUESTED**

Dear Ms. Azule:

Enclosed is construction permit number 0112706-003-AC to construct an air pollution source issued pursuant to Section 403.087 of the Florida Statutes, Broward County's Specific Operating Agreement with the Florida Department of Environmental Protection, and Broward County Code Chapter 27 Article IV which adopts Florida Administrative Code (FAC) 62-4, 62-296 and 62-297.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 62-103 and 28-5.201, FAC, and must be filed (received) in the in the Office of the Broward County Attorney at 115 South Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872 within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes and Chapter 27. This permit is final and effective on the date filed with the Clerk of the PPRAQD unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, FAC. Upon timely filing of a petition or a request for an extension of time, this permit will not be effective until further Order of the PPRAQD. When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, in the Office of the Broward County Attorney at 115 South Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872 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 of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Broward County, Florida  
POLLUTION PREVENTION, REMEDIATION AND  
AIR QUALITY DIVISION

A handwritten signature in black ink that reads "Daniela Banu".

Daniela Banu, Air Quality Administrator

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Permit was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with e-mail return receipt requested before the close of business on 1/12/2013 to the persons listed below

Thamer Azule-Wright, Zumro Manufacturing, Inc. via e-mail ([thamer@zumro.com](mailto:thamer@zumro.com))

Albert Webber, P.E. via e-mail ([vpickett@epacinc.com](mailto:vpickett@epacinc.com))

Veronica Pickett, EPAC Environmental Services, Inc. via e-mail ([vpickett@epacinc.com](mailto:vpickett@epacinc.com))

Lee Hoefert, SFDEP, Air Section via e-mail ([Lee.Hoefert@dep.state.fl.us](mailto:Lee.Hoefert@dep.state.fl.us))

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.



\_\_\_\_\_  
(Clerk)



\_\_\_\_\_  
(Date)



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POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION  
One North University Drive, Suite 203, Plantation, Florida 33324  
954-519-1260 • FAX 954-519-1495

**NOTICE OF AIR POLLUTION PERMIT**

**ISSUED TO:**

**PERMITTEE:**  
Mr. Thamer Azule  
Human Resources Director  
Zumro Manufacturing, Inc.  
650 S.W. 16h Terrace  
Pompano Beach, Florida 33069

**AIRS ID NO:** 0112706  
**Permit Number:** 0112706-003-AC  
**Issue Date:** January 13, 2013  
**Expiration Date:** January 13, 2014  
**County:** Broward

**Facility Name:** Zumro Manufacturing, Inc.

**Project Description:** Construction permit for a temporary inflatable shelters and rescue pods manufacturing operation to remove emissions limiting standards previously included in the Federally Enforceable State Operation Permit (FESOP), 0112706-001-AF; and to add a more detailed recordkeeping requirements.

SIC Code: 2399

**Location:** 3050 S.W 42<sup>nd</sup> Street, Fort Lauderdale, Florida 33312.

**Lat/Long:** 26° 13'19.5"N/80° 8'37.2W

**UTM:** Zone 17; 585.54 Km. E; 2900.56 Km. N

**Statement of Basis:** This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) Florida Administrative Code (F.A.C.) Rules 62-4 and 62-210 through 62-297 (permitting requirements) and Broward County Code, Chapter 27 (emission limitations) and in conformance with all existing regulations of the Florida Department of Environmental Protection (FDEP). The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Broward County Pollution Prevention, Remediation and Air Quality Division (PPRAQD) and made a part hereof.

**In accordance with:** Application to obtain Federally Enforceable State Operation Permit received on June 13, 2008, additional information received July 25, 2008 and August 28, 2008, Notice of Intent to Issue Permit issued on October 7, 2008 and Public Notice of Intent published on October 17, 2008 in the Broward Daily Business Review Newspaper, construction permit application received August 20, 2012 (None are attached).

**This permit is organized by the following sections.**

- 1. Facility Description
- 2. General Conditions
- 3. Facility-wide Conditions
- 4. Emissions Unit Specific Conditions

**Executed in Broward County, Florida**

Daniela Banu  
Air Quality Administrator  
Broward County Pollution Prevention, Remediation and Air Quality Division

**1. FACILITY DESCRIPTION**

Zumro Manufacturing, Inc. is a manufacturer of temporary inflatable shelters and rescue pods. As part of the manufacturing process, adhesives containing Hazardous Air Pollutants identified as toluene, hexane and methanol are applied to the product material which is a fabric reinforced neoprene rubber. This operation is not equipped with air pollution control equipment, as only fugitive emissions occur during the application of adhesives. The manufacturing operation consists of the following principal steps: 1) adhesive containers are removed from the hazardous materials storage area, as needed, opened; 2) adhesive is applied to the portions of the neoprene fabric to be joined together; 3) toluene is wiped on the adhesive to activate the adhesive; 3) the pieces are joined together and pressure is applied to assure a seal; and 4) the containers are closed tightly and returned to the hazardous materials storage area upon completion of the adhesives application. There is no surface coating application associated with the process. The facility also utilizes a solvent distillation system to recover unused toluene from the manufacturing process and to reduce its generation of hazardous waste.

Zumro Manufacturing, Inc. has an Operations and Maintenance Plan which it is part of the permit application.

The facility exceeded the single HAP (toluene) emissions limit of 10 tons/year set in the FESOP, 0112706-001-AF; and it is subject to Title V (major source) requirements. It is obtaining a Title V operation permit.

The facility consists of the following emissions unit:

E.U. ID No.	Brief Description
001	One process/production unit consisting of adhesives application area. The material (fabric) is cut and then glued together to create the inflatable product. The adhesives are applied manually. The volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions resulting from this operation are fugitive in nature.

**2. GENERAL CONDITIONS**

1. **Terms of Permit.** The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The Permittee is placed on notice that the PPRAQD will review this permit periodically and may initiate enforcement action for any violation of these conditions.  
[Rule 62-4.160 (1), F.A.C.]
2. **Permit Validity.** This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the PPRAQD.  
[Rule 62-4.160 (2), F.A.C.]
3. **Disclaimer.** As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, or any violations of federal, state or local laws or

regulations. This permit is not a waiver of or approval of any other permit that may be required for other aspects of the total project which are not addressed in this permit.

[Rule 62-4.160 (3), F.A.C.]

4. **Disclaimer.** This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interest have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.  
[Rule 62-4.160 (4), F.A.C.]
5. **Liability.** This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and FDEP rule, unless specifically authorized by an order from the PPRAQD.  
[Rule 62-4.160 (5), F.A.C.]
6. **Operation and Maintenance.** The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by county and state rules. This provision included the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by PPRAQD and FDEP rules.  
[Rule 62-4.160 (6), F.A.C.]
7. **Onsite Inspection Activities.** The Permittee, by accepting this permit, specifically agrees to allow authorized PPRAQD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times (depending on the nature of the concern being investigated), access to the premises where the permitted activity is located or conducted to:
  - (a) Have access to and copy any records that must be kept under conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or PPRAQD and FDEP rules.[Rule 62-4.160 (7), F.A.C.]
8. **Notice of Noncompliance.** If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide PPRAQD with the following information:
  - (a) A description of and cause of noncompliance; and
  - (b) The period of noncompliance, including dates and times, or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any enforcement action by PPRAQD for penalties or for revocation of this permit.[Rule 62-4.160 (8), F.A.C.]
9. **Reporting Noncompliance.** The Permittee shall report any periods of noncompliance to the PPRAQD immediately by phone at 954-519-1499 or by Email at EPDHOTLINE@broward.org. This also applies when the period of non-compliance is first determined after normal business hours or on weekends and holidays.  
[Rules 62-4.130 and 62-4.070(3), F.A.C.]
10. **Evidence Materials.** By accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted facility or activity, that are submitted to the PPRAQD, may be used by the PPRAQD as evidence in any enforcement

proceeding arising under the Florida Statutes or F.A.C. rules, except where such use is prohibited by Section 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.  
[Rule 62-4.160 (9), F.A.C.]

11. Rule Changes. The Permittee agrees to comply with changes in Florida Department of Environmental Protection rules and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or FDEP rules.  
[Rule 62-4.160 (10), F.A.C.]
12. Permit Transfer. This permit is transferable only upon PPRAQD approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer approved by the PPRAQD.  
[Rule 62-4.160 (11), F.A.C.]
13. Work Site Copy. This permit or a copy thereof shall be kept at the work site of the permitted activity.  
[Rule 62-4.160 (12), F.A.C.]
14. Miscellaneous Compliance Requirements. The Permittee shall comply with the following:
  - (a) Upon request, the Permittee shall furnish all records and plans required under FDEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the PPRAQD.
  - (b) The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recording for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by PPRAQD rule.
  - (c) Records of monitoring information shall include:
    1. The date, exact place, and time of sampling or measurements;
    2. The person responsible for performing the sampling or measurements;
    3. The dates analyses were performed.
    4. The person responsible for performing the analyses;
    5. The analytical techniques or methods used;
    6. The results of such analyses.  
[Rule 62-4.160 (14), F.A.C.]
15. Information Submittal. When requested by the PPRAQD, the Permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the PPRAQD, such facts or information shall be corrected promptly.  
[Rule 62-4.160 (15), F.A.C.]
16. Rules Adoption. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, as amended, are adopted by Broward County Code, Sec. 27-173.  
[Broward County Code, Sec. 27-173]

### 3. FACILITY-WIDE CONDITIONS

17. **Objectionable Odor.** 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.]
18. **General Pollutant Emission Limiting Standards.** 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.
- Tightly cover or close all VOC containers when they are not in use;
  - Tightly cover all open tanks, which contain VOCs when they are not in use;
  - Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition;
  - Confine rags used with VOCs to tightly closed, fireproof containers when not in use;
- and,
- Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.
- [Rule 62-296.320(1) (a), F.A.C., Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(f)]
19. **Emissions of Unconfined Particulate Matter.** Pursuant to Rules 62-296.320(4) (c) 1. 3. & 4. F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements:
- Paving and maintenance of roads, parking areas and yards.
  - Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
  - Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
  - 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.
  - Landscaping or planting of vegetation.
  - Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
  - Confining abrasive blasting where possible.
  - Enclosure or covering of conveyor systems.
- [Rule 62-296.320(4) (c), F.A.C.,]
20. **Concealment.** No person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which would otherwise constitute a violation of any provisions of Broward County Codes.  
[Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(b)]
21. **Circumvention.** No person shall circumvent any air pollution device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.  
[Rule 62-210.650 F.A.C and Broward County Code, Sec. 27-175(c)]
22. **Maintenance.** No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Codes.

25. Annual Operation Report (AOR). The AOR shall be submitted to the PPRAQD by April 1 of the following year. If the permittee elects to use FDEP’s electronic annual operation report software (EAOR), the report must be submitted directly to FDEP and there is no requirement to submit a copy to PPRAQD.

[Rule 62-210.370(3), F.A.C.]

{Permitting Note. Information on the EAOR submittal is available at <http://www.dep.state.fl.us/air/emission/eaor/default.htm>}

**4. EMISSIONS UNIT SPECIFIC CONDITIONS**

**Subsection A.** This section addresses the following emissions unit.

E.U. ID No.	Description of Emissions Unit
001	One process/production unit consisting of adhesives application area. The material (fabric) is cut and then glued together to create the inflatable product. The adhesives are applied manually. The volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions resulting from this operation are fugitive in nature.

**Recordkeeping and Notification Requirements**

26. VOC Content and Emissions: The permittee shall determine the VOC content of all materials, including solvents, and shall monitor the usage of such materials at the referenced emissions unit(s), by recording and maintaining the following information:

- a. The VOC content for each material containing or emitting VOCs.
- b. The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emissions unit(s).
- c. The total monthly VOC emissions rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month.
- d. A rolling consecutive 12-month total emissions rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.

[Rule 62-4.070(3) F.A.C.,]

27. HAP Content and Emissions: The permittee shall determine the total and individual HAP contents of all materials, including solvents, and shall monitor the usage of such materials at the referenced emissions unit(s), by recording and maintaining the following information:

- a. The individual and total HAP contents for each material containing or emitting HAPs.
- b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emissions unit(s).
- c. The individual and total monthly HAP emissions rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.
- d. A rolling consecutive 12-month total emissions rate for individual and total HAPs calculated from the monthly totals for the previous twelve calendar months.

[Rule 62-4.070(3) F.A.C.,]

- 28. A log shall be kept to document the amount of chemicals manifested to recyclers, the manufacturer, or the dump.  
[Rule 62-4.070(3) F.A.C.,]
- 29. The permittee shall notify PPRAQD of any change in products and submit new material safety data sheets (MSDS) for approval prior to use.  
[Rule 62-4.070(3), F.A.C.]
- 30. Semiannual Monitoring Reports: The permittee shall submit to the PPRAQD, Air Quality Program, a report of all required monitoring every 6 months. All instances of deviations from permit requirements must be clearly identified in such reports. The responsible official shall certify each report to be true, accurate, and complete based on the information submitted and belief formed after the reasonable inquiry. The reports shall be completed and submitted to the PPRAQD on or before the deadline specified in Table A.1.  
below:

**Table A.1. Dates for Semiannual Monitoring Reports**

Reporting Period	Report Deadline
July through December	January 31 <sup>st</sup>
January through June	January through June July 31 <sup>st</sup>

[Rule 62-213.440(1) (b) 3 F.A.C.]

- 31. Supporting Documentation: Supporting documentation, such as Material Safety Data Sheets (MSDS), purchase orders, etc., shall be kept, which includes sufficient information, to determine compliance. The log and documents shall be kept for at least 5 years and made available to the PPRAQD. Monthly logs shall be completed within 10 calendar days after completion of the preceding month.  
[Rule 62-4.070(3) and 62-213.440(1) (b) 2b F.A.C., Permit No. 0112706-003-AC]

**Other Requirements**

- 32. The permittee shall maintain the records required by this permit for a period of five (5) years from the date the records were created and be made available for PPRAQD staff review, if necessary.  
[Rule 62-4.070(3), F.A.C.]