



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

October 12, 2012

Ms. Thamer Azule-Wright
Human Resources Director
Zumro Manufacturing, Inc.
650 S.W. 16th Terrace
Pompano Beach, Florida 33069

Re: DRAFT Air Construction Permit No.: **0112706-003-AC**
DRAFT Title V Air Operation Permit Project No.: **0112706-004-AV**

Dear Ms. Azule- Wright:

The combined Public Notice, the DRAFT Air Construction Permit, and the DRAFT Title V Air Operation Permit for the Zumro Manufacturing, Inc. located at 650 S.W. 16th Terrace, Pompano Beach, Broward County are enclosed. The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" are also included.

An electronic version of the DRAFT Title V Air Operation Permit will be posted on the Division of Air Resource Management's World Wide Web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"<http://www.dep.state.fl.us/air/eproducts/ards/default.asp>"

The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Daniela Banu, at the above letterhead address. If you have any other questions, please contact Ms. Olga M. Ibarra, P.E. at 954/519-1260.

Sincerely,

A handwritten signature in cursive script that reads "Daniela Banu".

Daniela Banu
Air Quality Program Administrator

DB/omi
Enclosure

In the Matter of an
Application for Permits by:

Ms. Thamer Azule-Wright
Zumro Manufacturing, Inc.
650 S.W. 16th Terrace
Pompano Beach, Florida 33069

DRAFT Air Construction Permit No.: **0112706-003-AC**
DRAFT Title V Air Operation Permit No.: **0112706-004-AV**
Zumro Manufacturing, Inc.
Broward County

INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT

The Pollution Prevention, Remediation and Air Quality Division (PPRAQD) (permitting authority) gives notice of its intent to issue an Air Construction Permit and the initial Title V Air Operation Permit (copies of the Draft Air Construction Permit and DRAFT Title V Air Operation Permit are attached) for the Title V source detailed in the application(s) specified above, for the reasons stated below. The applicant, Ms. Thamer Azule-Wright, Human Resources Director Zumro Manufacturing, Inc. applied on July 30, 2012, to the permitting authority for an Air Construction Permit and a Title V Air Operation Permit for Zumro Manufacturing, Inc. located at 650 S.W. 16th Terrace, Pompano Beach, and Broward County. 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) No. 0112706-001-AF; and to add more detailed recordkeeping requirements. Initial TV Permit because the facility exceeded the single HAP (toluene) emissions limit of 10 tons/year set in the FESOP, 0112706-001-AF.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212 and 62-213. This source is not exempt from construction and Title V permitting procedures. The permitting authority has determined that an Air Construction Permit and a Title V Air Operation Permit are required to construct and to commence or continue operations at the described facility. The permitting authority intends to issue the Air Construction Permit and the Title V Air Operation Permit based on the belief that reasonable assurances have been provided to indicate that the construction activity and operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C. Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "**PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT.**" The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office, PPRAQD, One North University Drive, Suite: 203, Plantation, Florida 33324 (Telephone: 954/519-1260), within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication may result in the denial of the permits pursuant to Rule 62-110.106(11), F.A.C.

The permitting authority will issue the Air Construction Permit and the PROPOSED Title V Air Operation Permit and subsequent FINAL Title V Air Operation Permit, in accordance with the conditions of the attached Draft Air Construction Permit and the DRAFT Title V Air Operation Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

The permitting authority will accept written comments concerning the proposed Title V Air Operation Permit Revision issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Title V Air Operation Permit, the permitting authority shall issue a Revised DRAFT Title V Air Operation Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of the Broward County Attorney at 115 S. Andrews Avenue, Room: 423, Fort Lauderdale, Florida 33301-1872 (Telephone: 954/357-7600, Fax: 954/357-7641). Petitions filed by the permits's (construction and revision) applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when each petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application(s) have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Title V permit. Any petition shall be based only on objections to the Title V permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any Title V permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d (b) (2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

Executed in Plantation, Florida.

POLLUTION PREVENTION, REMEDIATION
AND AIR QUALITY DIVISION



Daniela Banu
Air Quality Program Administrator

DRAFT Air Construction Permit No.: 0112706-003-AC
DRAFT Title V Air Operation Permit No.: 0112706-004-AV
Page 4 of 4

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT (including the combined PUBLIC NOTICE, the DRAFT Air Construction Permit and the DRAFT Title V Air Operation Permit package) and all copies were sent electronically (with Received Receipt) before the close of business on October 12, 2012 to the person(s) listed:

Thamer Azule-Wright, Zumro Manufacturing, Inc. via e-mail (thamer@zumro.com)
Veronica Pickett, EPAC Environmental Services, Inc. via e-mail (vpickett@epacinc.com)

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT (including the combined PUBLIC NOTICE, the Draft Air Construction Permit and the DRAFT Title V Air Operation Permit) were sent electronically (with Received Receipt) on the same date to the person(s) listed or as otherwise noted:

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

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT (including the Draft Air Construction Permit and the DRAFT Title V Air Operation Permit package) were sent electronically (with Received Receipt) on the same date to the person listed or as otherwise noted:

Lee Hoefert, P.E., SFDEP, Air Section via e-mail (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)

10/12/12
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT

BROWARD COUNTY POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION

DRAFT Air Construction Permit No.: 0112706-003-AC
DRAFT Title V Air Operation Permit Project No.: 0112706-004-AV
Zumro Manufacturing, Inc.
Broward County

The Pollution Prevention, Remediation and Air Quality Division (PPRAQD) (permitting authority) gives notice of its intent to issue an Air Construction Permit and the initial Title V Air Operation Permit to, Ms. Thamer Azule-Wright, Human Resources Director, Zumro Manufacturing, Inc. for their temporary inflatable shelters and rescue pods manufacturing operation located at 650 S.W. 16th Terrace, Pompano Beach, Broward County. The applicant's name and address are: Ms. Thamer Azule-Wright, Human Resources Director, Zumro Manufacturing, Inc., 650 S.W. 16th Terrace, Pompano Beach, Florida 33069.

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 more detailed recordkeeping requirements.

This is the initial TV Permit because the facility exceeded the single HAP (toluene) emissions limit of 10 tons/year set in the FESOP, No., 0112706-001-AF.

The permitting authority will issue the Air Construction Permit and the PROPOSED Title V Air Operation Permit and subsequent FINAL Title V Air Operation Permit, in accordance with the conditions of the Draft Air Construction Permit and the DRAFT Title V Air Operation Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Draft Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice. Written comments should be provided to the One North University Drive, Suite: 203, Plantation, Florida 33324. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

The Permitting Authority will accept written comments concerning the DRAFT Title V Air Operation Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked and all facsimile comments must be received by the close of business (5:00 pm), on or before the end of this 30-day period, by the Permitting Authority at PPRAQD, One North University Drive, Suite: 203, Plantation, Florida 33324 (Telephone: 954/519-1260). As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (<http://faw.dos.state.fl.us/>) and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT Title V Air Operation Permit, the Permitting Authority shall issue a Revised DRAFT Title V Air Operation Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of the Broward County Attorney at 115 S. Andrews Avenue, Room: 423, Fort Lauderdale, Florida 33301-1872 (Telephone: 954/357-7600, Fax: 954/357-7641). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 (fourteen) days of publication of the public notice or

within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;

(c) A statement of how and when the petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application(s) have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Title V permit. Any petition shall be based only on objections to the Title V permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any Title V permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d (b) (2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Pollution Prevention, Remediation and Air Quality Division
One North University Drive, Suite: 203
Plantation, Florida 33324
Telephone: 954/519-1260
Fax: 954/519-1495

The complete project file includes the Technical Evaluation and Preliminary Determination and associated DRAFT Air Construction Permit and DRAFT Title V Air Operation Permit, the application(s), and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Ms. Olga M. Ibarra, P.E., at the above address, or call 954/519-1260, for additional information.

Zumro Manufacturing, Inc.
Facility ID No. 0112706
Broward County

Initial Title V Air Operation Permit

DRAFT Permit No.: 0112706-004-AV

Permitting and Compliance Authority:

Pollution Prevention, Remediation and Air Quality Division
One North University Drive, Suite: 203
Plantation, Florida 33324-2038
Telephone: 954-519-1260
Fax: 954-519-1495

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DRAFT PERMIT

PERMITTEE:

Zumro Manufacturing, Inc.
650 S.W. 16th Terrace
Pompano Beach, Florida 33069

Permit No. 0112706-004-AV
Zumro Manufacturing, Inc.
Facility ID No. 0112706
Initial Title V Air Operation Permit

The purpose of this permit is for the Initial Title V air Operation permit for the above referenced facility. The Zumro Manufacturing, Inc. is located in Broward County at 650 S.W. 16th Terrace, Pompano Beach Florida. UTM Coordinates are: Zone 17, 585.54 Km East and 2900.56Km North. Latitude is: 26° 13' 19.5"; and, Longitude is: 80°8' 37.2" West. SIC code: 2399.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date:
Renewal Application Due Date:
Expiration Date:

Broward County, Pollution Prevention and Air
Quality Division

Daniela Banu
Air Quality Program Administrator

DB/omi

SECTION I. FACILITY INFORMATION.

Subsection A. 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.

The facility has an Operation and Maintenance Plan which 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. This facility does not have miscellaneous unregulated/ insignificant emissions units and/or activities.

Based on the initial Title V permit application received electronically via EPSAP on July 30, 2012, this facility is a major source of HAP. Compliance Assurance Monitoring (CAM) rule does not apply.

Subsection B. Summary of Emissions Units.

EU 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.
<i>Unregulated Emissions Units and Activities</i>	
	None

Subsection C. Applicable Regulations

Based on the Title V air operation permit application received electronically via EPSAP on July 30, 2012; and the construction permit application received via regular mail August 20, 2012, this facility is a major source of hazardous air pollutants (HAP). This operation is not subject to any National Emissions Standards of Hazardous Air Pollutants (NESHAPS) – 40 CFR 63.

Subsection D. Relevant Documents

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

SECTION I. FACILITY INFORMATION.

These documents are provided to the permittee for information purposes only:

Appendix A .Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1: Permit History

Statement of Basis

These documents are on file with permitting authority:

Initial Title V Permit Application received electronically via EPSAP July 30, 2012.

Construction Permit Application received via regular mail August 20, 2012.

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General 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 process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.

FW4. 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.

- a. Tightly cover or close all VOC containers when they are not in use;
 - b. Tightly cover all open tanks, which contain VOCs when they are not in use;
 - c. Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition;
 - d. Confine rags used with VOCs to tightly closed, fireproof containers when not in use;
- and,
- e. 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., 0112706-003-AC]

FW4. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter 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 to prevent emissions of unconfined particulate matter at this facility include:

- 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), F.A.C., Permit No. 0112706-003-AC]

SECTION II. FACILITY-WIDE CONDITIONS.

Annual Reports and Fees

FW5. 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>}

FW 6. 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, F.A.C.]

FW 7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3) (a) 2. & 3. and (3) (b), F.A.C.]

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

- a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
- b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

FW9. General Prohibitions.

- a) 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.
- b) 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 could otherwise constitute a violation of any provisions of Broward County Code.
- c) Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Code.

[Rule 62-210.650, F.A.C., Broward County Code, Sec. 27-175(b) and (d)]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

The specific conditions in this section apply to the following emissions unit:

EU 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.

Recordkeeping and Reporting Requirements

A.1 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., Permit No. 0112706-003-AC]

A.2. 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., Permit No. 0112706-003-AC]

A.3 A log shall be kept to document the amount of chemicals manifested to recyclers, the manufacturer, or landfilled.

[Rule 62-4.070(3) F.A.C., Permit No. 0112706-003-AC]

A.4 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:

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 001

Table A.1. Dates for Semiannual Monitoring Reports

Reporting Period	Report Deadline
July through December	January 31 st
January through June	January through June July 31 st

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

A.5. 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]

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

- Appendix TV- 5, TITLE V General Conditions (version dated 02/16/2012)
- Appendix H-1: Permit History
- Appendix A: Abbreviations, Acronyms, Citations, and Identification Numbers
- Appendix B. Operation and Maintenance Plan

STATEMENT OF BASIS

Zumro Manufacturing Inc.
Pompano Beach, Florida
Broward County, Florida

Initial Title V Air Operation Permit

DRAFT Permit Project No.: 0112706-004-AV

APPLICANT

The applicant for this project is Zumro Manufacturing, Inc. The applicant's responsible official and mailing address are: Ms. Thamer Azule-Wright, Human Resources Director at 650 S.W. 16th Terrace, Pompano Beach, Florida 33069-4533.

FACILITY DESCRIPTION

Zumro Manufacturing, Inc. is a manufacturer of temporary inflatable shelters and rescue pods. This facility uses a significant amount of toluene. As part of the manufacturing process, adhesives containing EPA Hazardous Air Pollutants identified as toluene, hexane and methanol are applied to the inflatable material(s). This operation is not equipped with air pollution control equipment, as only fugitive emissions occur during the application of adhesives. The operation requires adhesives application and it is performed as follows: adhesive containers are removed from the hazardous materials storage area, as needed, opened and applied to the inflatable material. This process releases fugitive emissions. 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 to this operation.

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

The facility previously operated as a Synthetic Minor Source with the following emissions limits: 25 TPY of Total HAP, 10 TPY of individual HAP and 100 TPY of VOC. Since this facility exceeded the individual HAP emissions limit of 10 tons/year for toluene, set in the FESOP, 0112706-001-AF, it is currently a Title V Major Source; and these emissions limits are no longer necessary. Therefore, the construction permit appropriately modifies the facility's emissions limits.

This permit does not include miscellaneous insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to obtain the initial TV air operation permit. No modification(s) from previous permit (0112706-001-AF) is/are requested.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

STATEMENT OF BASIS

on August 20, 2012. At that time, the permit application process was initiated. The professional engineer authentication code and R.O. certification were received September 19, 2012.

PRIMARY REGULATORY REQUIREMENTS

Broward County Chapter 27 – Pollution Control, Article IV Air Quality

Florida Administrative Code

62.4.070(3) – Reasonable Assurance

62-296.320(2) - Objectionable Odor Rule.

62-296.320(1) (a) – VOC or Organic Solvent Emissions.

Federal Regulations

There is a NESHAP/MACT that this operation would be subject at the present time.

CAM Rule Applicability Analysis:

CAM applies to each pollutant specific emissions unit that meets the four criteria listed below:

1. The emissions unit (EU) must be located at a major source which is required to have a major source (Title V) permit: EU #001 is located at a major source (TV source) for HAP.
2. The EU must be subject to emissions limitations or standards for an applicable regulated air pollutant. This includes a limit set in a permit condition. EU #001 is not subject to a NESHAP or any other EPA/DEP promulgated rule. EU #001 does not have an emissions cap for toluene or any other HAP subject to a specific applicable rule.
3. The EU must use an add-on control device to achieve compliance with an emission limit or standard. EU #001 is not equipped with a pollution control device to achieve compliance.
4. The EU must have “potential pre-control device emissions” equal to or greater than the amount required for a source to be classified as a major source in the Title V Program. Typically, this means uncontrolled emissions would exceed 100 tons per year for a criteria pollutant, or exceed 10 tons per year for a hazardous air pollutant. All emissions are uncontrolled, since this operation does not have pollution control device. The potential HAP emissions exceed the major source threshold.

CAM rule requires owners or operators to monitor the operation and maintenance of their control device(s) and report whether or not their facilities meet emissions standards. This facility does not meet the four criteria; therefore CAM does not apply at this time.

PROJECT REVIEW

This project is to obtain the initial TV air operation permit.

STATEMENT OF BASIS

The facility consists of the following emissions unit:

<u>E.U. ID No.</u>	<u>Brief Description</u>
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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.
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CONCLUSION

Based on the FESOP issued November 6, 2008, this facility was a Synthetic Major Source of HAP and the Title III program. The facility exceeded the single HAP emissions limit of 10 tons/year verified through the 2011 Annual Operation Report (AOR) and it is now required to obtain a major source (TV) permit. Zumro Manufacturing, Inc. becomes a major source under the Title V Operating Permit Program. Compliance Assurance Monitoring (CAM) does not apply.

This initial Title V Air Operation Permit 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.

APPENDIX A

ABBREVIATIONS, ACRONYMS, CITATIONS AND IDENTIFICATION NUMBERS

Abbreviations and Acronyms:

° F: degrees Fahrenheit	ID: identification
acfm: actual cubic feet per minute	ISO: International Standards Organization (refers to those conditions at 288 Kelvin, 60% relative humidity and 101.3 kilopascals pressure.)
AOR: Annual Operating Report	kPa: kilopascals
ARMS: Air Resource Management System (Department's database)	LAT: Latitude
BACT: best available control technology	lb: pound
Btu: British thermal units	lbs/hr: pounds per hour
CAA: Clean Air Act	LONG: Longitude
CAAA: Clean Air Act Amendments of 1990	MACT: maximum achievable technology
CAM: compliance assurance monitoring	mm: millimeter
CEMS: continuous emissions monitoring system	MMBtu: million British thermal units
cfm: cubic feet per minute	MSDS: material safety data sheets
CFR: Code of Federal Regulations	MW: megawatt
CO: carbon monoxide	NESHAP: National Emissions Standards for Hazardous Air Pollutants
COMS: continuous opacity monitoring system	NO_x: nitrogen oxides
DARM: Division of Air Resources Management	NSPS: New Source Performance Standards
DCA: Department of Community Affairs	O&M: operation and maintenance
DEP: Department of Environmental Protection	O₂: oxygen
Department: Department of Environmental Protection	ORIS: Office of Regulatory Information Systems
dscfm: dry standard cubic feet per minute	OS: Organic Solvent
EPA: Environmental Protection Agency	Pb: lead
ESP: electrostatic precipitator (control system for reducing particulate matter)	PM: particulate matter
EU: emissions unit	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
F.A.C.: Florida Administrative Code	PSD: prevention of significant deterioration
F.D.: forced draft	psi: pounds per square inch
F.S.: Florida Statutes	PTE: potential to emit
FGR: flue gas recirculation	RACT: reasonably available control technology
Fl: fluoride	RATA: relative accuracy test audit
ft²: square feet	RMP: Risk Management Plan
ft³: cubic feet	RO: Responsible Official
gpm: gallons per minute	SAM: sulfuric acid mist
gr: grains	scf: standard cubic feet
HAP: hazardous air pollutant	scfm: standard cubic feet per minute
Hg: mercury	SIC: standard industrial classification code
I.D.: induced draft	

APPENDIX A

ABBREVIATIONS, ACRONYMS, CITATIONS AND IDENTIFICATION NUMBERS

SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)

SOA: Specific Operating Agreement

SO₂: sulfur dioxide

TPH: tons per hour

TPY: tons per year

UTM: Universal Transverse Mercator coordinate system

VE: visible emissions

VOC: volatile organic compounds

x: By or times

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers and ID numbers.

Code of Federal Regulations:

Example: [40 CFR 60.334]

Where:	40	refers to	Title 40
	CFR	refers to	Code of Federal Regulations
	60	refers to	Part 60
	60.334	refers to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: [Rule 62-213.205, F.A.C.]

Where:	62	refers to	Title 62
	62-213	refers to	Chapter 62-213
	62-213.205	refers to	Rule 62-213.205, F.A.C.

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

*Example: 1050221-002-AV, or
1050221-001-AC*

APPENDIX A

ABBREVIATIONS, ACRONYMS, CITATIONS AND IDENTIFICATION NUMBERS

Where:

- AC = Air Construction Permit
- AV = Air Operation Permit (Title V Source)
- 105 = 3-digit number code identifying the facility is located in Polk County
- 0221= 4-digit number assigned by permit tracking database
- 001 or 002= 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

- PSD = Prevention of Significant Deterioration Permit
- PA = Power Plant Siting Act Permit
- AC53 = old Air Construction Permit numbering identifying the facility is located in Polk County

APPENDIX B

Operation and Maintenance Plan

The owner or operator of this facility will review and evaluate this Spill Prevention and Control Plan every twelve months.

Revisions to this plan will be completed within three months of any commencement of construction, closure or alteration of any facility or alteration of the operating procedures at that facility that may cause or be a source of air pollution, or that may eliminate, reduce or control pollution of the air.

Changes requiring amendment to this plan include, but are not limited to the following conditions:

- the facility permit is revised;
- the plan fails;
- the facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for air pollution;
- standard operation or maintenance procedures at the facility are revised to include more effective control technology if such technology will significantly reduce the likelihood of air pollution and if such technology has been field proven at the time of the review.

Records regarding all aspects of this operation and maintenance plan will be retained by the facility owner for a period of five years.

General Information

This facility operates as a manufacturer of temporary inflatable shelters and rescue pods. As part of the manufacturing process, adhesives containing EPA Hazardous Air Pollutants identified as toluene, hexane and methanol are applied to the inflatable material(s). The adhesive application releases fugitive emissions of these volatile organic compounds (VOCs).

Operation Plan

- Adhesive application is only to be performed at designated adhesive application areas within the facility building. No adhesive use is permitted outside of these designated areas.
- Adhesive application is limited to normal facility operating hours with employee supervision provided by a designated manager/supervisor.
- All employees authorized to perform adhesive application must be trained as to the proper use, storage and handling procedures.
- Records of employee training should be maintained on-site and readily available for review by a regulatory official.

Maintenance Plan

- All adhesive containers shall be stored within a flame retardant cabinet.
- All adhesive containers shall be properly sealed to eliminate the potential for fugitive emissions when not in use.

- Adhesive storage cabinets shall be properly maintained and inspected by managing personnel on a weekly basis.
- Records of spills, leaks or cabinet replacement(s) shall be maintained on-site and readily available for review by a regulatory official.

TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

Operation

- TV1. General Prohibition.** A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit. [Rule 62-4.030, Florida Administrative Code (F.A.C.)]
- TV2. 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 Department. [Rule 62-4.160(2), F.A.C.]
- TV3. Proper 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 Department rules. This provision includes 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 Department rules. [Rule 62-4.160(6), F.A.C.]
- TV4. Not Federally Enforceable. Health, Safety and Welfare.** To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. [Rule 62-4.050(3), F.A.C.]
- TV5. Continued Operation.** An applicant making timely and complete application for permit, or for permit renewal, shall continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, and in accordance with applicable requirements of the Acid Rain Program and applicable requirements of the CAIR Program, until the conclusion of proceedings associated with its permit application or until the new permit becomes effective, whichever is later, provided the applicant complies with all the provisions of subparagraphs 62-213.420(1)(b)3., F.A.C. [Rules 62-213.420(1)(b)2., F.A.C.]
- TV6. Changes Without Permit Revision.** Title V sources having a valid permit issued pursuant to Chapter 62-213, F.A.C., may make the following changes without permit revision, provided that sources shall maintain source logs or records to verify periods of operation:
- a. Permitted sources may change among those alternative methods of operation allowed by the source's permit as provided by the terms of the permit;
 - b. A permitted source may implement operating changes, as defined in Rule 62-210.200, F.A.C., after the source submits any forms required by any applicable requirement and provides the Department and EPA with at least 7 days written notice prior to implementation. The source and the Department shall attach each notice to the relevant permit;
 - (1) The written notice shall include the date on which the change will occur, and a description of the change within the permitted source, the pollutants emitted and any change in emissions, and any term or condition becoming applicable or no longer applicable as a result of the change;
 - (2) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes;
 - c. Permitted sources may implement changes involving modes of operation only in accordance with Rule 62-213.415, F.A.C.
- [Rule 62-213.410, F.A.C.]
- TV7. Circumvention.** No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

Compliance

- TV8. Compliance with Chapter 403, F.S., and Department Rules.** Except as provided at Rule 62-213.460, Permit Shield, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules. [Rule 62-4.070(7), F.A.C.]

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TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

- TV9. Compliance with Federal, State and Local Rules.** Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of a facility or an emissions unit from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Department or any other such requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
- TV10. Binding and enforceable.** 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 Department will review this permit periodically and may initiate enforcement action for any violation of these conditions. [Rule 62-4.160(1), F.A.C.]
- TV11. Timely information.** When requested by the Department, 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 Department, such facts or information shall be corrected promptly. [Rule 62-4.160(15), F.A.C.]
- TV12. Halting or reduction of source activity.** It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity. [Rule 62-213.440(1)(d)3., F.A.C.]
- TV13. Final permit action.** Any Title V source shall comply with all the terms and conditions of the existing permit until the Department has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C. [Rule 62-213.440(1)(d)4., F.A.C.]
- TV14. Sudden and unforeseeable events beyond the control of the source.** A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference. [Rule 62-213.440(1)(d)5., F.A.C.]
- TV15. Permit Shield.** Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall, as of the effective date of the permit, be deemed compliance with any applicable requirements in effect, provided that the source included such applicable requirements in the permit application. Nothing in this condition or in any permit shall alter or affect the ability of EPA or the Department to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program or the CAIR Program. [Rule 62-213.460, F.A.C.]
- TV16. Compliance With Federal Rules.** A facility or emissions unit subject to any standard or requirement of 40 CFR, Part 60, 61, 63 or 65, adopted and incorporated by reference at Rule 62-204.800, F.A.C., shall comply with such standard or requirement. Nothing in this chapter shall relieve a facility or emissions unit from complying with such standard or requirement, provided, however, that where a facility or emissions unit is subject to a standard established in Rule 62-296, F.A.C., such standard shall also apply. [Rule 62-296.100(3), F.A.C.]

Permit Procedures

- TV17. Permit Revision Procedures.** The permittee shall revise its permit as required by Rules 62-213.400, 62-213.412, 62-213.420, 62-213.430 & 62-4.080, F.A.C.; and, in addition, the Department shall revise permits as provided in Rule 62-4.080, F.A.C. & 40 CFR 70.7(f).
- TV18. Permit Renewal.** The permittee shall renew its permit as required by Rules 62-4.090, 62.213.420(1) and 62-213.430(3), F.A.C. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information

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identified in Rules 62-210.900(1) [Application for Air Permit - Long Form], 62-213.420(3) [Required Information], 62-213.420(6) [CAIR Part Form], F.A.C. Unless a Title V source submits a timely and complete application for permit renewal in accordance with the requirements this rule, the existing permit shall expire and the source's right to operate shall terminate. 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. No Title V permit will be issued for a new term except through the renewal process. [Rules 62-213.420 & 62-213.430, F.A.C.]

TV19. Insignificant Emissions Units or Pollutant-Emitting Activities. The permittee shall identify and evaluate insignificant emissions units and activities as set forth in Rule 62-213.430(6), F.A.C.

TV20. Savings Clause. If any portion of the final permit is invalidated, the remainder of the permit shall remain in effect. [Rule 62-213.440(1)(d)1., F.A.C.]

TV21. Suspension and Revocation.

- a. Permits shall be effective until suspended, revoked, surrendered, or expired and shall be subject to the provisions of Chapter 403, F.S., and rules of the Department.
- b. Failure to comply with pollution control laws and rules shall be grounds for suspension or revocation.
- c. A permit issued pursuant to Chapter 62-4, F.A.C., shall not become a vested property right in the permittee. The Department may revoke any permit issued by it if it finds that the permit holder or his agent:
 - (1) Submitted false or inaccurate information in his application or operational reports.
 - (2) Has violated law, Department orders, rules or permit conditions.
 - (3) Has failed to submit operational reports or other information required by Department rules.
 - (4) Has refused lawful inspection under Section 403.091, F.S.
- d. No revocation shall become effective except after notice is served by personal services, certified mail, or newspaper notice pursuant to Section 120.60(5), F.S., upon the person or persons named therein and a hearing held if requested within the time specified in the notice. The notice shall specify the provision of the law, or rule alleged to be violated, or the permit condition or Department order alleged to be violated, and the facts alleged to constitute a violation thereof.

[Rule 62-4.100, F.A.C.]

TV22. Not federally enforceable. Financial Responsibility. The Department may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and Department rules. [Rule 62-4.110, F.A.C.]

TV23. Emissions Unit Reclassification.

- a. Any emissions unit whose operation permit has been revoked as provided for in Chapter 62-4, F.A.C., shall be deemed permanently shut down for purposes of Rule 62-212.500, F.A.C. Any emissions unit whose permit to operate has expired without timely renewal or transfer may be deemed permanently shut down, provided, however, that no such emissions unit shall be deemed permanently shut down if, within 20 days after receipt of written notice from the Department, the emissions unit owner or operator demonstrates that the permit expiration resulted from inadvertent failure to comply with the requirements of Rule 62-4.090, F.A.C., and that the owner or operator intends to continue the emissions unit in operation, and either submits an application for an air operation permit or complies with permit transfer requirements, if applicable.
- b. If the owner or operator of an emissions unit which is so permanently shut down, applies to the Department for a permit to reactivate or operate such emissions unit, the emissions unit will be reviewed and permitted as a new emissions unit.

[Rule 62-210.300(6), F.A.C.]

TV24. Transfer of Permits. Per Rule 62-4.160(11), F.A.C., this permit is transferable only upon Department approval in accordance with Rule 62-4.120, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility. The permittee shall also comply with the

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requirements of Rule 62-210.300(7), F.A.C., and use DEP Form No. 62-210.900(7). [Rules 62-4.160(11), 62-4.120, and 62-210.300(7), F.A.C.]

Rights, Title, Liability, and Agreements

TV25. Rights. As provided in Subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department 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.]

TV26. Title. 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 interests 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.)]

TV27. 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 F.S. and Department rules, unless specifically authorized by an order from the Department. [Rule 62-4.160(5), F.A.C.]

TV28. Agreements.

- a. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - (1) Have access to and copy any records that must be kept under conditions of the permit;
 - (2) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
 - (3) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
- b. In 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 source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- c. The permittee agrees to comply with changes in Department 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 Department rules.

[Rules 62-4.160(7), (9), and (10), F.A.C.]

Recordkeeping and Emissions Computation

TV29. Permit. The permittee shall keep this permit or a copy thereof at the work site of the permitted activity. [Rule 62-4.160(12), F.A.C.]

TV30. Recordkeeping.

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- 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 recordings 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 five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:

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- (1) The date, exact place, and time of sampling or measurements, and the operating conditions at the time of sampling or measurement;
- (2) The person responsible for performing the sampling or measurements;
- (3) The dates analyses were performed;
- (4) The person and company that performed the analyses;
- (5) The analytical techniques or methods used;
- (6) The results of such analyses.

[Rules 62-4.160(14) and 62-213.440(1)(b)2., F.A.C.]

TV31. Emissions Computation. Pursuant to Rule 62-210.370, F.A.C., the following required methodologies are to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with Rule 62-210.370, F.A.C. Rule 62-210.370, F.A.C., is not intended to establish methodologies for determining compliance with the emission limitations of any air permit.

For any of the purposes specified above, the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.

- a. *Basic Approach.* The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
 - (1) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 - (2) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (3) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- b. *Continuous Emissions Monitoring System (CEMS).*
 - (1) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - (a) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or,
 - (b) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
 - (2) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - (a) A calibrated flowmeter that records data on a continuous basis, if available; or

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- (b) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (3) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- c. *Mass Balance Calculations.*
- (1) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
- (a) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and,
- (b) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
- (2) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
- (3) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- d. *Emission Factors.*
- (1) An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
- (a) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (b) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
- (c) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
- (2) If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- e. *Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS.* In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of

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missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.

- f. *Accounting for Emissions During Periods of Startup and Shutdown.* In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- g. *Fugitive Emissions.* In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- h. *Recordkeeping.* The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(1) & (2), F.A.C.]

Responsible Official

TV32. Designation and Update. The permittee shall designate and update a responsible official as required by Rule 62-213.202, F.A.C.

Prohibitions and Restrictions

TV33. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

TV34. Refrigerant Requirements. Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed at 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or Class II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts B and F, and with Chapter 62-281, F.A.C.

TV35. Open Burning Prohibited. Open burning is prohibited unless performed in accordance with the provisions of Rule 62-296.320(3) or Chapter 62-256, F.A.C.

Appendix H-1: Permit History

[Zumro Manufacturing, Inc.]
[Zumro Manufacturing – Pompano Beach]

DRAFT Permit No.: [0112706-004-AV]
Facility ID No.: [0112706]

E.U. ID No.	Description	Permit No.	Effective Date	Expiration Date	Project Type ¹
001	Temporary Inflatables Shelters and Rescue Pods Manufacturing Operation.	[0112706-001-AF]	November 6, 2008	June 11 ,2012	FESOP (Initial)
001	Temporary Inflatables Shelters and Rescue Pods Manufacturing Operation.	[0112706-004-AV]	xxx/xx/xxxx	xxx/xx/xxxx	TV Initial
001	Temporary Inflatables Shelters and Rescue Pods Manufacturing Operation.	[0112706-003-AC]	xxx/xx/xxxx	August 20/2013	Construction Permit

¹ Project Type (select one): Title V: Initial, Revision, Renewal, or Admin. FESOP, Correction; Construction (new or mod.); or, Extension (AC only).



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

NOTICE OF FINAL PERMIT

DRAFT

Ms. Thamer Azule – Wright, Human Resources Director
Zumro Manufacturing, Inc.
650 S.W. 16th 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

Daniela Banu, Air Quality Administrator

CONFIDENTIAL

DRAFT

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED

The following information is being provided to you for your information only. It is not intended to be used for any other purpose. This information is confidential and its disclosure is restricted to those individuals who have been authorized to receive it. It is the policy of the Department of Justice to protect the confidentiality of this information. Any unauthorized disclosure of this information is prohibited. This information is being provided to you for your information only. It is not intended to be used for any other purpose. This information is confidential and its disclosure is restricted to those individuals who have been authorized to receive it. It is the policy of the Department of Justice to protect the confidentiality of this information. Any unauthorized disclosure of this information is prohibited.

CONFIDENTIAL

CONFIDENTIAL

CERTIFICATE OF SERVICE

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

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

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

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

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

DRAFT

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)



Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
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:
Expiration Date: August 20, 2013
County: Broward

DRAFT

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 42nd 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

DRAFT

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	<p style="text-align: center; color: red; font-weight: bold; font-size: 2em;">DRAFT</p> <p>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.</p>

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 st
January through June	January through June July 31 st

[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.]