Title V Air Operation Permit Renewal
Permit No. 0250991-005-AV

APPLICANT

The applicant for this project is Blumberg Industries d/b/a Fine Art Lamps. The applicant's responsible official and mailing address are: Laura Goldblum, President and Chief Financial Officer, Fine Art Lamps facility, 5572 Miami Lakes Drive East, Miami Lakes, FL 33014.

FACILITY DESCRIPTION

The applicant operates the Fine Art Lamps facility, which is located at 5572 Miami Lakes Drive East in Miami, and 7215 West 20 Avenue, Hialeah, Florida.

This facility consists of the following emissions units:

EU No.	Brief Description
003	Resin Casting Operations, Hialeah Plant, Building No. 1 (R)
004	Coating Applications: Foam & Manufacturing Operations, Hialeah Plant, Building Nos. 1 & 2 (U)
005	Metals Parts Washer/Dip Tank, Miami Lakes Plant, Building No. 6 (R)
006	Paint Coating Processes-Spray & Hand Application, Miami Lakes Plant, Building No. 6 (R)
007	One (1) Emergency Diesel Generator, Miami Lakes Plant (U)

This facility engages in lamp manufacturing operations at two, interdependent locations in Miami-Dade County. Initial manufacturing operations are conducted at the Hialeah plant. Products, as work-in-process, are transferred to the Miami Lakes location for further manufacturing, final assembly and shipping. Facility operations include resin casting, metalworking, glass blowing, and surface coating. The company produces a broad range of lighting products including chandeliers, table lamps, and sconces. The resins, paints, coatings, thinners, and solvents used in casting and coating operations contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

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

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V Air Operation Permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received April 3, 2013.
Additional Information Request dated April 24, 2013.
Additional Information Response received May 24, 2013.
Additional Information Request dated June 14, 2013.
Additional Information Response received August 6, 2013.
Waiver of 90 Day Time Limit for Issuance of Permit received November 4, 2013.

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

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

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

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63; Subpart RRRR – NESHAP for Surface Coating of Metal Furniture, and Subpart WWWW – NESHAP for Reinforced Plastic Composites Production.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply.

PROJECT REVIEW

Specific changes were made to the previous Title V Air Operation Permit No. 0250991-004-AV, and are in this FINAL Title V Air Operation Permit Renewal. Such changes include FDEP reformatting of the entire permit document, replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, etc.

For example, some of the recordkeeping, and testing requirements that were previously listed under TV-6, (i.e. administrative permit corrections, deviation reports, etc.) and the Facility-Wide Conditions, and Specific Conditions under the previous Title V permit (i.e. certification by responsible official, testing, submittal of monitoring reports, statement of compliance, etc.) are now listed under the new Appendix RR – Facility-Wide Reporting Requirements, and Appendix TR – Facility-Wide Testing Requirements.

Additionally, recent organizational changes have occurred within the Miami-Dade County Government and the Department of Environmental Resources Management (DERM) was merged with two (2) other departments. The consolidated name is now the Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management. As a result, some references to DERM in the permit have been changed to RER.
Items numbered 1 – 6 below represent the changes to the previous Title V Air Operation Permit. Underline text indicates additions. ~~Strikethrough indicates text removed.~~

1. Changes in Section III – Subsection A, B, C, D & E, Emissions Unit Description. The applicant stated in the application that Building No. 3 at the Hialeah Plant was closed and the equipment was moved to Building No. 1. Also, there have been some changes to the equipment listing for the various emissions units since the issuance of the current Title V air operation permit. The paint spray booths have been re-numbered, and now tabulated for clarity. Emissions unit No. 7 is a new emissions unit that addresses one (1) emergency diesel generator as an unregulated emissions unit. Accordingly, the emissions units have been updated as follows:

EU No.	Brief Description
003	**Resin Casting Operations (R)** Hialeah Plant, Building No. 1 Polyester resin mixing, closed mold process, curing, natural gas fueled drying oven.
004	**Coating Applications, Foam & Glass Manufacturing Operations (U)** Hialeah Plant, Building Nos. 1 & 2

Coating Applications:
Mold-release Coatings Spray Booths

Booth No.	Manufacturer	Model No.	Dimensions	Exhaust Fan
SB-150-48	Unknown	N/A	48”W x52”H x 40”D	1HP, 24” diameter with 5,484 CFM
SB-175-01	Unknown	N/A	72”W x96”H x 84”D	1HP, 24” diameter with 5,484 CFM

Glass Manufacturing Ovens:
Four (4) Commercial Decal, Inc. manufactured closed envelope kilns to slow cool glass
Two (2) “slumping” ovens to heat glass for shaping (2 ceramic kiln natural gas ovens)
Three (3) electric hex kilns
Two (2) electric oval kilns
Two (2) Falomi Glass Furnaces (natural gas)
Foam Manufacturing Process:
Foam injection molding, heat pressed, removed to cool & cure

005 **Metals Parts Washer (R)**
Miami Lakes Plant, Building No.6
Metal tank with cover
Dimensions: 80”L x 24”W x 8.5”H
Solvent/air interface: 13.4 sq ft

006 **Paint Coating Processes - Spray and Hand Application (R)**
Miami Lakes Plant, Building No. 6
15 Paint Spray Booths with two (2) Drying Ovens

Metal Prep Department: Base coat spray booths with natural gas fueled drying oven

Booth No.	Manufacturer	Model No.	Dimensions	Exhaust Fan
SB-110-01	Unknown	N/A	92”W x94”H x 57”D	1.5HP, 30” diameter with 14,995 CFM
SB-110-02	Panam Air Conditioning Co.	N/A	98”W x95”H x 94”D	5HP, 30” diameter with 14,995 CFM
SB-110-03	Panam Air Conditioning Co.	N/A	168”W x96”H x 93”D	3HP, 34” diameter with 13,965 CFM
SB-110-05	Panam Air Conditioning Co.	N/A	168”W x96”H x 96”D	3HP, 30” diameter with 12,220 CFM
SB-110-06	Panam Air Conditioning Co.	N/A	168”W x96”H x 96”D	5HP, 30” diameter with 14,995 CFM
SB-110-07	Panam Air Conditioning Co.	N/A	97”W x93”H x 96”D	2HP, 30” diameter with 9,990 CFM
SB-110-08	Panam Air Conditioning Co.	N/A	168”W x93”H x 96”D	3HP, 36” diameter with 14,450 CFM

Finishing Department: Final coat spray booths with natural gas fueled drying oven

Booth No.	Manufacturer	Model No.	Dimensions	Exhaust Fan
SB-110-01	Unknown	N/A	92”W x94”H x 57”D	1.5HP, 30” diameter with 14,995 CFM
SB-110-02	Panam Air Conditioning Co.	N/A	98”W x95”H x 94”D	5HP, 30” diameter with 14,995 CFM
SB-110-03	Panam Air Conditioning Co.	N/A	168”W x96”H x 93”D	3HP, 34” diameter with 13,965 CFM

	SB-110-05	Panam Air Conditioning Co.	N/A	168”W x96”H x 96”D	3HP, 30” diameter with 12,220 CFM
	SB-110-06	Panam Air Conditioning Co.	N/A	168”W x96”H x 96”D	5HP, 30” diameter with 14,995 CFM
	SB-110-07	Panam Air Conditioning Co.	N/A	97”W x93”H x 96”D	2HP, 30” diameter with 9,990 CFM
	SB-110-08	Panam Air Conditioning Co.	N/A	168”W x93”H x 96”D	3HP, 36” diameter with 14,450 CFM
007	**One (1) Diesel Generator (U)** Manufacturer: Caterpillar Model No. 3-R-4 Serial No. 5NA05293 Displacement: 2.25 Horsepower: 670 Rating: 500 kW1 Date of Manufacture: 9/27/1985				

2. Changes in Section III – Subsection A, Emissions Unit and Specific Conditions, Emissions Unit 003 – Resin Casting Operations. Appendix W – Tables 1-14 of 40 CFR 63 Subpart WWWW – NESHAP for Reinforced Plastic Composites Production has been removed from the permit since the complete 40 CFR 63 Subpart WWWW has been attached to the permit as Appendix NESHAP, Subpart WWWW. Therefore, all references to Appendix W Tables have been removed from the permit.

3. At the time of issuance of the Draft permit, the facility has not established compliance with the organic HAP emissions limit of 0.10 kg organic HAP per liter (0.83 lb/gal) of 40 CFR 63 subpart RRRR – NESHAP for Surface Coating of Metal Furniture as stated in Specific Condition No. D.3. of permit No. 0250991-004-AV for some of their products. Also, the facility has not established compliance with the VOC reasonable available control technology (RACT) limit of 4.3 pounds per gallon of coating (0.42 kilograms per liter), and 3.5 pounds per gallon of coating (0.42 kilograms per liter) as stated in Specific Condition No. C.1. (1&2) of the current operation permit for some of their products. As a result, the facility entered into a Consent Agreement that was executed on November 4, 2013 with the RER-DERM.

4. Changes in Section III – Subsection B, C, D, & E, Emissions Unit and Specific Conditions.

a. In the current Title V operation permit No. 0250991-004-AV, Subsection B addresses Emissions Unit 004 – Coating Applications, Foam & Glass Manufacturing Operations as an unregulated emissions unit. As such, and pursuant to FDEP Title V guidelines, the information for this Emissions Unit description and rule applicability are incorporated into Appendix U – List of Unregulated Emissions Units and/or Activities and made part of this permit. Subsection B has been removed from the permit.

b. In the current Title V operation permit No. 0250991-004-AV, Subsection C & D address Emissions Units 005-006 – Metals Parts Washer & Paint Coating Processes. Subsection C addresses the VOC RACT requirements, while Subsection D addresses NESHAP subpart RRRR requirements. Since both Subsections C & D address the same emissions units, both Subsections are merged into one Subsection B in the renewal permit. Accordingly, duplicate or obsolete conditions are removed.

c. In the current Title V operation permit No. 0250991-004-AV, Subsection E addresses the common conditions for Emissions Units 003, 004, 005-006. In this renewal, this Subsection was removed. Specific Conditions E.1. (hours of operation) and E.2. (allowable fuel) have been placed appropriately under subsections A and B. Specific Condition No. E.3. (recordkeeping of fuel usage) and E.5.

(supporting documentation) have been placed under the Facility-wide conditions. At the request of the applicant, Specific Condition No. E.4. (material disposal log) was removed since this is not a rule requirement.

5. The facility has one (1) emergency diesel generator categorized as a compression ignition (CI) reciprocating internal combustion engine (RICE), and is neither subject to 40 CFR 63 subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants, 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, nor 40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. As such, and pursuant to FDEP Title V guidelines, the generator will be placed in the permit as an unregulated emissions unit 007 and added to Appendix U – List of Unregulated Emissions Units and/or Activities.
6. Other changes: Minor corrections to typographical errors, etc.
7. In the renewal application, the applicant listed the location of the Miami Lakes Plant as 5770 Miami Lakes Drive East, Miami Lakes, FL 33014. After the PROPOSED permit was issued, the RER Air Facilities Section received an e-mail from the facility's Attorney dated January 13, 2014 stating the correct address of the Miami Lakes Plant is 5572 Miami Lakes Drive East, Miami Lakes, FL 33014. Therefore, an address correction is made to the Miami Lakes Plant at issuance of the FINAL permit.

CONCLUSION

This project renews Title V air operation permit No. 0250991-004-AV, which was issued on November 14, 2008. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.