

NOTICE OF AIR POLLUTION PERMIT

May 13, 2013

CERTIFIED MAIL: 7000 0600 0025 3505 9891
RETURN RECEIPT REQUESTED

ISSUED TO:

Mr. Israel S. Carruyo
Vice President
ISCAR Ground Services Corporation
4246 SW 141 Avenue
Davie, FL 33330

Permit Number: 0251348-002-AO
Issue Date: May 13, 2013
Expiration Date: May 12, 2018

Project: State of Florida Initial Non-Title V Source Air Operation Permit for the ISCAR Ground Services Corporation facility.

Facility Description: Facility Manufactures Equipment for Use in Airports to Tow Aircraft, Load Luggage, etc. [Standard Industrial Classification (SIC) Code No. 3537 (NAICS 333924)].

Facility Location: 1182 NW 159 Drive, Miami Gardens, FL 33169

Lat./Long: 25° 55' 14.85" N / 80° 13' 7.86" W.

UTM: Zone 17, 578.23 km East, and 2867.15 km North

This is Permit Number 0251348-002-AO to operate an air pollution source issued by the **Miami-Dade County Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management pursuant to Chapter 24, Code of Miami-Dade County and Chapter 403.087, Florida Statutes (F.S.)**. This is a State Air Operating Permit authorizing the operation of the emissions units described in this permit.

The Florida Department of Environmental Protection (FDEP) has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the FDEP recognizes the RER as the approved local air pollution control program of Miami-Dade County. Through a Specific Operating Agreement, the FDEP delegated to the RER the authority to issue or deny permits for this type of air pollution source located in Miami-Dade County.

STATEMENT OF BASIS:

This permit is issued under the provisions of **Chapter 24, Code of Miami-Dade County, Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297**, and in conformance with all existing regulations of the FDEP and the RER rules. 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 RER and made a part hereof and specifically described in this permit.

PERMIT CONTENTS:

- Part I -- Summary Information
- Part II -- Facility-Wide Specific Conditions
- Part III -- Emissions Unit Specific Conditions
- Appendix A – General Conditions

PART I -- SUMMARY INFORMATION

OPERATE: This permit addresses the following air pollution emissions unit(s):

Emission Unit Number	Emission Unit Description
001	Aircraft Ground Support Equipment Manufacturing Facility consisting of the following: <ul style="list-style-type: none">• One (1) Cross Flow Paint Spray Booth• Three (3) Welding Machines• One (1) Plasma Cutting Machine• One (1) Portable Plasma Cutting Machine

SIGNIFICANT DATES:

April 19, 2013: Received Air Operation Permit Application.

REGULATORY CLASSIFICATION

This facility is classified as a natural Non-Title V minor source of air pollution.

PERMIT HISTORY:

Permit	Project	Issue Date	Expiration Date
0251348-001-AC	Initial Air Construction Permit	05/14/2012	05/13/2013
0251348-002-AO	Current Project for Initial Air Operation Permit		

PART II -- FACILITY-WIDE SPECIFIC CONDITIONS

- 1.1 Regulating Agencies: All applications, tests, reports, notifications, or other submittals required by this permit shall be submitted to the Miami-Dade County Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management located at 701 NW 1 Court, Suite 400, Miami, Florida 33136.
- 1.2 Citation Format: In this permit, references to **F.A.C. Rule 62-xxx refer to rules promulgated under Title 62 of the Florida Administrative Code; references (if any) to 40 CFR 60.xx (or 61.xx or 63.xx) refer to regulations codified under Part 60 (or 61 or 63) of Title 40 of the Code of Federal Regulations.**
- 1.3 Specific and General Conditions: The owner or operator shall be subject to the specific conditions of this permit and the owner or operator shall be aware of, and operate under, the attached General Conditions, attached as Appendix A of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S.
[Rule 62-4.160 F.A.C.]
- 1.4 Applicable Regulations: This facility is subject to regulation of Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any other applicable federal, state, or local permitting requirements or other regulations.
- 1.5 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous wastes in accordance with all applicable Federal, State and Local regulations.
- 1.6 Other Permits: This air pollution permit does not preclude the owner or operator from obtaining any other types of required permits, licenses or certifications from the RER or other departments or agencies.
- 1.7 Renewal of This State Permit Required: An application for renewal of this air operating permit must be submitted to the RER, Air Quality Management **at least 60 days prior** to the expiration date of this permit. To apply for renewal of an operating permit, the applicant shall submit the appropriate application form in triplicate, the appropriate application fee, all required compliance test results, and such additional information as the RER may require by law.
[Rule 62-4.030, 62-4.050, and 62-4.220 F.A.C.]
- 1.8 County Permit Renewal: A request for renewal of the Miami-Dade County annual air operating permit must be submitted annually to the RER Air Quality Management on the appropriate form, **by May 31st of each calendar year**, along with the appropriate Miami-Dade County permit fee.
[Chapter 24-18, Code of Miami-Dade County]
- 2.0 General Pollutant Emission Limiting Standards**
- 2.1 Objectionable Odor Prohibited: 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.]
- 2.2 General Visible Emissions Standard: Unless otherwise specified by permit or rule, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20 percent opacity at any time.
[Rule 62-296.320(4)(b) F.A.C.]

- 2.3 Volatile Organic Compounds/Organic Solvents Emissions:
No person shall 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 RER.
Such controls include the following:
- Tightly cover or close all VOC containers when they are not in use.
 - Tightly cover all open tanks, which contain VOC when they are not in use.
 - Maintain all pipes, valves, fittings, etc., which handle VOC in good operating condition.
 - Confine rags used with VOC to tightly closed, fireproof containers when not in use.
 - 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) F.A.C.]

- 2.4 Unconfined Emissions of 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 include the following:
- 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, 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.
 - Substitution of powdery materials with granular or pelletized materials, where possible.
- [Rule 62-296.320(4)(c) F.A.C.]

3.0 Operation Requirements

- 3.1 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.]
- 3.2 Excess Emissions: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to, and the duration of excess emissions shall be minimized but in no case exceeds two hours in any 24 hour period unless specifically authorized by the RER for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700 F.A.C.]

4.0 Compliance Testing Requirements

- 4.1 Test Notification: Unless otherwise specified in this permit, the RER, Air Quality Management shall be notified in writing of expected compliance test dates (when required) at least fifteen (15) days prior to compliance testing. The notification shall include the following information: the date, time, and location of each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner.
[Rule 62-297.310(7)(a) 9 F.A.C.]
- 4.2 Testing at Capacity: Compliance testing (when required) shall be conducted with the emission units operating at the permitted capacity (90 to 100% of the maximum permitted operation rate of the emission units). If an emission unit is not tested at permitted capacity, the emission unit shall not be operated above 110% of the test load until a new test showing compliance is conducted. Operation of the emissions unit above 110% of the test load is allowed for no more than 15 days for the purpose of conducting additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2) F.A.C.]
- 4.3 Special Compliance Tests: When the RER, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard in Rules 62-204 through 62-297 or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests that identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the RER.
[Rule 62-297.310(7)(b) F.A.C.]

5.0 Reporting and Record Keeping Requirements

- 5.1 Report Excess Emissions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the RER in accordance with Rule 62-4.130, F.A.C. (condition 5.2 below). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the RER.
[Rule 62-210.700(6) F.A.C.]
- 5.2 Report Plant Operation Problems: If the owner or operator is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the owner or operator shall immediately notify the RER. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the owner or operator from any liability for failure to comply with the FDEP and the RER rules.
[Rule 62-4.130 F.A.C.]
- 5.3 Retain Records: All records required by this permit shall be kept by the owner or operator and made available for the RER inspection for a minimum of three (3) years from the date of such records.
[Rule 62-4.160(14)(b) F.A.C.]
- 5.4 Compliance Test Reports: Compliance test reports (when required) shall be submitted to the RER Air Quality Management, as soon as practical, but no later than 45 days after the last sampling run of each test is completed.

Test reports shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the RER to determine if the test was properly conducted and the test results properly computed. Test reports, other than for an EPA Method 9 test, shall include the following information and other information as necessary to make a complete report required pursuant to F.A.C. Rule 297.310(8)(c):

- The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
- The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
- The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
- All measured and calculated data required to be determined by each applicable test procedure for each run.
- The detailed calculations for one run that relate the collected data to the calculated emission rate.
- The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.

[Rule 62-297.310(8)(a) &(b) F.A.C.]

5.5 Annual Operating Report Required: Annual Operating Report (DEP Form No. 62-210.900(5)) shall be completed each year and submitted to the Miami-Dade County, RER, Air Quality Management office or submitted electronically to the Florida Department of Environmental Protection by April 1 of the following year.

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

PART III -- EMISSIONS UNIT SPECIFIC CONDITIONS

This part of the permit addresses the following emissions unit.

Emissions Unit Number	Emissions Unit Description
001	<p>Aircraft Ground Support Equipment Manufacturing Facility consisting of the following:</p> <p>One (1) Cross Flow Paint Spray Booth – Miscellaneous metal parts and prime and topcoat applications Standard Tools and Equipment Model No. STCF-1000-30 Dimensions: 16’W x 16’2” H x 29’9” L Filters: Fifty-six (56 ea) 20” x 20” Andraee pleated filters with effective filter area of 1.56 ft²/ft²; total effective filter area of 242.7 ft² Exhaust Fan: 7.5 hp motor at 25,900 cfm @ 0.5” SP</p> <p>Three (3) Welding Machines Make/Model No.: Millermatic 252</p> <p>One (1) Plasma Cutting Machine Make/Model No.: EdgeMax 8-11-5470</p> <p>One (1) Portable Plasma Cutting Machine Make/Model No.: Miller Spectrum 875</p>

1.0 Emissions Limiting Standards and Operation Restrictions

- 1.1 Visible Emissions: The permittee shall not cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the visible emissions of which is equal to, or greater than 20% opacity.
 [Rule 62-296.320(4)(b) F.A.C.; Air Construction Permit No. 0251348-001-AC]
- 1.2 Facility Wide Volatile Organic Compounds Emissions: Facility-wide total emissions of volatile organic compounds (VOC), including hazardous air pollutants (HAP), shall not equal or exceed 100 tons in any consecutive 12-month period.
 [Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251348-001-AC]
- 1.3 Facility Wide Individual HAP Emissions: Facility-wide emissions of any individual hazardous air pollutant (HAP) shall not equal or exceed 10 tons in any consecutive 12-month period.
 [Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251348-001-AC]
- 1.4 Facility Wide HAP Emissions: Total emissions of all hazardous air pollutants (HAPs) shall not equal or exceed 25 tons in any consecutive 12 month period.
 [Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251348-001-AC]

1.5 VOC Emission Limiting Standards: This facility shall demonstrate compliance with the Reasonably Available Control Technology (RACT) standards for Surface Coating of Miscellaneous Metal Parts & Products, Rule 62-296.513 F.A.C, by complying with Conditions Nos. 1.5 B., 2.1, and 2.2 in this permit, or demonstrate that it meets the RACT exception pursuant to 62-296.500(3)(a) by complying with Conditions Nos. 1.5 A. and 2.3 in this permit.

A. The facility shall not emit VOC in excess of 15 pounds in any one day and 3 pounds in any one hour. If the facility is unable to meet the above specified exemption limits, then the facility shall forfeit said RACT VOC exception and from that day forward shall automatically be subject to the specific emissions limiting standards for Surface Coating of Miscellaneous Metal Parts & Products facilities specified in Condition 1.5 B. below.

[Rule 62-296.500(3)(a) F.A.C., 62-4.070(3) F.A.C.; Air Construction Permit No. 0251348-001-AC]

B. Reasonably Available Control Technology (RACT) standards for Surface Coating of Miscellaneous Metal Parts & Products:

1. (a) No owner or operator of a coating line for miscellaneous metal parts and products shall cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of:
 - i. 4.3 pounds per gallon of coating (0.52 kilograms per liter), excluding water, delivered to a coating applicator that applies clear coatings;
 - ii. 3.5 pounds per gallon of coating (0.42 kilograms per liter), excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 194 degrees Fahrenheit (90 degrees Celsius)
 - iii. 3.5 pounds per gallon of coating (0.42 kilograms per liter), excluding water, delivered to a coating applicator that applies extreme performance coatings; or
 - iv. 3.0 pounds per gallon of coating (0.36 kilograms per liter), excluding water, delivered to a coating applicator for all other coatings and coating application systems.
- (b) If more than one emission limitation in paragraph 1.5 B.1.(a) applies to a specific coating, then the least stringent emission limitation shall be applied.
- (c) All volatile organic compound emissions from solvent washings shall be considered in the emission limitations unless the solvent is directed into containers that prevent evaporation into the atmosphere.
2. The VOC emission limits in Condition No. 1.5 B.1. above shall be achieved by:
 - (a) The application of low solvent coating technology; or,
 - (b) Incineration, provided that 90% of the VOC which enter the incinerator are oxidized to carbon dioxide and water.
3. The provisions of Rule 62-296.513, F.A.C., apply to the application area(s), flashoff area(s), air and forced air dryer(s), and oven(s) used in the surface coating of the metal parts and products listed in paragraph 62-296.513(1)(a), F.A.C. These provisions also apply to prime coat, top coat, and single coat operations. Credit for transfer efficiency above the baseline of 60% for spray coating operations can be granted according to the following formula:

$$\frac{X = (TE) (Z) (Y)}{Y + (TE) (Z)}$$

Where:

X = allowable maximum VOC content (kg VOC/liter of coating less water)

Y = density of the VOC in the maximum VOC content coating (kg/liter)

Z = applicable emission limit (kg VOC/liter of coating solids deposited)
TE = transfer efficiency

An EPA and state approved test method for determination of transfer efficiency above the baseline is required.

[Rule 62-296.513(2) & (3) F.A.C.; Rule 62-296.513(1)(c) F.A.C.; Air Construction Permit No. 0251348-001-AC]

- 1.6 **Hours of Operation:** The referenced emissions unit(s) may operate 24 hours/day, 7 days/week for 52 weeks/year resulting in a total of 8,760 hrs/year.
[Rule 62-4.070(3) F.A.C.; 62-210.200(PTE), F.A.C.; Air Construction Permit No. 0251348-001-AC]

2.0 Compliance Monitoring and Record Keeping Requirements:

- 2.1 **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 rate 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.; Air Construction Permit No. 0251348-001-AC]

- 2.2 **Transfer Efficacy:** If the facility pursues the credit for transfer efficiency above the baseline of 60% for spray coating operations as described in Condition No. 1.5 B.3., then the facility must provide the following:

- a. Calculations showing the new allowable maximum VOC content (lb/gal);
- b. Calculations showing the density of the VOC in the maximum VOC content coating (lb/gal) and supporting documentation;
- c. The transfer efficiency of the applicator, and supporting documentation showing that the applicator meets this transfer efficiency as determined by an EPA and state approved test method;
- d. Supporting documentation that the coatings and solvents used at the facility meet the new allowable maximum VOC content.

Additionally, the facility shall use an applicator with a transfer efficiency equal to or greater than the transfer efficiency used in the calculations described in Condition No. 2.2 a. above when applying coatings to miscellaneous metal parts and products and operating under the new allowable maximum VOC content.

[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251348-001-AC]

- 2.3 VOC Emissions: The facility shall demonstrate compliance with the RACT exemption limits of 15 pounds in any one day and 3 pounds in any one hour specified in Condition No. 1.5 A. by determining and recording the daily and hourly VOC emission rates for all miscellaneous metal coating operations.
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251348-001-AC]
- 2.4 Individual and Total 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 rate 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.; Air Construction Permit No. 0251348-001-AC]
- 2.5 Record keeping and recycling: The permittee shall maintain a log of the amount of chemicals manifested to recyclers, the manufacturer, or the dump.
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No. 0251348-001-AC]

