Pall Aeropower Corporation
Pall Aeropower Corporation – Fort Myers

Facility ID No. 0710238

Lee County

DRAFT/PROPOSED
Title V Air Operation Permit Revision

Permit No. 0710238-005-AV
(Revision of Title V Air Operation Permit No. 0710238-003-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, South District

2295 Victoria Avenue, Suite 364
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Compliance Authority:

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Air Resource Management, South District

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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOUTH DISTRICT
P.O. BOX 2549
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RICK SCOTT
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LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

NOTICE OF DRAFT/PROPOSED PERMIT

PERMITTEE:
Pall Aeropower Corporation
4245 Evans Ave.
Fort Myers, Florida 33901-9311

Permit No. 0710238-005-AV
Pall Aeropower Corporation – Fort Myers
Facility ID No. 0710238
Title V Air Operation Permit Revision

The purpose of this permit is to revise the Title V air operation permit (No. 0710238-003-AV) for the above referenced facility. The Pall Aeropower Corporation facility is located in Lee County at 4245 Evans Avenue, Fort Myers, Florida. UTM Coordinates are: Zone 17, 415.44 East and 2942.22 North. Latitude is: 26/35/59 North; and, Longitude is: 81/51/28 West.

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: November 30, 2011
Renewal Application Due Date: **March 18, 2016**
Expiration Date: November 29, 2016

Jon M. Iglehart
Director of
District Management

JMI/CBE/mf

SECTION I. FACILITY INFORMATION

Subsection A. Facility Description.

This facility is a filter element manufacturing facility to serve the aerospace industry. The manufacturing process includes anodizing and metal finishing using aluminum oxide that is formed electrochemically on aluminum surfaces for corrosion control. There is also a passivation process where stainless steel parts are dipped in a 30% nitric acid solution. Powder coating is performed at the facility. Solar and electric cure ovens are also utilized. Various chemicals are used in the manufacturing process that contains VOCs and HAPs.

The permitted emission units consist of two (2) process lines, which are defined as "Bubble Point Process line" and "Resin Impregnation Process". Each process line is identified as an emission unit. The "Bubble Point Process Line" is Emission Unit (EU) No. 001 and the "Resin Impregnation Process" is Emission Unit (EU) No. 002. Each process contains a group of process or production units that have at least one (1) definable emission point.

The cumulative potential emissions (PTE) for the "Bubble Point Process Line" line, EU001 are: Product H115 at 7.0 tons/year (plus fugitive emissions up to 0.7 tons/year), Product H123 at 2.0 tons/year (fugitive emissions up to 0.2 tons/year), and Volatile Organic Compounds (VOC) at 151 tons/year (fugitive emissions up to 15 tons/year).

The cumulative potential emissions (PTE) for the "Resin Impregnation Process", EU002 are: Product H115 at 1.0 ton/year (fugitive emissions up to 0.1 ton/year), and Volatile Organic Compounds (VOC) at 39 tons/year (fugitive emissions up to 4 tons/year).

The maximum process throughput rate for the "Bubble Point Process Line" is 160 tons per year and the maximum process throughput rate for the "Resin Impregnation Process" is 40 tons per year.

The maximum allowed combined potential to emit (PTE) of VOCs for the facility is limited to not exceed 200 tons/year. This facility is considered a Major Source of Pollutants Other than HAPs, and is defined as a Title V facility.

NOTE: Aerospace NESHAP is NOT applicable because the facility is considered a Major Source of only VOC emissions which is greater than 100 tons per year. (The HAP emissions are below the threshold of 10 tons of a single HAP or 25 tons of combination of HAPs).

This facility is subject to applicable federal provisions regarding air quality as established by the EPA and included in sections of Title 40 in the Code of Federal Regulations (CFR). This facility is considered a Major Source of Pollutants Other than HAPs, and is defined as a **Title V facility**.

This is a minor revision to the existing Title V Operating Permit (0710238-003-AV) to eliminate the electric oven in the "Bubble Point Process Line" and replace it with a Phoenix Solar Dryer (which uses the heat from the sun), and replace the 180 cu. ft. oven in the "Resin Impregnation Process" with a Grieve oven Model TBH-500 (133 Cu. Ft. volume) and a Grieve oven Model WRC566-800 (297 Cu. Ft. volume). ***It is noted that since there is no* change in the filter product production rate or chemicals usage rates, there is no change in the amount of emissions as the result of these equipment changes.**

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

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Bubble Point Process Line
002	Resin Impregnation Process
Unregulated Emissions Units and Activities	

003	Fugitive Emissions

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received 29 July, 2011, this facility is NOT a major source of hazardous air pollutants (HAP). The existing facility is NOT a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C.

NOTE:

Aerospace NESHAP (40 CFR Part 63, Subpart GG)

Aerospace NESHAP is **NOT** applicable because the facility is considered a Major Source of only VOC emissions which is greater than 100 tons per year. (The HAP emissions are below the threshold of 10 tons of a single HAP or 25 tons of combination of HAPs).

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. Emissions of volatile organic compounds (VOCs) from the entire facility shall NOT exceed 200 tons/year (per any 12 – consecutive month period). [Rule62-210.200 (Potential to emit). F.A.C.; as requested in construction permit Application, version 3, submitted electronically on 01/11/2006).

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4) (b)1, F.A.C.]

FW5. 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, 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 control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
e. Landscaping or planting 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)2., F.A.C.; and Construction Permit 0710238-001-AC received January 11, 2006.

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. 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.]

FW8. 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.]

FW9. 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]

FW10.Test Methods and Procedures

Compliance with the VOC emission limitations of Specific Condition No. FW3 4 (above), for Emission Units EU-001, EU-002 and EU-003, shall be by record keeping and calculated by use of material balance and emission factors. Product data, including emissions and emission factors are defined in the product Material Safety and Data Sheets (MSDS), submitted with the permit application. Using the material density and VOC/HAP content (% by weight from the MSDS sheets or other manufacturer's data), calculations of the monthly total HAP and VOC emissions for each material (pounds/month). (A log sheet shall be used to show the HAP/VOC content used in the emission calculations for each material product). (See Record Keeping, Specific Condition No. FW11, below:)

FW11. Record Keeping and Reporting Requirements

Record Keeping and Reports.

Compliance with the VOC and HAP emission limitations defined in Specific Conditions No. FW3 (above), for Emission Units EU-001, EU-002 and EU-003, shall be maintained on a monthly log. Monthly entries into the log are to include the usage of all VOC and HAP containing materials used in the processes. At a minimum, the log should contain a) the facility name and facility I.D. No. 0710238, b) Month and year of record, c) Quantity used of each VOC and HAP containing material (gallons or pounds), d) Using the material density and VOC/HAP content (% by weight from the MSDS sheets or manufacturers data), a calculation of the monthly total VOC/HAP emissions for each material product, and e) A calculation of the total VOC and total of the HAP emissions for the most recent twelve (12) month period.

All required records for this facility shall be kept for the most recent five (5) year period and made available to the Department upon request.

FW12. Record Format.

(a) The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee can keep the records offsite for the remaining 3 years.

(d) The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

[40 CFR 63.5920]

FW.13 Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in FW10 - Test Methods and Procedures. (Subsection A,) Facility-Wide Testing Requirements, (above), of this permit. [Rule 62-297.310, F.A.C.]

FW.14 Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), each EU shall be tested to demonstrate compliance with the emissions standards for POLLUTANTS. Rule 62-297.310(7), F.A.C.

FW.15 Compliance Tests Prior To Renewal. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions for EU-001 and EU-002 [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

Excess Emissions

FW.16 Excess Emissions Allowed. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.

FW.17 Excess Emissions Allowed. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized. [Rule 62-210.700(2), F.A.C.

FW.18 Excess Emissions Prohibited. 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(4), F.A.C.

FW19 Material Identification & Data Sheet Reference

The permittee has provided the following listing of applicable Material Safety Data Sheets (MSDS) associated with the permit application:

Product Name	Manufacturer Product Code
Acidbrite	50 2541000
Plating Line Colors	
Yellow Hybrid	PH93104
Sand Polyester	PPPL9275E
Hybrid Yellow (cat)	PH93205
Blue Epoxy	PE91294
White Epoxy	PE91294
Silver Vein	PPS98609
Gold	PH9856
Black	PUT3911
Komatsu Black	3100E90233.7BA1
Corvel Sand	U 1555-4 8038
Silk Screening Process:	
Multi-Graphic	U.V. (NVP Free) D40
Lacquer Thinner	GA12784
Anodize Line:	
Nitric Acid NITRICVC	
Aluminum Fiery Red ML Pdr	102263
Aluminum Green LWN Pdr	102264
Sanodye MF Violet 3D	132100
Sanodal Deep Black MLW Pdr	102257
Sanodal Blue 2LW Powder	104800
Sanodal Blue 2LW Gran	198048
Anodal SH1 FL	102710
Oakite 160 1600	
Oakite Aluminum Cleaner	3180
Oakite Deoxidizer LNC	3850
Oakite HPO	4405
Sulfuric Acid 50%	N/A
Turco 4215 NC-LT	M5573

Emissions Unit EU-001, EU-002 and EU-003

Subsection A

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

EU No.	Brief Description
001	Bubble Point Process Line (Testing of filter elements)

This Emissions Unit (EU 001) is "REVISED" to eliminate the timed air cure and 150 degree F. electric cure oven and is replaced with a Phoenix Solar Dryer (which uses the heat from the sun) and a dehumidifier. This revision does NOT change the amount of air emissions or production rates defined in original construction permit No. 0710238-001-AC dated May 23, 2006

Emissions generated from processes used for "Bubble Point" testing of filter elements. This process includes a Solar cure oven. (Max. stack exit temperature is 85 degrees F.) There is No pollution control equipment. Emissions are routed thru stack or wall vents. Maximum allowable annual rate of VOCs for this emission unit is 151 tons/year. Compliance is determined by calculated material balances and emission factors for products used, record keeping, and reporting requirements. The permittee has provided Material Safety Data Sheets (MSDS), with the permit application, for each chemical or product used in the process. These also include the product emission factors. (Multiple emission points serving a single emissions source and discharging through building roof or wall vent).

Aerospace NESHAP (40 CFR Part 63, Subpart GG) is **NOT** applicable because the facility is considered a Major Source of only VOC emissions which is greater than 100 tons per year. (The HAP emissions are below the threshold of 10 tons of a single HAP or 25 tons of combination of HAPs).

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity.
The process/production rate is NOT limited.
[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), and, Permit No. 0710238-001-AC]

A.2. Methods of Operation.
(See EU-001 description above).

A.3. Hours of Operation. This emission unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0710238-001-AC]

Emission Limitations and Standards

Emissions limitations: (Compliance by record keeping and calculated by use of material balance and emission factors). Potential to emit (PTE). (Emissions allowable per Permit No. 0710238-001-AC]

A.4. Visible Emissions - Visible emissions shall not exceed 20% Opacity. Rule 62-296.320(4)(b)1.&4.,F.A.C. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4) (b)1, F.A.C.]

A.5. H115 - Methanol emissions shall not exceed 7 tons/year.

A.6. H123 – Methyl isobutyl ketone (Hexone) emissions shall not exceed 2 tons/year.

A.7. VOC emissions (PTE) is 151 tons/year and shall not exceed 160 tons/year.

Compliance Determination

A.8. Compliance is determined by calculated material balances and emission factors for products used, record keeping and reporting requirements. Material Safety Data Sheets (MSDS) are on file (and are also available at the facility) for each product used in the process. These also include the product emission factors. See **FW10**.Test Methods and Procedures in Section II.

Subsection B

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

EU No.	Brief Description
002	Resin Impregnation Process

This Emissions Unit (EU 002) is "REVISED" to replace the existing 180 cubic feet electric cure oven with one (1) Grieve electric oven Model TBH-500 (with internal 133 cubic feet internal volume) and one (1) Grieve electric oven MODEL WRC566-800 (with internal volume of 297 cubic feet). This revision does NOT change the amount of air emissions or production rates defined in original construction permit No. 0710238-001-AC dated May 23, 2006.

The "Resin Impregnation Process" uses Ethyl Alcohol and Ethyl Acetate in the operation, and includes a timed air cure and a 330 degree F. electric cure ovens (See above). (Maximum stack exit temperature is 85 degrees F.) There is no pollution control equipment. Emissions are routed thru stack or wall vents. The facility uses some manual operations to Transport component parts from warehousing and through the various stages of cleaning, anodizing and metal finishing using aluminum oxide that is formed electrochemically on aluminum surfaces for corrosion control. There is also a passivation process where stainless steel parts are dipped in a 30% nitric acid solution. Timed cure and oven curing are used in the process. Powder coating is performed at the facility.

Aerospace NESHAP (40 CFR Part 63, Subpart GG) is **NOT** applicable because the facility is considered a Major Source of only VOC emissions which is greater than 100 tons per year. (The HAP emissions are below the threshold of 10 tons of a single HAP or 25 tons of combination of HAPs).

Essential Potential to Emit (PTE) Parameters

B.1 Permitted Capacity.
The process/production rate is NOT limited.
[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), and, Permit No. 0710238-001-AC]

B.2 Methods of Operation.
(See EU-002 description above).

B.3 Hours of Operation. This emission unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0710238-001-AC]

Emission Limitations and Standards

Emissions limitations: (Compliance by record keeping and calculated by use of material balance and emission factors). Potential to emit. (PTE). (Emissions allowable per Permit No. 0710238-001-AC]

B.4 Visible Emissions - Visible emissions shall not exceed 20% Opacity. Rule 62-296.320(4)(b)1.&4.,F.A.C. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4) (b)1, F.A.C.]

B.5 H115 - Methanol emissions shall not exceed 1.0 tons/year.

B.6 VOC - emissions (PTE) is 39 tons/year and shall not exceed 40 tons/year.

Compliance Determination

B.7 Compliance is determined by calculated material balances and emission factors for products used, record keeping and reporting requirements. Material Safety Data Sheets (MSDS) are on file (and are also available at the facility) for each product used in the process. These also include the product emission factors. See **FW10**.Test Methods and Procedures in Section II.

Subsection C

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

EU No.	Brief Description
003	Fugitive Emissions (From process EU-001 and EU- 002)

There are fugitive emissions associated with Bubble Point Process Line (EU-001) and the "Resin Impregnation Process" (EU-002). The total estimated fugitive emissions are H115 @ 1.7 tons/year, H123@ 0.2 ton/year and VOC @19 tons/year. These fugitive emissions are identified as follows:

Essential Potential to Emit (PTE) Parameters

Bubble Point Process Line (EU-001)

C.1 H115 – Methanol Fugitive Emissions are estimated at maximum 0.7 tons/year.

C.2 H123 – Methyl isobutyo ketone (Hexone) Fugitive Emissions are estimated at maximum 0.2 tons/year.

C.3 VOC - Fugitive Emissions are estimated at maximum 15 tons/year

Resin Impregnation Process (EU-002)

C.3 H115 – Methyl Fugitive Emissions are estimated at maximum1.0 ton/year
C.4 VOC – Fugitive Emissions are estimated at maximum 4.0 tons/year

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary
Appendix H, Permit History
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix TV, Title V General Conditions.
Appendix RR, Facility Reporting Requirements