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

NOTICE OF AIR POLLUTION PERMIT

ISSUED TO:

PERMITTEE:
TM Windows, LLC
Authorized Representative:
Mr. Steve Metzger, General Manager
TM Windows, LLC
1543 North Powerline Road
Pompano Beach, Florida 33069

AIRS ID NO: 0112748
DRAFT Permit Number: 0112748-001-AC
Issue Date:
Expiration Date: October 7, 2015

Facility Name: TM Windows, LLC is located at 1543 North Powerline Road, Pompano Beach, Broward County, Florida.

Project Description: Construction permit for the manufacturing of aluminum windows, doors and specialty items such as awning frames from extruded aluminum stocks. The operation will be similar to the existing Non-Title V TM Windows facility located at 601 NE 12th Avenue in Pompano Beach, FL with AIRS ID No.: 0112191.

The Standard Industry Classification (SIC) is 3479; and the North American Industry Classification Standard (NAICS) Code is 332812.
Lat/Long: 26°14'49" N / 80°09'07" **UTM:** Zone 17; 584.696 Km. E; 2903.309 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 (protection of air quality) 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 (PPD) and made a part hereof.

This permit is organized by the following sections.
1. Facility Description
2. General Conditions
3. Facility-wide Conditions
4. Emissions Unit Specific Conditions, Subsections [A]

Executed in Broward County, Florida

_____
Robert C. Wong
Environmental Licensing Manager
Pollution Prevention Division

1. FACILITY DESCRIPTION

T. M. Windows, LLC is a manufacturer of aluminum doors, windows and specialty items, such as awning frames from extruded aluminum stocks. The facility is a source of air pollution due to its operations, including Fabrication, Conversion Coating and Painting.

Fabrication Process: Includes cutting, forming, welding, painting and touching up, assembling extruded and painted aluminum stocks into windows and door frames, installing glass or aluminum panels into the frames, storage and shipping. The major raw materials include preprinted and unpainted aluminum extrusion, glass, paints and coatings, solvents, and adhesives. Cutting fluids, which consists of soluble oils mixed with water, are applied to the metal and cutting tool, in order to control temperature, provide a good finish, wash away cuttings, lubricate, and inhibit surface oxidation. Following machining, metal parts are washed in a solvent-based bath, which is a cold wash degreaser of hydrocarbon solvents that contains 90% aliphatic hydrocarbons.

Conversion Coating Process: Consists of five open process tanks into which aluminum extrusions are dipped. The pieces of aluminum that have been machined are wiped by hand using rags dipped in xylene to remove cutting oils, prior to conversion coating, in which aluminum pieces are secured in a metal basket and dipped into each tank using overhead hoist.

Painting Operation: The surface coating operation takes place in two side-by-side paint spray booths, each with an exhaust stack. One spray booth is for painting new windows and doors and the second booth is for resurfacing, refinishing and touch-up. A heated dip tank, with an immersion burner rated at 1.75 MMBTU/HR, is used to prepare the extrusion materials for painting. The painted aluminum windows and doors are dried in a 2.4 MMBTU/HR natural gas-fired oven. The drying equipment is part of the surface coating operation. There is also an air handling system in the exhaust associated with this operation. Painted aluminum stocks may be received from the extrusion manufacturer, or painted on site. The paints and coatings are thinned with methyl isobutyl ketone and xylene. Xylene is pumped through lines for cleaning prior to color change.

The following figure below shows the general process flow diagram for the facility:

The facility consists of the following emissions units:

E.U. ID No.	Brief Description
001	One paint spray booth with an exhaust stack, One 2.4 MMBTU/HR natural gas-fired drying oven and One 1.75 MMBTU/HR heated dip tank.
002	One paint spray booth with an exhaust stack.

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 PPD 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 PPD.
[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 PPD.
[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 PPD 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 PPD 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 PPD 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 PPD 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 PPD immediately by phone at 954-519-1499 or by Email at PPDHOTLINE@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 PPD, may be used by the PPD as evidence in any enforcement proceeding arising under the Florida Statues 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 PPD 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 PPD.
    [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 PPD.

(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 PPD 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 PPD, 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. and Broward County Code, Sec. 27-175(e)]

18. VOC or Organic Solvents Emissions. The owner or operator 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 PPD. Displaced vapors generated during the loading of gasoline and denatured ethanol products shall be vented to a vapor control system.
[Rule 62-296.320(1), F.A.C.]

19. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the outdoor atmosphere any air pollutants from sources opacity of which is equal or greater than 20 percent. 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. CHECK FOR OVEN EXHAUST?
[Rule 62-296.320(1), 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.
[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.
[Broward County Code, Sec. 27-175(a)]

23. Special Compliance Tests. When PPD, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a PPD rule 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 which 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 PPD.
[Rule 62-297.310(7) (b), F.A.C.]

24. Operating Permit. Sixty days before the expiration date of this construction permit, the permittee shall apply for a renewal of permit using the forms incorporated by reference in the specific rule chapter for this type of permit.
[Rule 62-4.090 F.A.C.]
{Permitting Note: The permittee may also elect to submit the application electronically using the Electronic Permit Submittal and Processing system (EPSAP) via the http://www.dep.state.fl.us/air/emission/epsap/default.htm website, along with the processing fee established in Rule 62-4.050(4), F.A.C. , [62-4.090(1) and 62-4.050(4), F.A.C.]

25. Annual Operation Report (AOR). The AOR shall be submitted to the PPD 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 PPD.
[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.	Brief Description
001	One paint spray booth, with an exhaust stack, One 2.4 MMBTU/HR natural gas-fired drying oven and One 1.75 MMBTU/HR heated dip tank.
002	One paint spray booth, with an exhaust stack.

Emission Limitations and Standards

A.1. 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 3.5 pounds per

gallon of coating (0.42 kilograms per liter), excluding water delivered to a coating applicator that applies extreme performance coatings.
[F.A.C. Rule 62-296.513(2) (a) 3]. This condition applies to EU #001.

A.2. The permittee shall not use more than 875 gallons of high VOC content coatings specified below (including any high VOC content coating applied with brushes) in any consecutive twelve-month period. **These high VOC content coatings shall only be used for refinishing or touch-up and not for coating new products.** Minor touch-up of sub components of new products with high VOC content coatings to complete an assembly is acceptable. Substitute coatings may be used for refinishing provided the VOC content is not greater that those specified on the following table:

Name of Coating	VOC Content (lb/gal)
DURANAR - UC56605 *	5.47
ACRYLANAR - U58220*	5.46
DURANAR - UC66601 *	4.32
DURANAR – ADS *	6.24
DURANAR - UC43350 *	5.47
CLEAR DURANAR - UC51132 *	5.68
DURANAR- GREEN - UC70356 *	5.63

***This coating or similar**

[F.A.C. Rule 62-4.070(3), construction application amendment received June 21, 1996, F.A.C. Rule 62-4.070(3)]. This condition applies to EU#002.

A.3. The fuel used at the drying oven shall be limited to natural gas.
[Construction application received November 4, 2014]

A.4. All volatile organic compound emissions from solvent washing shall be considered in the emission limitations, unless the solvent is directed into containers that prevent evaporation into the atmosphere.
[F.A.C. Rule 62.296.513(2) (c)]

A.5. The owner or operator shall maintain daily records of operations for the most recent two year period. The records shall be made available to the local, state, or federal air pollution agency upon request. The records shall include, but not be limited to, the following:

a. The rule number applicable to the operation for which the records are being maintained.
b. The application method and substrate type (e.g. metal)
c. The amount and type of coatings, solvent used at each point of application, including exempt compounds.
The VOC content as applied in each coatings and solvent.
d. The date for each application of coating and solvent.
e. The amount of surface coating preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each.
f. Oven temperature.

[F.A.C. Rule 62-296.500(2) (b)]. This condition applies to EU#001.

A.6. The permittee shall also keep the above-referenced records for the coatings and solvent used in EU#002 (refinishing operation). Records of the hazardous air pollutants (HAPs) content shall be maintained for EU#001 and EU#002 for review by PPD staff for a period of five (5) years.

A.7. The permittee shall notify PPD of any change in products and submit new material safety data sheets (MSDS) for approval prior to use.
[F.A.C. Rule 62-4.070(3)]