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:
Leggett & Platt dba Gribetz International
Authorized Representative:
Mr. Donald Broyles, Plant Superintendent
Gribetz International
13800 N.W. 4th Street
Sunrise, Florida 33325

AIRS ID NO: 0112168
DRAFT Permit Number: 0112168-005-AF
Issue Date: December 3, 2014
Expiration Date: December 15, 2019

Facility Name: Gribetz International

Location: 13800 N.W. 4th Street, Sunrise in Broward County, Florida.

Project Description: Renewal of the federally enforceable state operating permit (FESOP). This facility performs surface coating of miscellaneous metal parts for the production of bedding machinery. The facility is exempt from the Reasonable Available Control Technology (RACT), F.A.C. Rule 62-296.513.

The Standard Industry Classification (SIC) is 3552; and the North American Industry Classification Standard (NAICS) Code is 333249.

Lat/Long: 26°07'30" N / 80°21'00" **UTM:** Zone 17; 564.98 Km. E; 2889.52 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
2014.12.02 15:07:52 -05'00'

Robert C. Wong
Environmental Licensing Manager
POLLUTION PREVENTION DIVISION

1. FACILITY DESCRIPTION

Gribetz International facility performs surface coating of miscellaneous metal parts for the manufacture of bedding machinery. The facility is exempt from Reasonable Available Control Technology (RACT), F.A.C. Rule 62-296.513 by opting to limit the volatile organic compounds (VOC) emissions below the applicable RACT threshold.

Based upon the potential emissions of VOCs and hazardous air pollutants (HAPs), the facility is a natural minor source of air emissions.

The figure below shows the process flow of the painted parts:

The facility consists of the following emissions unit:

E.U. ID No.	Brief Description
002	One (1) spray booth room with exhaust system.

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.
[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 the General Compliance Test Requirements in Rule 62-297.310 (4), F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b), F.A.C.]

20. Unconfined emissions of particulate matter: No person shall cause, let, permit, suffer or allow emission of particulate matter from any source whatsoever, including but not limited to vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, storing or handling without taking reasonable precautions to prevent such emissions.

    Reasonable precautions include, but shall not be limited to, the following:

    a) Proper maintenance and replacement of spray booth filters.
    b) To prevent overspray, coating operations shall be conducted inside authorized and permitted spray booths.
    c) Proper maintenance of particulate matter dust bag collection systems.
    d) Use of hoods, fans, filters, and similar equipment to contain or capture particulate matter.
    e) Confining abrasive blasting where possible.

    [Rule 62-296.320(4) (c), F.A.C., Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(h)]

21. 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)]

22. 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)]

23. 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)]

24. 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.]

25. Operating Permit Renewal. Sixty days before the expiration date of this operation 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.]

26. 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.] A summary of the records required under Specific Condition #31 shall also be submitted with the AOR. The VOC emission calculations and method of calculation shall be included to verify compliance with Specific Condition #26.

{Permitting Note. Information on the EAOR submittal is available at the following website: 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
002	One (1) spray booth room with exhaust system.

Emission Limitations and Standards

A.1. Volatile organic compounds (VOC) emissions are limited to 15 pounds in any one day and not more than 3 pounds in any one hour. The individual and total hazardous air pollutants (HAP) emissions shall not exceed 10 and 25 tons in any consecutive twelve-month period, respectively.
[Rule 62-296.500(3) (a), F.A.C. and Rule 62-4.070(3), F.A.C.]

Recordkeeping and Reporting Requirements

A.2 The permittee shall maintain hourly and daily records of operation. The records shall be made available to local, state or federal air pollution agencies upon request. Records shall include the date of each application of coating, hours of operation, application method and substrate type, amount and type of coatings (including catalyst and reducer) and solvents used, actual VOC emissions in lb/hr and lb/day, VOC content of each coating and solvent used in pounds (lb) of VOC/gallon of coating, and the amount of clean-up and wash-up solvents used. Also, the permittee shall calculate and keep records of VOC and HAP emissions in tons on a twelve-month rolling period, in order to verify compliance with Specific Condition No. A.1.