

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

**NOTICE OF PERMIT**

Mr. Roy Cadogan, President  
DRC Industries, Inc.  
4100 North Powerline Road, Suite Z-1  
Pompano Beach, FL 33073

Dear Mr. Cadogan:

Enclosed is operation permit Number 0112644-003-AO to operate an air pollution source issued pursuant to Section 403.087 of the Florida Statutes, Broward County’s Specific Operating Agreement with the Florida Department of Environmental Protection, and Broward County Code Chapter 27 Article IV which adopts Florida Administrative Code (FAC) 62-4, 62-296 and 62-297.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 62-103 and 28-5.201, FAC, and must be filed (received) in the in the Office of the Broward County Attorney at 115 South Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872 within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes and Chapter 27. This permit is final and effective on the date filed with the Clerk of the PPRAQD unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, FAC. Upon timely filing of a petition or a request for an extension of time, this permit will not be effective until further Order of the PPRAQD. When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, in the Office of the Broward County Attorney at 115 South Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872 and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Broward County, Florida  
POLLUTION PREVENTION, REMEDIATION AND  
AIR QUALITY DIVISION



Daniela Banu, Air Quality Administrator

cc: District Air Program Administrator, DEP Southeast District Office

**CERTIFICATE OF SERVICE**

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 4/1/2011 to the listed persons

  
Clerk

4/1/2011  
Date



Environmental Protection and Growth Management Department  
**POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION**  
Mailing Address: 1 North University Drive, Suite 203, Plantation, Florida 33324  
954-519-1260 • FAX 954-519-1495

## NOTICE OF AIR POLLUTION PERMIT

### ISSUED TO:

#### PERMITTEE:

DRC Industries, Inc.

*Authorized Representative:*

Mr. Roy Cadogan, President

4100 North Powerline Road, Suite Z-1

Pompano Beach, FL 33073

**AIRS ID No.:** 0112644

**Permit Number:** 0112644-003-AO

**Issue Date:** April 1, 2011

**Expiration Date:** April 1, 2016

**Project:** Air operating permit for surface coating of miscellaneous metal parts for the communications industry subject to Reasonable Available Control Technology, Rule 62-296.513, Florida Administrative Code.

**Lat/Long:** 26°15'32" N / 80°08'32" W

**UTM:** Zone 17; 584.5 km East; 2904.32 km North

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 (emission limitations) 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 (PPRAQD) and made a part hereof and specifically described as follows:

**Operate:** An air pollution source consisting of the following emission unit(s):

**EU#001:** One (1) FP-20106CF20, Fast Pack Universal Paint Spray Booth

**In accordance with:** Application to Construct Air Pollution Sources received October 12, 1989; Certificate of Completion of Construction received July 3, 1990; Operating Permit Renewal Application received August 30, 1995; Federally Enforceable State Operation Permit Application received September 22, 2000, additional information received October 13, 2000, November 22, 2000, January 8, 2001 and February 14, 2001; Public Notice of Intent to Issue Permit issued February 23, 2001 and published in the Sun-Sentinel newspaper on May 16, 2001; Proof of Publication received May 22, 2001; Federally Enforceable State Operation Permit Renewal Application received September 23, 2005 and additional information received December 22, 2005; Federally Enforceable State Operation Permit Renewal Application received September 2, 2010, additional information received December 13, 2010 and January 11, 2011 (none are attached).

**Location:** 4100 North Powerline Road, Pompano Beach, FL

**To serve:** Fabricated metal covered doors, sash, framer, molding and trims (SIC 3442).

**Subject to:** Conditions 1 - 32

**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 PPRAQD 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 PPRAQD.  
[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 PPRAQD.  
[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 PPRAQD 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 PPRAQD 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 PPRAQD 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 PPRAQD 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 PPRAQD immediately by phone at 954-519-1499 or by Email at EPDHOTLINE@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 PPRAQD, may be used by the PPRAQD as evidence in any enforcement proceeding arising under the Florida Statutes 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.  
[Rules 62-4.160(10), F.A.C.]
12. Permit Transfer. This permit is transferable only upon PPRAQD 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 is approved by the PPRAQD.  
[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 PPRAQD.
  - (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 PPRAQD 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 PPRAQD, 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]

### 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. Volatile Organic Compound Emissions or Organic Solvent 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 PPRAQD.  
[Rule 62-296.320(1)(a), F.A.C. and Broward County Code, Sec. 27-175(f)]
19. 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 permitted spray booths.
  - d) Use of hoods, fans, filters, and similar equipment to contain or capture particulate matter.

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

**Specific Conditions****Emission Limiting Standards**

23. 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 (VOCs) 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.  
[Rule 62-296.513(2)(a)3, F.A.C.]
24. In order to avoid major source (Title V) applicable standards, the VOC emissions shall be less than 100 tons in any consecutive twelve-month period, the individual hazardous air pollutant (HAP) emissions shall be less than 10 tons in any consecutive twelve-month period and the total HAP emissions shall be less than 25 tons in any consecutive twelve-month period.  
[Rule 62-4.070(3), F.A.C., and Rule 62-213.420(3)(c)1, F.A.C.]
25. 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.  
[Rule 62-296.513(2)(c), F.A.C.]

**Compliance Testing Requirements**

26. The VOC compliance test method to demonstrate compliance with the emission limiting standard in Specific Condition No. 23 shall be EPA Method 24 or EPA 450/3-84-019, incorporated and adopted by reference in Rule 62-297, F.A.C.  
[Rule 62-296.513(4)(a), F.A.C. and Rule 62-297.401(24), F.A.C.]
27. The compliance test referenced in Specific Condition #26 shall be performed prior to obtaining a renewed operation permit or whenever a new type or brand of coating is used.  
[Rule 62-297.310(7)(a)3, F.A.C., and Rule 62-4.070(3), F.A.C.]

**Recordkeeping and Reporting Requirements**

28. 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:
- The rule number applicable to the operation for which the records are being maintained.
  - The application method and substrate type (e.g. metal)
  - 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.
  - The date for each application of coating and solvent.
  - The amount of surface coating preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each.
- [Rule 62-296.500(2)(b)1, F.A.C.]
29. The permittee shall calculate and maintain records of total VOC, individual HAP and total HAP emissions on a consecutive twelve-month rolling period.  
[Rule 62-4.070(3), F.A.C.]
30. On or before April 1 of each calendar year, the permittee shall submit either a completed hard copy of Florida Department of Environmental Protection Form 62-210.900(5), Annual Operating Report (AOR) for Air Pollutant Emitting Facility to Broward County, PPRAQD, or submit an electronic AOR to the Florida Department of

Environmental Protection. The VOC emission calculations and method of calculation shall be included to verify compliance with Specific Condition No. 23.

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

31. Copies of all reports, tests, notifications or other submittals required by this permit shall be submitted to PPRAQD, as soon as practical but no later than forty-five (45) days after the test is completed, specifically if a new type or brand of coating or solvent is utilized.

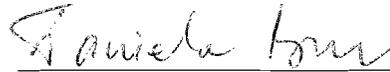
[Rule 62-297.310(8)(b), F.A.C., and Rule 62-4.070(3), F.A.C.]

32. 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/software.htm> website, along with the processing fee established in Rule 62-4.050(4), F.A.C.}

Executed in Broward County, Florida  
Pollution Prevention, Remediation and Air Quality Division



Daniela Banu, Air Quality Administrator