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 FINAL PERMIT

Mr. Gary Myers, Safety & Regulatory Director
PLZ Holding Corp.
105 Bolte Lane
St. Clair, MO 63077

VIA ELECTRONIC MAIL
RETURNED E-MAIL RECEIPT REQUESTED

Dear Mr. Myers:

Enclosed is construction permit number 0112733-001-AC to construct an air pollution source at the facility named CPC Aeroscience located at 2700 S.W. 14th Street, Pompano Beach, Florida 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, Room: 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

Daniela Banu, Air Quality Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Permit was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with e-mail receipt requested before the close of business on 2/16/2012 to the persons listed below.

Lennon Anderson, P.E., SFDEP, Air Section, Lennon.Anderson@dep.state.fl.us

Barry Westmark, P.E., ECT, Inc., bwestmark@ectinc.com

Greg Sandlin, CPC Aeroscience, gsandlin@cpcaeroscience.com

Gary Myers, PLZ Holding Corp., gmyers@cpcaeroscience.com

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) 2/16/2012 (Date)

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 AIR POLLUTION PERMIT

ISSUED TO:

PERMITTEE:
PLZ Holding Corporation
Authorized Representative:
Gary Myers, Safety & Regulatory Director
105 Bolte Lane
St. Clair, MO 63077

AIRS ID NO: 0112733
Permit Number: 0112733-001-AC
Issue Date: February 16, 2012
Expiration Date: August 17, 2012

Facility Name: CPC Aeroscience

Project Description: After-the-fact constructions permit for an aerosol can manufacturing operation SIC Code: 2842
Location: 2700 S.W. 14th Street, Pompano Beach, FL 33069.
Lat/Long: 26°12'44.8" N / 80°09'31" W

UTM: Zone 17; 584.052 Km E; 2899.509 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 (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.

In accordance with: There are no previous permits. The construction application was received on August 17, 2011, additional information received January 6, 2012, Notice of Intent to Issue Permit was issued January 23, 2012, Public Notice was published in the Sun-Sentinel newspaper on January 30, 2012 (none are attached).

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

Executed in Broward County, Florida

Daniela Banu
Air Quality Administrator
Broward County Pollution Prevention, Remediation and Air Quality Division

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 954-519-1848

NOTICE OF AIR POLLUTION PERMIT

Issued by:

TO: [illegible]
[illegible] Corporation
Attention: [illegible]
Manager, Safety & Regulatory Director
[illegible] Dixie Lane
[illegible] Clair, MO 63077

AIRS ID NO: 011273
Permit Number: 011273-001-AC
Issue Date: February 16, 2012
Expiration Date: August 17, 2012

Facility Name: CPG Processing

Project Description: Application for construction permit for an aerosol can manufacturing operation SIC Code: 3942

Location: 2700 S.W. 14th Street, Pompano Beach, FL 33069.
Latitude/Longitude: 26°14'[illegible]" N / 80°09'31" W

UTM: Zone 17: 584,052 Km E; 2809,509 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 (implementing ordinances) and in compliance 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.

In accordance with: There are no previous permits. The construction application was received on August 17, 2011. Additional information received January 6, 2012. Notice of Intent to Issue Permit was issued January 23, 2012. Public Notice was published in the Sun-Sentinel newspaper on January 30, 2012 (copy are attached).

This permit is organized by the following sections:
1. Facility Description
2. General Conditions
3. Facility-wide Conditions
4. Emissions Unit Specific Conditions

Executed in Broward County, Florida

Daniela Bern
Air Quality Administrator
Broward County Pollution Prevention, Remediation and Air Quality Division

1. FACILITY DESCRIPTION

The facility manufactures aerosol cans using a 2-stage process. First, a liquid concentrate is blended in chemical mixing tanks. The mixing tanks (EP6, mixing department) consist of fifteen (15) tanks ranging in size from 165 gallons to 1,900 gallons with the majority of the tanks being approximately 500 gallons. Nine (9) tanks are in the range of 418 gallons to 550 gallons with the average being 720 gallons. Solids (powders, pellets, crystalline) and small quantities of liquid raw materials are introduced into the mixing tank through the top (open lid). The blending or mixing rooms have four (4) exhaust vents. Large quantity liquid ingredients are pumped into the tank through the bottom from raw materials bulk tanks (EP1-EP5) with the lids closed. Lower volatility components are added first to dissolve or suspend any solid ingredients and higher volatility ingredients are added last to minimize dwell time. All mixing is done with the lids closed (EP6). Once the liquid concentrate is finished and has been approved by the Quality Assurance Department, it is filled into empty aerosol cans and aerosol valves are then inserted into the top of the cans. There are two fill lines one is a hydrocarbon line; and the other one is a carbon dioxide line. On the primary fill line, the liquefied petroleum gas (LPG) is injected under the mounting cup of the aerosol valve and the mounting cup is then crimped in place. On the secondary fill line, the valve is crimped in place immediately after the liquid concentrate is filled and the propellant, either carbon dioxide 1, 1, 1, 2-tetrafluorethane (HFC-134A) is injected through the valve to pressurize the can. Once the aerosol valves are crimped in place (EP7), the containers are sealed and no emissions occur until the can is intentionally actuated by the end-user.

Once the batch has been packaged, the mixing tanks are washed with a heated water (EP9, 1.35 MMBTU/natural gas-fired steam boiler used for hot water) "bath" The "wash" is collected in closed-head drums and stored until it is re-used in the next batch of that particular formula. The boiler is a Fulton Model FB030-A with a maximum annual natural gas rate of 11.66 MMCF; and it is enclosed in a room exhausting to the outside through a stack.

There is a digital UV coater printing operation in a separate room for printing the labels (EP8 in the Process Flow Diagram). There is an exhaust system in the printing room but there is not an exhaust stack. There is not a dryer. The inks used are paste type inks that are mixed with hydrocarbon based oil prior to putting on the press. The air emissions from this operation are fugitive in nature.

There is also a groundwater remediation system which is operated by CPC Aeroscience; and it is not part of the operation. It has a county air license to operate Since September 1, 2010. The volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions are below 1 tons/year.

Primary emissions are fugitive in nature and they originate primarily from the liquid blending and packaging processes. Further emissions originate from the propellant introduction as the can is released from the pressurizing equipment (gasser), from the equipment clean up, and from the digital printing operation (EP8) that it is used to produce the product labels.

Also, there is one 55 gallons drum, at any given time, which contains additional additives. These additives are also added into the mixture. The majority of these additives are fragrances and dyes.

The emissions calculations were performed using the EPA Tank program for the batching and bulk chemicals storage tanks and AP-42 Emissions Factors for the steam boiler and emissions factors based upon manufacturer's information for the gas losses from filling cans. The total facility-wide volatile organic compounds (VOC) are 2.05 tons/yr., single hazardous air pollutants (HAP) emissions are 0.2528 tons/yr. and total HAP emissions are 0.2540 tons/yr. Based upon the potential emissions this facility is considered a natural minor source of air pollution at this time. The facility will be required to keep records of the emitted pollutants on a twelve consecutive month basis to demonstrate natural minor source status at all times.

1. ACTIVITY DESCRIPTION

The facility manufactures aerosol cans using a 2-stage process. First, a liquid concentrate is blended in bench mixing tanks. The mixing tanks (LPC, mixing department) consist of fifteen (15) tanks ranging in size from 55 gallons to 1,000 gallons with the majority of the tanks being approximately 300 gallons. Most of the tanks are in the range of 418 gallons to 550 gallons with the average being 720 gallons. Solids (powders, pellets, crystalline) and small quantities of liquid raw materials are introduced into the mixing tank through the top (open lid). The blending or mixing rooms have four (4) exhaust vents. Large quantity liquid materials are pumped into the tank through the bottom from raw materials bulk tanks (FP1-FP5) with the lids closed. Lower volatility components are added first to dissolve or suspend any solid ingredients and higher volatility ingredients are added last to minimize dwell time. All mixing is done with the lids closed (HPC). Once the liquid concentrate is finished and has been approved by the Quality Assurance Department, it is filled into empty aerosol cans and aerosol valves are then inserted into the top of the cans. There are two fill lines one is a hydrocarbon line and the other one is a carbon dioxide line. On the primary fill line, the liquefied petroleum gas (LPG) is injected under the mounting cup of the aerosol valve and the mounting cup is then crimped in place. On the secondary fill line, the valve is crimped in place immediately after the liquid concentrate is filled and the propellant, either carbon dioxide, 1, 1, 1, 2-tetrafluoroethane (HFC-134A) is injected through the valve to pressurize the can. Once the aerosol valves are crimped in place (HPC), the containers are sealed and no emissions occur until the can is intentionally actuated by the end-user.

Once the batch has been packaged, the mixing tanks are washed with a heated water (HPC). 1.35 MMBtu/hr (HPC) natural gas-fired steam boiler used for hot water) "bath". The "wash" is collected in closed-head drums and stored until it is re-used in the next batch of that particular formula. The boiler is a Fulton Model 1 (FOC). It is a maximum steam natural gas rate of 11.66 MMCF/year and it is enclosed in a room exhausting to the outside through a stack.

There is a digital UV product printing operation in a separate room for printing the labels (LPS in the Process Flow Diagram). There is an exhaust system in the printing room but there is not an exhaust stack. There is also a dryer. The inks used are basic type inks that are mixed with hydrocarbon based oil prior to putting on the press. The air emissions from this operation are fugitive in nature.

There is also a pressurized air purification system which is operated by CPC Aerosolution and it is not part of the operation. It has a security air license to operate since September 1, 2010. The volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions are below 1 ton/year.

Primary emissions are fugitive in nature and they originate primarily from the liquid blending and packaging processes. Further emissions originate from the propellant introduction as it is can is released from the pressurizing equipment (gassed), from the equipment clean up, and from the digital printing operation (LPS) that is used to produce the product labels.

Also, there is one 55 gallons drum, at any given time, which contains additional additives. These additives are also added into the mixture. The majority of these additives are fragrances and dyes.

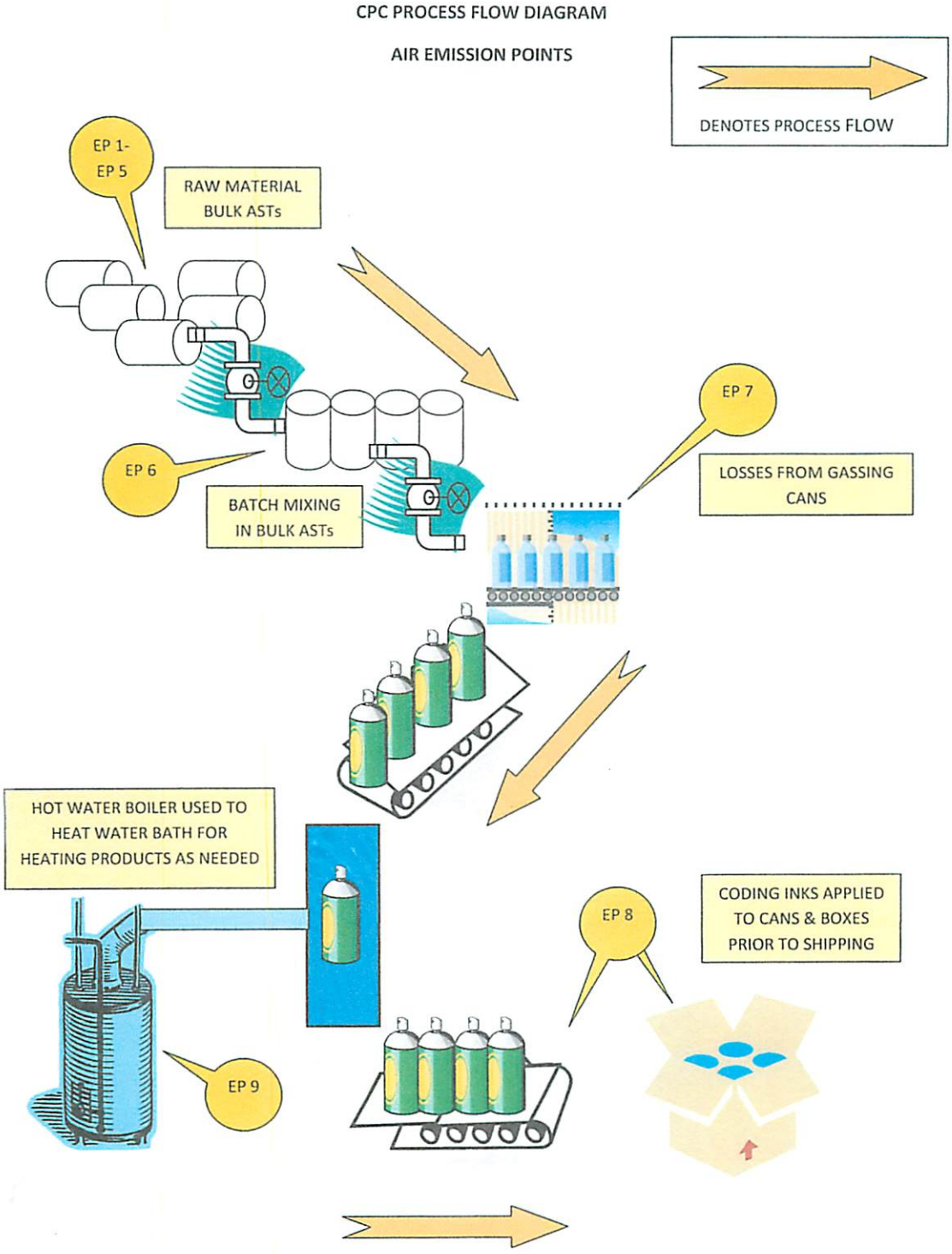
The emissions calculations were performed using the BPA Tank program for the blending and bulk chemicals storage tanks and AP-42 Emissions Factors for the steam boiler and emissions factors based upon manufacturer's information for the gas lighter from filling cans. The total facility-wide volatile organic compounds (VOC) are 2.05 tons/yr, single hazardous air pollutants (HAP) emissions are 0.2528 tons/yr and total HAP emissions are 0.3240 tons/yr. Based upon the potential emissions this facility is considered a natural minor source of air pollution at this time. The facility will be required to keep records of the emitted pollutants on a rolling consecutive month basis to demonstrate natural minor source status at all times.

The facility consists of the following emissions units:

E.U. ID No.	Brief Description
001	Aerosol can manufacturing operation consisting of five (5) raw materials bulk above ground storage tanks (ASTS) with two (2) 3,900 gallons each and one (1) 2,000 gallons, one (1) 4,000 gallons and one (1) 8,000 gallons, batch mixing ASTS with fifteen (15) tanks ranging from 165 gallons to 1,900 gallons in size with the average being 720 gallons, losses from filling (gassing) cans and can and box coding inks. There are 5,400 gallons AST, 7,500 gallons AST and 3,900 gallons AST which are not in use. There is a UV coater digital printing operation that uses paste type inks mixed with a hydrocarbon based oil. There are four (4) process exhaust vents in the mixing room and raw material bulk tanks room.
002	One Fulton Model Number: FB030-A natural gas-fired steam boiler with a maximum fire rate of 1.35 MMBtu/hr. There is an exhaust stack. The heated water is used to wash the mixing tanks.

There is also a groundwater remediation system which is operated by CPC Aeroscience; and it is not part of the aerosol cans manufacturing operation. It is considered an unregulated and insignificant emissions unit since it emits no emissions-limited pollutants, and it is not subject to a unit-specific work practice standard. It has a county air license to operate since September 1, 2010. It is also regulated under the PPRAQD's contaminated site program.

Next page depicts the process flow diagram which shows the air emission points.


CPC PROCESS FLOW DIAGRAM
AIR EMISSION POINTS
DENOTES PROCESS FLOW
EP 1-
EP 5
RAW MATERIAL
BULK ASTs
EP 6
BATCH MIXING
IN BULK ASTs
EP 7
LOSSES FROM GASSING
CANS
HOT WATER BOILER USED TO
HEAT WATER BATH FOR
HEATING PRODUCTS AS NEEDED
EP 9
EP 8
CODING INKS APPLIED
TO CANS & BOXES
PRIOR TO SHIPPING

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 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 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 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 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.

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 62-4.130 (8), F.A.C.]

9. Reporting Requirements. The Permittee shall report any periods of noncompliance to the PPRAQD immediately by phone, at 904-488-1344 or by email at EPDHOTLINE@dep.state.fl.us. 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 Preservation. By accepting this permit, the Permittee understands and agrees that all recorded 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 (8), 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 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 approved by the PPRAQD.

[Rule 62-4.120 (1), 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]

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.]

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

19. General Visible Emissions. No person shall cause, let, permit, suffer or allow being discharged into the atmosphere any air pollutants from sources, the opacity of which is equal to or greater than 20 percent. If the presence of uncombined water is the only reason for failure to meet visible emission standards given in this section, such failure shall not be a violation of this prohibition.
[Rule 62-296.320(4) (b), F.A.C. and Broward County Code, Section 27-175(i)] This rule also applies to EU#002.

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.

23. Special Compliance Tests. When PPRAQD, 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 PPRAQD rule or in a permit issued pursuant to those rules is being violated, it may 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 PPRAQD.
[Rule 62-297.310(7) (b), F.A.C.]

1. The person responsible for performing the analysis;
2. The analytical technique or methods used;
3. The results of such analysis.
[Rule 62-4.160 (14), F.A.C.]

17. Administrative Penalties. 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.]

18. Rules Adopted. 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. 27-172.
[Broward County Code Sec. 27-172]

GENERAL CONDITIONS

19. Objectionable Odors. 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.]

20. 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 approved by the PPRAQD.
[Rule 62-296.320(4), F.A.C. Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(f)]

21. General Visible Emissions. No person shall cause, let, permit, suffer or allow being discharged into the atmosphere any air pollutants from sources, the opacity of which is equal to or greater than 20 percent. If the presence of uncombined water is the only reason for failure to meet visible emission standards given in this section, such failure shall not be a violation of this prohibition.
[Rule 62-296.320(4)(b), F.A.C. and Broward County Code, Section 27-175(j)] This rule also applies to [illegible].

22. Odor Prohibited. No person shall build, erect, install, or use any article, machine, equipment or other contrivance if it is apparent that such will cause any emission which would otherwise constitute a violation of any section of Broward County Code.
[Rule 62-4.070(4), F.A.C. and Broward County Code, Sec. 27-175(b)]

23. 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 (6), F.A.C. and Broward County Code, Sec. 27-175(c)]

24. Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Codes.

25. Special Compliance Tests. When PPRAQD, 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 PPRAQD rule or in a permit issued pursuant to those rules is being violated, it may 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 PPRAQD.
[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 an operation 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.]

Permitting Note:

This facility may be subject to 40 CFR 59 – Subpart E - National Volatile Organic Compound Standards for Aerosol Coatings; which has not been adopted by Florida DEP, and which is only federally enforceable at this time. The link to the rule is **http://www.gpo.gov/fdsys/pkg/CFR-2009-title40-vol5/pdf/CFR-2009-title40-vol5-part59-subpartE.pdf** . This facility manufactures aerosol coatings after July 1, 2009 and this product is for sale and distribution in the United States.

This facility, specifically EU#002 – Natural gas-fired steam boiler is not subject to the NSPS, 40 CFR 60 – Subpart Dc, Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units because the design heat input capacity is less than 10 MMBtu/hr. Also, it is not subject to 40 CFR 63, Subpart DDDDD – Boiler MACT, Industrial, Commercial, Institutional Boilers and Process Heaters because the operation is a natural minor source of hazardous air pollutants (HAP) at the present time; and it is a small (less than 10 MMBTU/hr.) steam boiler that produces hot water to clean the mixing tanks only. The boiler is not considered a process heater.

EU#002 – Natural gas-fired steam boiler is also exempted from F.A.C. 210.300(a)33, 34e because the unit's maximum annual fuel usage is 11.6641 million standard cubic feet, which is less than 150 million standard cubic feet of natural gas; the standard set by the rule. It is not subject to the Acid Rain Program. Also, it is not subject to F.A.C. 62-296.406 – Small boilers with a heat input capacity less than 250 MMBTU/hr., because the boiler is exempt pursuant to F.A.C. 62-210.300.

4. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Description of Emissions Unit
001	Aerosol can manufacturing operation consisting of five (5) raw materials bulk above ground storage tanks (ASTS) with two (2) 3,900 gallons each and one (1) 2,000 gallons, one (1) 4,000 gallons and one 91) 8,000 gallons, batch mixing ASTS with fifteen (15) tanks ranging from 165 gallons to 1,900 gallons in size with the average being 720 gallons, losses from filling (gassing) cans and can and box coding inks. There are 5,400 gallons AST, 7,500 gallons AST and 3,900 gallons AST which are not in use. There is a UV coater digital printing operation that uses paste type inks mixed with a hydrocarbon based oil. There are four (4) process exhaust vents in the mixing room and raw material bulk tanks room.

Recordkeeping Requirements

25. In order to maintain natural minor source status, permittee shall maintain records at the facility for a period of five (5) years from the date the records were created and be made available for PPRAQD staff review, if necessary, of the following:

    a. The amount of materials used in any consecutive twelve-month basis.
    b. Also, the permittee shall calculate VOC and HAP emissions at the facility on a consecutive twelve-month basis.
    [Rule 62-4.070(3), F.A.C.]

Subsection B. This section addresses the following emissions unit.

E.U. ID No.	Description of Emissions Unit
002	One Fulton Model Number: FB030-A natural gas-fired steam boiler with a maximum fire rate of 1.35 MMBtu/hr. There is an exhaust stack. The heated water is used to wash the mixing tanks.

This emissions unit is considered an unregulated emissions unit. It emits no "emissions-limited pollutant" and subject to no unit-specific work practice standard, though it is subject to regulations applied on a facility-wide basis, such as Rule 62-296.320(4) (b), F.A.C- General Visible Emissions.

Recordkeeping and Reporting Requirements

26. In order to maintain natural minor source status, the permittee shall keep records and calculate and demonstrate PM/PM10, SOx, NOx, CO and VOC emissions for the boiler and from the fuel burned, on a consecutive twelve- month basis.
    [Rule 62-4.070(3), F.A.C.]

27. Compliance Test Report Submittal. If a compliance test is required, the compliance test report shall be submitted to the PPRAQD as soon as practicable, but no later than 45 days after the last test is completed.
    [Rule 62-297.310(8) (a) & (b), F.A.C.]