Eastern Aero Marine, Inc.
Facility ID No. 0250814
Miami-Dade County

Title V Air Operation Permit Renewal

Permit No. 0250814-007-AV
(Renewal of Title V Air Operation Permit No. 0250814-005-AV)

Permitting & Compliance Authority:
Miami-Dade County
Department of Regulatory and Economic Resources
Division of Environmental Resources Management
Air Quality Management
701 N.W. 1st Court
Second Floor
Miami, Florida 33136

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PROPOSED PERMIT

PERMITTEE:
Eastern Aero Marine, Inc.
5502 NW 37 Avenue
Miami, FL 33142

Permit No. 0250814-007-AV
Eastern Aero Marine
Facility Id. No. 0250814
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit No. 0250814-005-AV for the above referenced facility. The Eastern Aero Marine, Inc. facility is located in Miami-Dade County at 5502 NW 37 Avenue, Miami, Florida. UTM Coordinates are: Zone 17, 572.66 km East and 2856.28 km North; Latitude: 25^0 49' 28" North and Longitude: 80^0 16' 4" West

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: PROPOSED
Renewal Application Due Date: PROPOSED
Expiration Date: PROPOSED

(Proposed)

_____

H. Patrick Wong, Chief
Air Quality Management
Regulatory & Economic Resources
Miami-Dade County

HPW/tr

SECTION I. FACILITY INFORMATION

Subsection A. Facility Description.

The Eastern Aero Marine (EAM), Inc. facility manufactures survival equipment consisting of inflatable vests and rafts for the aviation and marine industries. The EAM facility cuts neoprene rubber-coated nylon fabric material into pieces, cleans the bonding surfaces with solvent, applies adhesive, and aligns and bonds the pieces together during the assembly of personal flotation devices and inflatable rafts. All vests are sealed using radio frequency (RF), and RF heat sealing equipment using between 6 and 40 KV of electrical energy. Inks containing toluene, glycol ether and naphthalene are used in the silk screening operation which is used to print information and instructions on the vest. In addition to the manufacturing, the facility is also a Federal Aviation Administration (FAA) approved repair station, capable of overhauling life rafts, life vests, survival and first aid kits, and evacuation slides. Painting of metal cylinder bottles is conducted in one (1) paint spray booth. Since the painting process is classified as refinishing, and not manufacturing, it is exempt from Rule 62-296.513, F.A.C., the Reasonably Available Control Technology (RACT) Rule on Surface Coating of Miscellaneous Metals Parts and Products. Volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) are emitted from lacquers, thinners, solvents, inks, primers, paints, and adhesives used in the survival equipment manufacturing. The facility has been in operation since prior to 1997.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Inflatable Vest and Raft Manufacturing Operations for the Aviation and Marine Industries.
002	One (1) Floor-Type Paint Spray Booth

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received May 12, 2014, this facility is a major source of hazardous air pollutants (HAP). The existing facility is not a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
State Rule Citations – 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297	001 - 002
Local Rule – Chapter 24 – Code of Miami-Dade County	001 - 002

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rule 62-296.320(2) and 62-210.200 (Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1), F.A.C.]
{Permitting Note: Nothing is deemed necessary and ordered at this time.}

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

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.
b. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
c. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
d. Landscaping or planting of vegetation.
e. Confining abrasive blasting where possible.
f. Enclosure or covering of conveyor systems.

[Rule 62-296.320(4)(c), F.A.C.]

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees: The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each

year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

FW7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:
a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

FW9. The permittee shall submit all compliance related notifications and reports required of this permit to the Regulatory and Economic Resources (RER) at the following address:

Miami-Dade County
Regulatory and Economic Resources
Air Quality Management
701 NW 1 Court, Suite 400
Miami, Florida 33136-3912

Subsection A: Emissions Units 001 & 002

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

EU No.	Brief Description
001	**Inflatable Vest and Raft Manufacturing Operations for the Aviation and Marine Industries** **Vest manufacturing process** Fabric is received from the vendor, and cut into panels for assembly. The panels are then sent to silk screening to print instructions. Screen ink retarder is mixed with IL 111 used as a thinner, and the silk screens are cleaned after use with a mixture of xylene (HAP) and butyl cellusolve (Non-HAP chemical). The panels go to radio frequency (RF) heat sealing for welding on manifolds and oral tubes and then RF heat sealed together to form a vest inflation cell. The vest harness is attached to the cell and the vest is leak tested. The vest goes to the final assembly for installation of the vest lights and inflation system. The vest is inspected, folded and placed into stowage bag. **Raft manufacturing process** Fabric is received from the vendor, and cut into panels for assembly. The panels are then coated with cement. Shore adhesive is used for aviation and black adhesive is used for marine drafts. The panels are assembled into tubes cemented. Toluene is used to activate pre-surfaces. Tubes are inspected by Quality Assurance. Floor and accessories are placed on tubes. Shore adhesive or black adhesive, cement and toluene are used. The rafts are cleaned and inspected. Toluene is used as cleaner. The Rafts are packed for shipment.
002	**One (1) Floor-Type Paint Spray Booth** Manufacturer: Binks Model No: FA87TB Dimensions: 8’ W x 7’ 6” H x 8’ 8” D Fan: One (1) 24” diameter, 1.5 HP motor rated at 7,600 acfm, 1,641 rpm, and face velocity of 138 ft/minute Filter: Two (2) dry arrestor exhaust filters: 8’ X 3’ each One (1) 2 foot exit diameter exhaust stack. Stack height 7’ 6” ft from bottom; 13’ – 9” from roof, Type V* * Type V – A stack with unobstructed opening discharging in a vertical or nearly vertical direction

Essential Potential to Emit (PTE) Parameters

A.1. Visible Emissions: The permittee shall not cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the opacity of which is equal to or greater than 20%.
[Rule 62-296.320(4)(b) F.A.C., Permit No. 0250814-006-AC]

A.2. Hours of Operation: The referenced emission unit(s) may operate 24 hours/day, 7 days/week for 52 weeks/year resulting in a total of 8760 hours/year.
[Rule 62-4.160(2) and 62-210.200 (PTE) F.A.C., Permit No. 0250814-006-AC]

A.3. Excess Emissions Allowed: Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

A.4. Excess Emissions Allowed: Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C.]

A.5. Excess Emissions Prohibited: Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Compliance Monitoring and Recordkeeping Requirements

A.6. VOC Content and Emissions: The permittee shall determine the VOC content of all materials, including solvents, and shall monitor the usage of such materials at the referenced emissions unit(s), by recording and maintaining the following information:

a. The VOC content for each material containing or emitting VOCs.
b. The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emissions unit(s).
c. The total monthly VOC emissions rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month.
d. A rolling consecutive 12-month total emissions rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.

[Rule 62-4.070(3) F.A.C., Permit No. 0250814-006-AC]

A.7. HAP Content and Emissions: The permittee shall determine the total and individual HAP contents of all materials, including solvents, and shall monitor the usage of such materials at the referenced emissions unit(s), by recording and maintaining the following information:

a. The individual and total HAP contents for each material containing or emitting HAPs.
b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emissions unit(s).
c. The individual and total monthly HAP emissions rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.
d. A rolling consecutive 12-month total emissions rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months.

[Rule 62-4.070(3) F.A.C., Permit No. 0250814-006-AC]

A.8. Record of Recycling: A log shall be kept to document the amount of chemicals manifested to recyclers, the manufacturer, or the dump.
[Rule 62-4.070(3) F.A.C., Permit No. 0250814-006-AC]

A.9. Supporting Documentation: Supporting documentation, such as Material Safety Data Sheets (MSDS), purchase orders, etc., shall be kept, which includes sufficient information, to determine compliance. The log and documents shall be kept for at least 5 years and made available to the RER. Monthly logs shall be completed within 10 calendar days after completion of the preceding month.
[Rules 64-4.070(3) and 62-213.440(1)(b)2b, F.A.C., and Permit No. 0250814-006-AC]

SECTION IV. APPENDICES

The Following Appendices are Enforceable Parts of this Permit:

Appendix A, Glossary.
Appendix TV, Title V General Conditions.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-Wide Reporting Requirements.
Appendix TR, Facility-Wide Testing Requirements.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History
Statement of Basis