August 15, 2011

CERTFIED MAIL: 7008 1830 0002 8174 9897
RETURN RECEIPT REQUESTED

PERMITTEE

Taurus International Manufacturing, Inc.
16175 NW 49 Avenue
Miami, FL 33014

Authorized Representative:
Mr. David J. Blenker, Executive VP

Air Permit No. 0251334-001-AC
Permit Expires: August 14, 2012

Taurus International Manufacturing, Inc.
Minor Source Air Construction Permit
Firearm Manufacturing Operations

This is the final air construction permit No. 0251334-001-AC, for an initial State Air Construction Permit for existing but previously unpermitted emissions units, and authorization to complete a bi-fuel retrofit on both diesel generators at the facility. Operations include metal injection molding, debinding, sintering, and test firing. The proposed work will be conducted at the Taurus International Manufacturing, Inc. facility which manufactures small firearms (Standard Industrial Classification No. 3484). The facility is located in Miami-Dade County at 16175 NW 49 Avenue, Miami, Florida 33014. The UTM coordinates are Zone 17, 572.08 km East, and 2867.1 km North.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of the final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) 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 must be filed within 30 days after this order is filed with the clerk of the Miami-Dade County Department of Environmental Resources Management (DERM), Air Quality Management Division.

Executed in Miami-Dade County, Florida

_____ _____

H. Patrick Wong, Chief (Date)
Air Quality Management Division

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by Certified U.S. mail and/or electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

David J. Blenker, Executive VP, Taurus International Manufacturing, Inc. [dblenker@taurususa.com]

D. Martin Liebold, P.E., PowerSecure, Inc. 1609 Heritage Commerce Court, Wake Forest, NC 27587 [mliebold@powersecure.com]

Mark Huncik, PowerSecure, Inc. 1609 Heritage Commerce Court, Wake Forest, NC 27587 [mhuncik@cs.com]

Lennon Anderson, P.E., Florida Department of Environmental Protection, Southeast District Office [Lennon.Anderson@dep.state.fl.us]

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) (Date)

FACILITY AND PROJECT DESCRIPTION

Proposed Project

Taurus International Manufacturing, Inc. is a facility that manufactures small firearms. This project is for a Natural minor, initial non-Title V State Air Construction Permit for existing but previously unpermitted emissions units, and authorization to complete a bi-fuel retrofit on both diesel generators at the facility. Operations include metal injection molding, debinding, sintering, and test firing. The facility has a 75 yard firing range and six (6) smaller test firing "Snail" Machines all used solely for testing of new and/or repaired small arms. The facility also has two (2) diesel fired generators. The facility consists of the following emissions units.

Facility ID No. 0251334	
ID No.	**Emission Unit Description**
001	**Metal Injection Molding (MIM)/Debinding/Sintering**
002	**Firing Ranges**
003	**Diesel/Natural Gas Fired Generators**

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility is a natural minor, non-Title V source of air pollution.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Miami-Dade County Department of Environmental Resources Management (DERM), Air Quality Management Division. The DERM's mailing address is: 701 NW 1 Court, Suite 400, Miami, Florida 33136. The DERM's telephone number is 305/372-6925.
   All documents related to applications for permits to operate an emissions unit shall be submitted to the DERM Air Quality Management Division.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the DERM Air Quality Management Division. The mailing address of the DERM Air Quality Management Division is: 701 NW 1 Court, Suite 400, Miami, Florida 33136. The DERM's telephone number is 305/372-6925.

3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions;
   d. Appendix D. Common Testing Requirements. (if applicable)
   e. Appendix E. 40 CFR 63 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.
   f. Appendix F. 40 CFR 60 Subpart A – General Provisions
   g. Appendix G. 40 CFR 1039, Subpart F – Test Procedures

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, F.A.C. and Chapter 24, Code of Miami Dade County. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the DERM or Florida Department of Environmental Protection (FDEP) may require the permittee to conform to new or additional conditions. The DERM or FDEP shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the DERM or FDEP may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the DERM upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the DERM. Such permit shall be obtained prior to beginning construction or modification.
   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:
   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through

(12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

(b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Application for Air Operation Permit: This permit authorizes construction and/or installation of the permitted emission unit(s) and initial operation to determine compliance with the FDEP and Miami Dade County rules. **An operation permit is required for regular operation of the permitted emission units.** The owner or operator shall apply for and receive an operation permit prior to expiration of this permit. An application for an operation permit shall be submitted to the Miami-Dade County Department of Environmental Resources Management, Air Quality Management Division. To apply for an operation permit, the applicant shall submit the appropriate application fee and, in triplicate, the appropriate application form, a certification that construction was completed with a notation of any deviations from the conditions on the construction permit, compliance test results, and such additional information as the DERM may by law require.
[Rule 62-4.030, 62-4.050, 62-4.220, and 62-210.300 F.A.C.]

9. Extension of This Permit: The expiration date of this construction permit may be extended upon request of the owner or operator and submission of the appropriate fee to the Miami-Dade County, Department of Environmental Resources Management, Air Quality Management Division **at least 60 days prior** to the expiration date of this permit.
[Rule 62-4.030, 62-4.050, 62-4.070(3), and 62-4.220 F.A.C.]

10. Annual Operating Report Required: The Annual Operating Report (DEP Form No. 62-210.900(5)) shall be completed each year and submitted to the Miami Dade County, DERM, Air Quality Management Division Office or submitted electronically to the FDEP by April 1 of the following year.
[Rule 62-210.370(3) F.A.C.]

11. Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous wastes in accordance with all applicable Federal, State and Local regulations.

Subsection A. Metal Injection Molding, Debinding, Sintering & Firing Ranges (EU 001 & 002)

This subsection of the permit addresses the following emissions unit(s).

ID No.	Emissions Unit Description
001	**Metal Injection Molding (MIM):** Five (5) Metal Injection Molding Machines

Manufacturer	Arburg	Arburg	Arburg	Battenfield	Battenfield
Model No.	470S 1000-290	420 1000-250	270C 300-100	BA 500-200 CDK-SE	EM 30/55
Serial No.	210993	197752	199239	25591	128878-100
Capacity (tons)	110	110	33	55	30
Screw Diameter (mm)	30	35	20	20	20
Manufacture Date	03/2009	06/2005	12/2009	01/2002	01/2005
Voltage (V/HZ)	460/3-60	460/3-60	460/3-60	230-3/460-3	230-3/460-3
Total Current (A)	48	51	45	25/25	50/30
Total Connected Load (Kw)	28	31	25	25/50	50/30

Debinding:
Two (2) Debinding Ovens. Each oven is equipped with one (1) natural gas fired afterburner.
Manufacturer: Elnik Systems
Model No. CD 3045
Frame Size: 27”W x 58”D x 102”H
Oven Operating Temperature Range: 20 – 150^{0}C (68 – 302^{0}F)
Afterburner Operating Temperature Range: 900 – 1200^{0}C

Sintering:
Three (3) Sintering Ovens. Each oven is equipped with one (1) natural gas fired afterburner.
Manufacturer: Elnik Systems
Model No: Two (2) MIM 3045 and one (1) MIM 3009
Afterburner Operating Temperature Range: 900 – 1200^{0}C

002

Firing Ranges:

One (1) 75 yard firing range. This range is ventilated using two (2) large Greenheck exhaust fans each drawing 3,000 cfm through the length of the range, then through HEPA filters; Camfil Model No. 12XS – 24 x 24 x 12, and out through the roof with make-up air being drawn from elsewhere in the facility.

Six (6) small test firing “snail machines”:
Each snail machine is bullet/steel trap, shaped like a box of dimensions 47”L x 18”W x 54”H into which firearms are test fired. The specific model used at the facility is the Savage Range Systems “Gunsmith Series – Model No. GDH. Each trap is situated in individual test rooms.

OPERATIONAL REQUIREMENTS

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.]

2. Facility Wide VOC Emissions: Emissions of volatile organic compounds (VOCs), including hazardous air pollutants "HAPs", shall not equal or exceed 100 tons in any consecutive 12-month period.
   [Rule 62-4.070(3), F.A.C.]

3. Facility Wide HAP Emissions: Total emissions of all hazardous air pollutants (HAPs) shall not equal or exceed 25 tons in any consecutive 12-month period.
   [Rule 62-4.070(3), F.A.C.]

4. Facility Wide Individual HAP Emissions: Emissions of any individual hazardous air pollutant (HAP) shall not equal or exceed 10 tons in any consecutive 12-month period.
   [Rule 62-4.070(3) F.A.C.]

5. Hours of Operation: The referenced emission units(s) may operate 24 hours/day, 7 days/week for 52 weeks/year resulting in 8,760 hours in any consecutive 12-month period.
   [Rules 62-4.070(3), and 62-210.200(PTE), F.A.C.]

6. Allowable Fuel: Fuel for the afterburner shall be limited to natural gas.
   [Rule 62-4.070(3), F.A.C.]

REPORTING AND RECORDKEEPING REQUIREMENTS

7. VOC Content and Emissions: The owner or operator shall determine the VOC content of all materials, including solvents, and shall monitor the usage of such materials at the referenced emission 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 emission unit(s).
   c. The total monthly VOC emission 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 emission rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.

   [Rule 62-4.070(3), F.A.C.]

8. Individual & Total HAP Content and Emissions: The owner or operator shall determine the total and individual HAP contents of all materials, including solvents, and shall monitor the usage of such materials at the referenced emission 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 emission unit(s).
   c. The individual and total monthly HAP emission 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 emission 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.]

9. Supporting Documentation: The permittee shall maintain supporting documentation, such as Material Safety Data Sheets, purchase orders, usage and disposal records, etc., and shall include sufficient information to determine compliance. The log and documents shall be kept at the facility and made available for DERM inspection for a minimum of three (3) years from the date of such records. Monthly logs shall be completed within 10 calendar days after completion of the preceding month.
   [Rule 62-4.070(3), F.A.C.]

Subsection B. Generators (EU 003)

This subsection of the permit addresses the following emissions unit.

ID. No	Emissions Unit Description
003	**Two (2) Diesel/Natural Gas Fired Generators** Manufacturer: Volvo Penta Engine Family No. 8VPXL16.1ACW Engine Model No: TWD1643GE Serial No: 2016035562 Manufactured 10/20/2008 Serial No: 2016036656 Manufactured 11/27/2008 No. of Cylinders/Engine: 6 Engine Displacement: 2.69L/Cylinder Power: 674 kW (917 HP)

OPERATIONAL REQUIREMENTS

1. Rule Applicability: This emissions unit shall comply with all the applicable standards contained in 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Ignition Internal Combustion Engines, 40 CFR 60 Subpart A – General Provisions, 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, and 40 CFR 63 Subpart A – General Provisions. Stationary RICE subject to Regulations under 40 CFR Part 60, that is a new or reconstructed stationary RICE located at an area source must meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR Part 60 Subpart IIII, for compression ignition engines or 40 CFR Part 60 Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under 40 CFR 63 Subpart ZZZZ.
   [40 CFR 60.4200, 40 CFR 63.6580, and 40 CFR 63.6590(c)]

2. 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.]

3. Fuel Requirements: The permittee must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel as follows:
   (1) Limit the diesel fuel sulfur content (for NR diesel fuel) to a maximum of 15 ppm = 0.0015% weight
   (2) Limit the cetane index or aromatic content as follows:
      (i) A minimum cetane index of 40: or
      (ii) A maximum aromatic content of 35 volume percent
   [40 CFR 60.4207(b)]

4. Permit Requirement: Pursuant to Rule 62-210.300(1), F.A.C., the permittee shall apply for and obtain an Air Construction Permit prior to the installation of any control device in the exhaust stream of the engines.
   [Rule 62-210.300(1), F.A.C.]

5. Hours of Operation: The total hours of operation for both engines combined shall not exceed 1,000 hours in any consecutive 12-month period.
[Rule 62-4.070(3), and Requested by Applicant in Application No. 0251334-001-AC]

EMISSIONS LIMITATIONS

6. Emissions Standards: The permittee must comply with the emission standards for new CI engines in 40 CFR 60.4201, as applicable. The permittee must certify the engines to the certification emission standards for new nonroad CI engines in 40 CFR 89.112, 40 CFR 89.113, 40 CFR 1039.101, 40 CFR 1039.102, 40 CFR 1039.104, 40 CFR 1039.105, 40 CFR 1039.107, and 40 CFR 1039.115, as applicable, for all pollutants, for the same model year and maximum engine power. Pursuant to 40 CFR 89.112 and 40 CFR 89.113, the emissions standards for all pollutants for these engines are as follows:

Pollutant	Emissions Standards (g/kW-hr)
NMHC + NO_X	6.4
CO	3.5
PM	0.20

The permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4204 according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.
[40 CFR 60.4204(b), 40 CFR 60.4201(a), 40 CFR 60.4206, and Rule 62-4.070(3), F.A.C.]

COMPLIANCE REQUIREMENTS

7. (a) The permittee must operate and maintain the stationary CI ICE and control device according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, the permittee may only change those settings that are permitted by the manufacturer. The permittee must also meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to the permittee.
   (b) Reserved
   (c) The permittee must comply by purchasing an engine certified to the emissions standards in 40 CFR 60.4204(b), as applicable. The engine must be installed and configured to the manufacturer's specifications.
   (d) Reserved
   (e) Reserved
   [40 CFR 60.4211, and Rule 62-4.070(3), F.A.C.]

PERFORMANCE TESTS

8. Test Methods and Procedures: Owners and operators (the permittee) of stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests pursuant to 40 CFR 60 Subpart IIII must do so according to paragraphs (a) through (d) of this section.

   (a) The performance test must be conducted according to the in-use testing procedures in 40 CFR part 1039, subpart F (See Appendix G attached).
   (b) Reserved

(c) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \times (\text{STD}) \qquad \text{(Eq. 1)}$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable.

Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in 40 CFR 60.4213 of 40 CFR 60, Subpart IIII, as appropriate.

(d) Reserved
[40 CFR 60.4212]

9. Test Frequency: The permittee shall conduct a compliance test for NMHC + NO_X, CO, and PM that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit. The permittee has the option of testing both engines or one single engine. If the permittee chooses to test one engine, the following criteria shall apply:
(1) The permittee use replacement components that are built to common specifications, where applicable.
(2) The permittee have written assembly instructions that adequately describe all necessary steps to ensure proper installation.
(3) The conversion is performed by competent personnel.
(4) The process includes a final check to verify that the conversion was performed properly.
[Rules 62-4.070(3), and 62-297.310(7)(a)(1), F.A.C.]

NOTIFICATION, REPORTING & RECORDKEEPING REQUIREMENTS

10. Diesel Fuel Consumption Records: The permittee shall maintain a log to document the monthly, and rolling 12-month diesel fuel consumption.
[Rule 62-4.070(3), F.A.C.]

11. Diesel Fuel Sulfur Content, Cetane Index or Aromatic Content: The permittee shall maintain records to demonstrate that each shipment of diesel fuel does not exceed the specified sulfur content, cetane index or aromatic content.
[Rule 62-4.070(3), F.A.C.]

12. Record of Hours: The permittee shall keep a log to document the consecutive 12-month hours of operation for each generator.
[Rule 62-4.070(3), F.A.C.]

13. Supporting Documentation: The permittee shall maintain supporting documentation, such as maintenance records, purchase orders, usage and disposal records, etc., and shall include sufficient information to determine compliance. The log and documents shall be kept at the facility and made available for DERM inspection for a minimum of three (3) years from the date of such records. Monthly logs shall be completed within 10 calendar days after completion of the preceding month.
[Rule 62-4.070(3), F.A.C.]