

Mission:

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



Rick Scott
Governor

John H. Armstrong, MD, FACS
State Surgeon General & Secretary

Vision: To be the Healthiest State in the Nation

June 06, 2013

ELECTRONIC CORRESPONDENCE

Castellon_lisa10@yahoo.com

Sonavation, Inc.
3970 RCA Boulevard, Suite 7003
Palm Beach Gardens, FL 33410

Authorized Representative:
Lisa Castellon, Owner's Engineering Manager

Re: Project No. 0990702-001-AC
Sonavation, Inc.
Biometric Products Manufacturing Facility
DRAFT Air Construction Permit

Dear Ms. Castellon:

On April 19, 2013, you submitted an application requesting air construction permit for the construction of a biometric products manufacturing facility. The facility will consist of an emissions unit that comprises 18 dicers and 4 grinders connected to one exhaust pipe loop tied to a baghouse. This facility will be located in Palm Beach County at 3970 RCA Boulevard, Suite 7003 in Palm Beach Gardens, Florida. Enclosed are the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit and Appendices; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Laxmana Tallam, P.E., at (561) 837-5900.

Sincerely,

James E. Stormer, Q.E.P., Environmental Administrator
Air & Waste Section
Division of Environmental Public Health

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Sonavation, Inc.
3970 RCA Boulevard, Suite 7003
Palm Beach Gardens, FL 33410

Authorized Representative:
Lisa Castellon, Owner's Engineering Manager

Project No. 0990702-001-AC
DRAFT Air Construction Permit
Palm Beach County, Florida

Facility: Biometric Products Manufacturing Facility

Project: Construction of a biometric products manufacturing facility

Facility Location: Sonavation, Inc. proposes to construct a new biometric products manufacturing facility (facility) to be located at 3970 RCA Boulevard, Suite 7003 in Palm Beach Gardens, Florida in Palm Beach County.

Project: The facility will consist of an emissions unit that comprises 18 dicers and 4 grinders connected to one exhaust pipe loop tied to a baghouse.

The facility will process Lead Zirconate Titanate (composite) to manufacture biometric components used for a fingerprint technology developed for anti-fraud purposes. The composite contains 72% of lead oxide. The emissions, lead oxide, from the process is calculated by the use of material balance and knowledge of the process. The facility proposes to take limit on the usage of Lead Zirconate Titanate of 20,789 pounds in a year to escape the Title V permitting requirement. The lead oxide emissions from the facility, based on the usage of the composite and the baghouse efficiency, will result in to 13.5 pounds (0.007 tons) per year, which is less than 5 tons per year –the major source (Title V) threshold.

The emissions of lead oxide will be controlled by a pulse jet type baghouse with minimum of 99% removal efficiency.

Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Florida Department of Health Palm Beach County (Health Department). The Permitting Authority's physical address is: 800 Clematis Street, West Palm Beach, Florida 33402. The Permitting Authority's mailing address is: P.O. Box 29, West Palm Beach, Florida 33402. The Permitting Authority's telephone number is (561) 837-5900.

The Florida Department of Environmental Protection (DEP) has permitting jurisdiction for this project pursuant to Section 403.087 of the Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the DEP recognizes the Health Department as the approved local air pollution control program in Palm Beach County. As such, the DEP and the Health Department have entered into a Specific Operating Agreement that authorizes the Health Department to issue or deny permits to for this type of air pollution source located in Palm Beach County. Accordingly, the Health Department issues this permit under the provisions of Chapter 403, F.S. and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.).

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Permitting Authority's Legal Office, located at 800 Clematis Street in West Palm Beach, Florida, 33402 (Telephone: (561) 837-5900). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Health Palm Beach County
DRAFT Air Construction Permit
Project No. 0990702-001-AC
Sonavation, Inc.
Palm Beach County, Florida

Applicant: The applicant for this project is Sonavation, Inc. The applicant's authorized representative and mailing address is: Lisa Castellon, Owner's Engineering Manager, Sonavation, Inc., 3970 RCA Boulevard, Suite 7003, Palm Beach Gardens, FL, 33410.

Facility Location: Sonavation, Inc. proposes to construct a new biometric products manufacturing facility (facility) to be located at 3970 RCA Boulevard, Suite 7003 in Palm Beach Gardens, Florida in Palm Beach County.

Project: The facility will consist of an emissions unit that comprises 18 dicers and 4 grinders connected to one exhaust pipe loop tied to a baghouse.

The facility will process Lead Zirconate Titanate (composite) to manufacture biometric components used for a fingerprint technology developed for anti-fraud purposes. The composite contains 72% of lead oxide. The emissions, lead oxide, from the process is calculated by the use of material balance and knowledge of the process. The facility proposes to take limit on the usage of Lead Zirconate Titanate of 20,789 pounds in a year to escape the Title V permitting requirement. The lead oxide emissions from the facility, based on the usage of the composite and the baghouse efficiency, will result in to 13.5 pounds (0.007 tons) per year, which is less than 5 tons per year –the major source (Title V) threshold.

The emissions of lead oxide will be controlled by a pulse jet type baghouse with minimum of 99% removal efficiency.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Florida Department of Health Palm Beach County (Health Department). The Permitting Authority's physical address is: 800 Clematis Street, West Palm Beach, Florida 33402. The Permitting Authority's mailing address is: P.O. Box 29, West Palm Beach, Florida 33402. The Permitting Authority's telephone number is (561) 837-5900.

The Florida Department of Environmental Protection (DEP) has permitting jurisdiction for this project pursuant to Section 403.087 of the Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the DEP recognizes the Health Department as the approved local air pollution control program in Palm Beach County. As such, the DEP and the Health Department have entered into a Specific Operating Agreement that authorizes the Health Department to issue or deny permits to for this type of air pollution source located in Palm Beach County. Accordingly, the Health Department issues this permit under the provisions of Chapter 403, F.S. and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.).

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-256, 62-257, 62-281, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period

(Public Notice to be Published in the Newspaper)

of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Permitting Authority's Legal Office, located at 800 Clematis Street in West Palm Beach, Florida, 33402 (Telephone: (561) 837-5900). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Sonavation, Inc.
3970 RCA Boulevard, Suite 7003
Palm Beach Gardens, FL 33410

Facility ID No. 0990702

PROJECT

Project No. 0990702-001-AC
Application for Initial Air Construction Permit
Biometric Products Manufacturing Facility

COUNTY

Palm Beach, Florida

PERMITTING AUTHORITY

Florida Department of Health Palm Beach County
Division of Environmental Public Health
Air & Waste Section
800 Clematis Street, P.O. Box 29
West Palm Beach, FL 33402

June 06, 2013

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (DEP) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

In accordance with Section 403.182, F.S., the Florida Department of Environmental Protection (DEP) recognizes the Florida Department of Health Palm Beach County (Health Department) as the approved local air pollution control program in Palm Beach County. As such, the DEP and the Health Department have entered into a Specific Operating Agreement that authorizes the Health Department to issue or deny permits to for this type of air pollution source located in Palm Beach County.

Glossary of Common Terms

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

Facility Description and Location

Sonavation, Inc. proposes to construct a new facility to manufacture biometric components used for a fingerprint technology developed for anti-fraud purposes. The facility is categorized under Standard Industrial Classification Code No. 3674. The facility will be located in Palm Beach County at 3970 RCA Boulevard, Suite 7003, Palm Beach Gardens, Florida. The UTM coordinates of the new facility are Zone 17, 589.81 km East, and 2968.7 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- 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.
- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility is not subject to Lead RACT (Rule 62-296.600, F.A.C.) because the site is in an area that is in attainment for air pollution, including lead components.

Project Description

The biometric products manufacturing facility (facility), owned by Sonavation, Inc. (permittee), will be located at 3970 RCA Boulevard, Suite 7003, Palm Beach Gardens, Florida 33410 in Palm Beach County. The site is accessible by RCA Boulevard.

The facility will use the composite for the manufacturing process of biometric components used for a fingerprint technology developed for anti-fraud purposes. According to the material safety data sheet (MSDS) submitted by the permittee, the composite contains maximum of 72 percent of litharge (lead oxide). The permittee plans to limit the usage of the composite per year in order to limit the emissions of lead oxide.

In this air construction permit application, the permittee has proposed to construct the facility that will consist of 18 dicers and 4 grinders, which are used for processing Lead Zirconate Titanate, also known as solid ceramic composites (composite), containing litharge (lead oxide). All the dicers and grinders will have individual exhaust pipe connected to a main header pipe that eventually connects to a baghouse before emitting the pollution to the atmosphere. The entire process of manufacturing the biometric components in the facility will be used as a single emissions unit for this permitting purpose. The emissions unit will contain one baghouse to control the emissions.

The permittee plans to use 20,789 pounds of the composite in a 12-months period, rolling total. The lead oxide emissions from the facility, based on the usage of the composite and the baghouse efficiency, will result in to 13.5 pounds (0.007 tons) per year, which is less than 5 tons per year –the major source (Title V) threshold.

Facility Regulatory Classification

The facility is classified as a new minor source under the Federal and State preconstruction review regulations (40 CFR 52.21, Chapters 62-210.300, 62-212.300, and 62-212.400, F.A.C.) based on potential emissions of lead compound. The permittee has requested the limit in usage of Lead Zirconate Titanate (composite) to 20,789 pounds per year and hence the limit in emissions of lead oxide to 13.5 pounds in a consecutive 12-months period, rolling total. The facility is classified as a synthetic minor source under the Title V operating permit program (40 CFR Part 70 and Chapter 62-210.200, F.A.C.). The facility is further classified as a synthetic-minor source of the Hazardous Air Pollutants (HAPs) with maximum individual HAP emissions less than 10 tons per year and total HAPs emissions of less than 25 tons per year (Title III of the 1990 CAAA).

Processing Schedule

04-19-2013: Health Department received application for Air construction permit
05-05-2013: Health Department received a revised application for air construction permit
06-05-2013: Health Department received a revised baghouse removal efficiency and emissions calculation sheets.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the “significant emission rates” defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_x); sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS), including H₂S; reduced sulfur compounds, including H₂S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO₂ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m³, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered “significant” for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

PSD Applicability for Project

The Florida Department of Environmental Protection regulates major air pollution sources in accordance with Florida’s Prevention of Significant Deterioration (PSD) program, as approved by EPA in Florida’s State Implementation Plan and defined in Rule 62-212.400, F.A.C. A PSD review is required only in areas currently in attainment with the National Ambient Air Quality Standards (NAAQS) or areas designated as “unclassifiable” for a given pollutant. A facility is considered “major” with respect to PSD if it emits or has the potential to emit:

- ≥ 250 tons per year of any regulated pollutant, or
- ≥ 100 tons per year of any regulated pollutant and belonging to one of 28 PSD Major Facility Categories, or

The facility has requested the limit in usage of the composite to 20,789 pounds per year and hence the limit in emissions of lead oxide to 13.5 pounds (0.007 tons) in a consecutive 12-month period, rolling total.

Summary of Potential-to-Emit (PTE):

Pollutant	Proposed Potential Emissions (TPY)	PSD Major Source Threshold (TPY)	Subject to PSD?
Lead Oxide	0.007	250	No

State Requirements

The proposed project is subject to preconstruction review under the applicable provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS). The proposed project is exempt from review under Rule 62-212.400 F.A.C., Prevention of Significant Deterioration (PSD). The proposed facility shall comply with all applicable provisions of the Florida Administrative Code and, specifically, the following chapters and rules:

F.A.C. Chapter 62-4	- Permitting Requirements.
F.A.C. Chapter 62-204	- Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
F.A.C. Chapter 62-210	- Required Permits, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
F.A.C. Chapter 62-212	- General Preconstruction Review Requirements, PSD Requirements
F.A.C. Chapter 62-256	- Open Burning and Frost Protection Fires
F.A.C. Chapter 62-257	- Asbestos Program
F.A.C. Chapter 62-296	- General Pollutant Emission Limiting Standards.
F.A.C. Chapter 62-297	- Test Methods

Federal NESHAP Provisions

The proposed project shall comply with all applicable provisions of the following National Emission Standards for Hazardous Air Pollutants (NESHAP) rule:

40 CFR 61, Subpart M	- Asbestos
----------------------	------------

3. APPLICATION REVIEW

Process Description and Control Philosophy

The facility will process Lead Zirconate Titanate (composite) to manufacture biometric components used for a fingerprint technology developed for anti-fraud purposes. The main component used in the process is litharge (lead oxide). It is introduced into the process as a solid ceramic composite in an intermittent batch process. The composites are then ground off of the solid parts in dicing and grinding machines.

The process for this manufacturing facility will include 18 dicers and 4 grinders. The process will be flushed and cooled by a closed loop de-ionized (DI) water treatment system, which carries off the removed material. Within the closed loop DI system the removed material is filtered by series of media and cartridge filters. The waste media is collected and disposed off appropriately.

Each dicer/grinder will have an exhaust pipe connected to a main header pipe. The header pipe will maintain a negative pressure differential of -2 inches of water through all the dicers and grinders to capture all the air stream and avoid any fugitive emissions of lead oxide in the working area. All the air entrained emissions will pass through the exhaust pipes and to the header pipe. The header pipe is then connected to the baghouse before emitting the air pollution to the atmosphere. The baghouse will maintain a maximum pressure difference of 10 inches of water. The main header and baghouse will be heated and insulated above the dew point temperature of the gas to avoid water condensation in the piping and baghouse.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Discussion of Emissions

The facility plans to process maximum of 20,789 pounds of Lead Zirconate Titanate (composite) in any consecutive 12 months period. The emission of lead oxide, corresponding to the limit in the usage of the composite, is calculated to be 13.5 pounds per year.

Following table details the emission calculation provided by the facility:

Item No.	Description	Qty (Lbs)	Qty (Tons)	Remarks
1	Total quantity of Lead Zirconate Titanate (composite) processed in a year	20,789	10.395	Facility's plan to limit the usage of the composite to limit the emissions of lead oxide.
2	Total lead oxide input in a year	14,968	7.484	The composite contains maximum of 72% lead oxide, per MSDS Sheet provided in the permit application.
3	Lead oxide dust resulting from the process in a year	13,471	6.736	Facility assumes 90% will result in dust and hence waste; remaining only 10% of lead oxide will be retained in the final product.
4	Lead oxide removed by cooling water in a year	12,124	6.062	Facility assumes 90% of the lead oxide dust will be mixed with the cooling water used during the process of dicing/grinding. Remaining 10% will go in the air stream.
5	Lead oxide in gas stream in a year	1,347	0.674	Item 4 subtracted from Item 3 (10% of the dust lead oxide)
6	Lead oxide in gas stream captured by baghouse in a year	1,333.5	0.667	Facility assumes baghouse removal efficiency of 99%
7	Lead oxide emitted to the atmosphere in a year	13.5	0.007	Item 6 subtracted from Item 5

The calculation, as illustrated in the table above, shows that the emission of lead oxide will be 13.5 pounds (0.007 tons) in a year. However, the calculation is based of several assumptions made by the permittee. The permittee assumes that the ninety percent (90%) of the lead oxide in the composite will result in lead oxide dust during the process. The permittee also assumes that ninety percent (90%) of the dust will be captured in the cooling water stream used in the dicing/grinding process. This means the remaining ten percent (10%) of the dust will become entrained in the exhaust air stream. The permittee also assumes that the baghouse removal efficiency of ninety nine percent (99%).

Method of Compliance

The emission calculation submitted in the permit application contains several assumptions made by the permittee. The permittee will conduct an initial stack test within 180 days of the initial start-up of the facility to verify the assumptions made during the calculation of the emission. The permittee plans to test the emission upstream and downstream of the baghouse to ensure at least ninety nine percent (99%) removal efficiency of the baghouse. The permittee will also calculate the total quantity of the composite used during the testing period. The comparison of the quantity of the composite used and the emissions of lead oxide upstream and downstream of the baghouse will verify the permittee's assumptions during the emission calculation. The permittee will submit the detail testing plan prior to the initial testing for the Health Department's review and approval. The testing plan will contain the identification of the test methods, detail description regarding the verification of the emissions calculation assumptions by the use of such methods, date and time of the test. The facility is not required to conduct annual

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

compliance tests. The initial stack test result will provide assurance to the Health Department that the facility will achieve the emissions goal by the method of monitoring and recordkeeping.

The permittee will monitor the usage of the composite on monthly basis. The emission of lead oxide will be calculated based on the use of composite on any given month. The permittee will maintain the record of monthly composite usage and monthly emissions of lead oxide. The permittee will also maintain the records of 12 months rolling total of composite usage and the emission of lead oxide.

Control Equipments

The permittee proposes to install 0.5 micron (0.5µm) fabric filter low temperature pulse jet type baghouse, dustex CJU-510 or equivalent, to control the emission of lead oxide. The design emission control efficiency of the baghouse is 99%. The permittee will monitor the pressure differential at the baghouse to ensure the maximum efficiency is achieved. The baghouse will be located indoors as per the facility plot plan submitted by the facility. The baghouse will be equipped with a pressure transmitter that will send a signal to a cleaning cycle system when the pressure drop across the baghouse exceeds approximately 10 inches of water. This cleaning cycle system will provide compressed air that will flow counter currently with the flow of the inlet gas stream knocking all the lead oxide to a compartment located below the baghouse. This compartment will have a drum that would be removed and lead oxide collected and disposed off appropriately. A valve is located between the baghouse and the drum to isolate the process so manufacturing can continue with no interruptions. This cycle will last for approximately 10 seconds. It is expected that these cycles will occur once a month or so due to the limited amount of particulates present in the gas stream.

Air Quality Analysis

Based on a refined modeling analysis, the proposed project will not cause or contribute to a violation of the federal ambient air quality standards for lead. The input data and the analysis result are shown below:

<i>Source of Information</i>		<i>Location</i>		<i>Exhaust Parameters</i>					<i>Emission Rates</i>
Emissions Unit Information	Type	UTM E	UTM N	Base Elev (ft)	Stack Height (ft)	Dia. (ft)	Flow (cfm)	Temp (F)	Lead (lb/hr)
EU-001	Point	589810	2968700	16	31	1	2500	157	0.0022

Building Parameters					
	SW Coordinate UTM - X	SW Coordinate UTM - Y	length (m)	width (m)	Height (ft)
Bldg 1	589806	2968674	136	75	21

Pollutant	Emission rate		Avg Period	NAAQS	Model Concentration
	tpy	lb/hr			
		(per Unit)		(µg/m³)	(µg/m³)
Lead (PB)	0.007	0.0022	Rolling 3-month	0.15	0.017

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

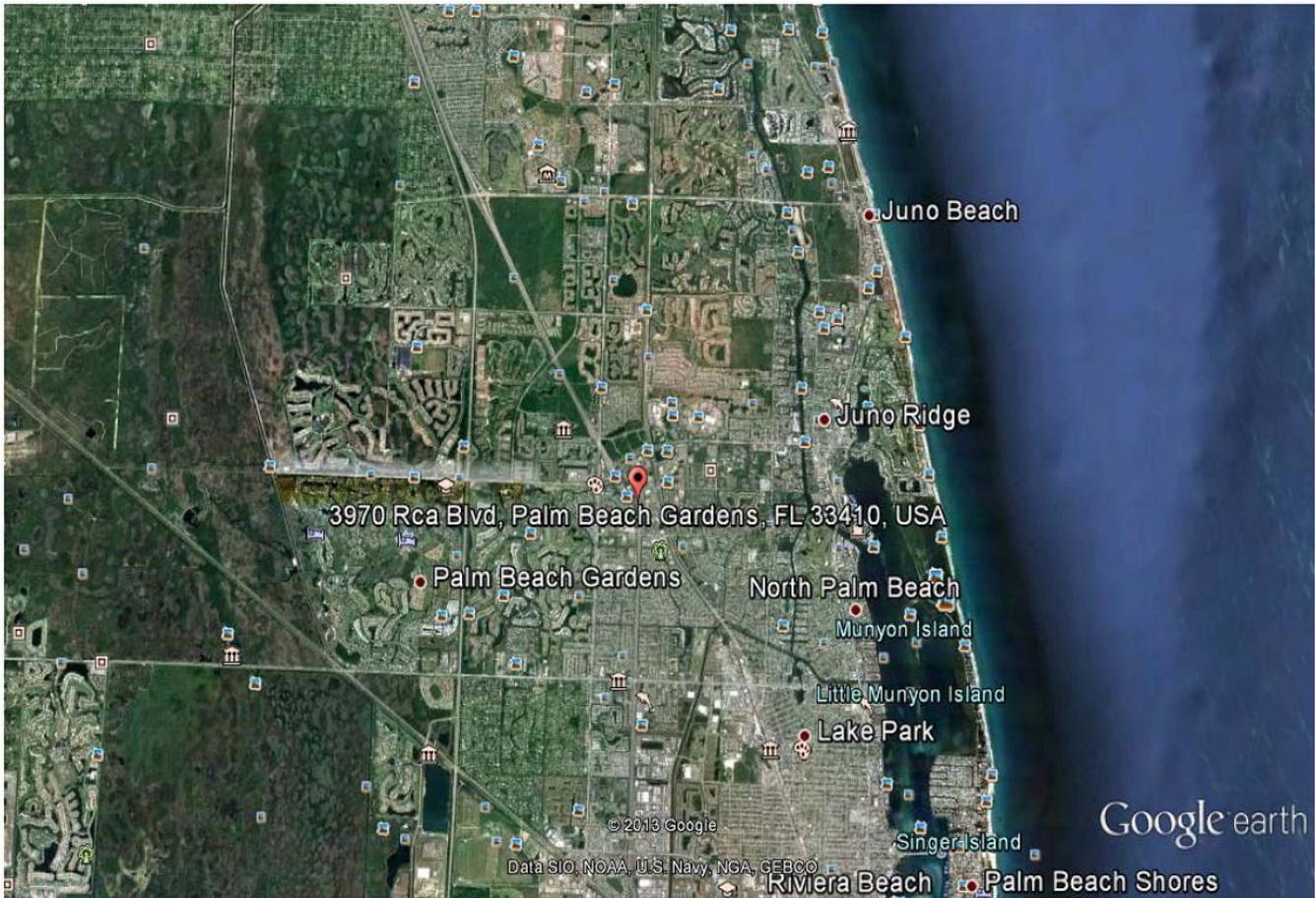
*{Note: The emissions rate of lead (0.0022 lb/hr) is calculated based on the applicant's calculation of total emissions of lead oxide of 13.5 pounds per year and the proposed working schedule of 6120 hours per year (=51 weeks/year *5 days/week*3 shifts/ day*8 hours/shift)}.*

4. PRELIMINARY DETERMINATION

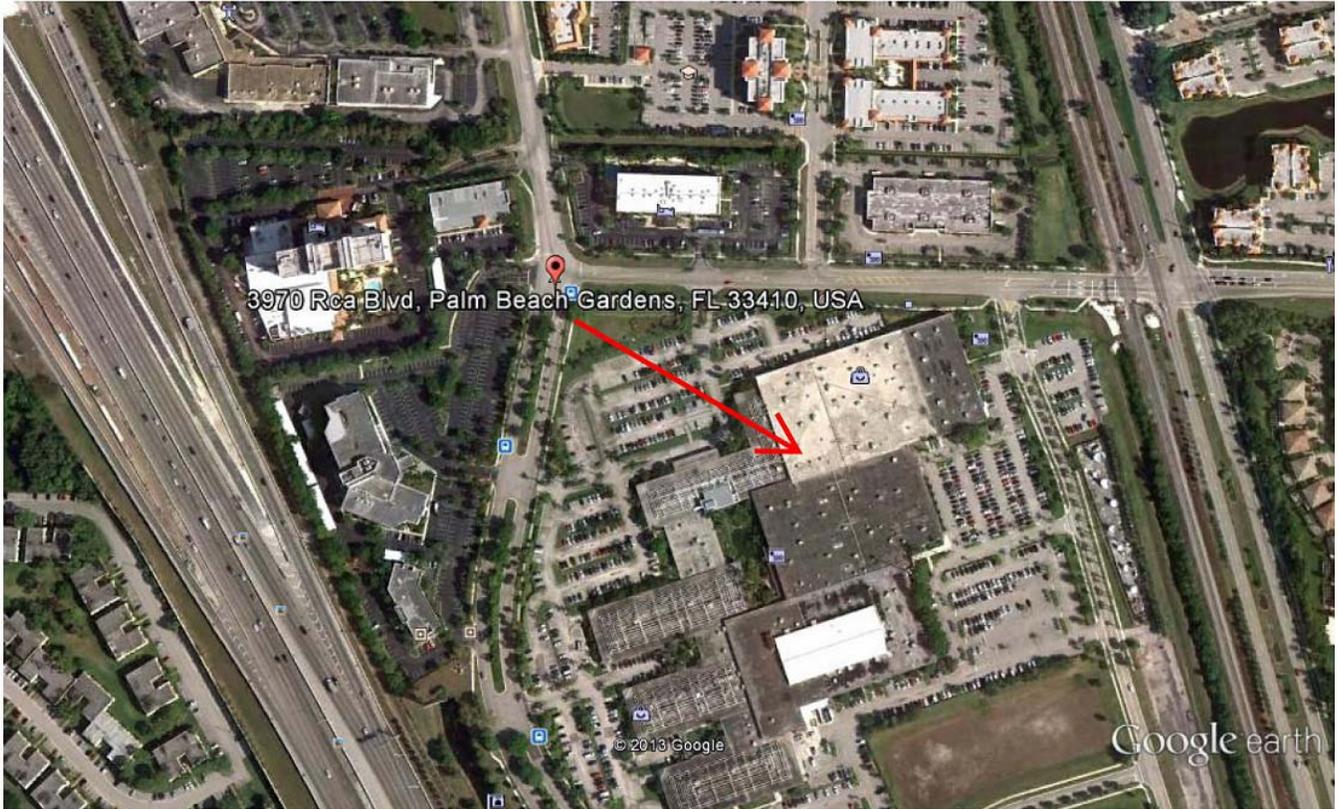
The Health Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Laxmana Tallam, P.E. is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Health Palm Beach County, P.O. Box 29 (800 Clematis Street), West Palm Beach, Fl 33402.

5. APPENDICES

Location Map



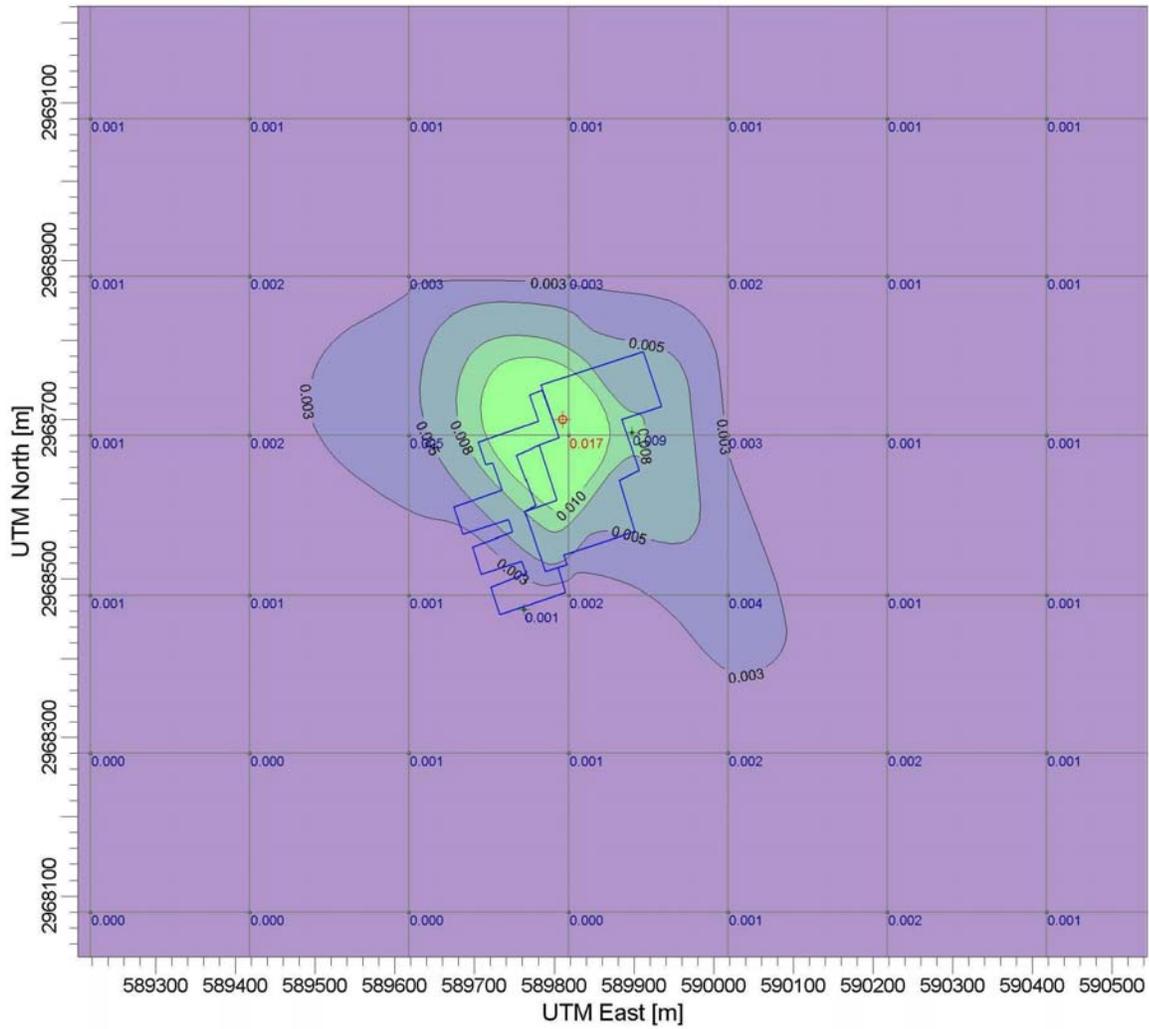
Site Plan



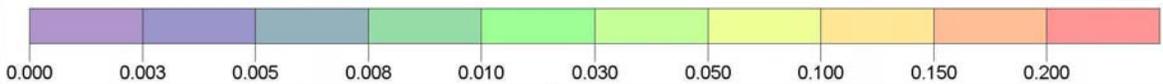
TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Air Modeling Result

PROJECT TITLE:
Sonavation - 0990702-001-AC



ug/m³



COMMENTS: Lead impact based on source emissions of 0.0022 lb/hr and stack height 10 feet from roof.	SOURCES: 1	COMPANY NAME: Department of Health Palm Beach County		
	RECEPTORS: 903	MODELER:		
	OUTPUT TYPE: Concentration	SCALE: 1:8,436 0 0.3 km		
	MAX: 0.01717 ug/m³	DATE: 6/6/2013	PROJECT NO.: 0990702-001-AC	

AERMOD View - Lakes Environmental Software

C:\tallam\My Documents\Air Program Files\Aermod\Sona_0990702\0990702\0990702.isc

Air Modeling Result



Google earth



Mission:

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



Rick Scott
Governor

John H. Armstrong, MD, FACS
State Surgeon General & Secretary

Vision: To be the Healthiest State in the Nation

ELECTRONIC CORRESPONDENCE

Castellon_Lisa10@yahoo.com

PERMITTEE

Sonavation, Inc.
3970 RCA Boulevard, Suite 7003,
Palm Beach Gardens, FL 33410

ARMS No. 0990702
Air Permit No. 0990702-001-AC
Permit Issued: **DRAFT**
Permit Expires: **DRAFT**

Authorized Representative:

Lisa Castellon, Owner's Engineering Manager

Facility: Biometric Products Manufacturing Facility
Project: Initial Air Construction Permit for the construction of biometric products manufacturing facility.

LOCATED AT:

Project Location: Located at 3970 RCA Boulevard, Suite 7003 in Palm Beach Gardens, Florida in Palm Beach County.

UTM Coordinates: Zone 17; 589.81 km E; 2968.7 km N

Latitude: 26° 50' 13.06" North / **Longitude:** 80° 5' 46.02" West

STATEMENT OF BASIS:

The Florida Department of Environmental Protection (DEP) has permitting jurisdiction for this project pursuant to Section 403.087 of the Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the DEP recognizes the Florida Department of Health Palm Beach County (Health Department) as the approved local air pollution control program in Palm Beach County. As such, the DEP and the Health Department have entered into a Specific Operating Agreement (SOA) that authorizes the Health Department to issue or deny permits to for this type of air pollution source located in Palm Beach County. Accordingly, the Health Department issues this permit under the provisions of Chapter 403, F.S. and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The permittee is authorized to perform the work for the proposed project in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Health Department.

ISSUED BY:

Executed in West Palm Beach, Florida

FLORIDA DEPARTMENT OF HEALTH PALM BEACH COUNTY

DRAFT

James E. Stormer, Q.E.P., Environmental Administrator
Air & Waste Section
Division of Environmental Public Health

*Air Permit Engineer: **Laxmana Tallam, P.E.***

Florida Department of Health

Palm Beach County, Division of Environmental Public Health
P.O. Box 29, 800 Clematis Street, West Palm Beach, FL 33402
PHONE: 561-837-5900 • FAX : 561-837-5294

www.FloridasHealth.com

TWITTER:HealthyFLA

FACEBOOK:FLDepartmentofHealth

YOUTUBE: fldoh

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

Proposed Project

The biometric products manufacturing facility (facility), owned by Sonavation, Inc. (permittee), will be located 3970 RCA Boulevard, Suite 7003, Palm Beach Gardens, Florida 33410 in Palm Beach County. The site is accessible by RCA Boulevard.

In this air construction permit application, the permittee has proposed to construct the facility that will consist of 18 dicers and 4 grinders, which are used for processing Lead Zirconate Titanate, also known as solid ceramic composites (composite), containing litharge (lead oxide). All the dicers and grinders will have exhaust pipes connected to a main header pipe that eventually connects to a baghouse before emitting the pollution to the atmosphere. The entire process of manufacturing the biometric components in the facility will be used as single emissions units for this permitting purpose. The emissions unit will contain one control structure, baghouse to control the emissions to the permitted limit.

The facility uses the composite for the manufacturing process of biometric components used for a fingerprint technology developed for anti-fraud purposes. According to the material safety data sheet (MSDS) submitted by the permittee, the composite contains maximum of 72 percent of litharge (lead oxide). The permittee plans to limit the usage of the composite per year in order to limit the emissions of lead oxide.

The permittee has proposed to use 20,789 pounds of the composite in a 12-months period, rolling total. The lead oxide emissions from the facility corresponding to the usage of the composite will result in to 13.5 pounds per year.

The facility is classified as a new minor source under the Federal and State preconstruction review regulations (40 CFR 52.21, Chapters 62-210.300, 62-212.300, and 62-212.400, F.A.C.) based on potential emissions of lead compound. The facility has requested the limit in usage of Lead Zirconate Titanate (composite) to 20,789 pounds per year and hence the limit in emissions of lead oxide to 13.5 pounds per consecutive 12-month period. The facility is classified as a synthetic minor source under the Title V operating permit program (40 CFR Part 70 and Chapter 62-210.200, F.A.C.). The facility is further classified as a synthetic-minor source of the Hazardous Air Pollutants (HAPs) with maximum individual HAP emissions less than 10 tons per year and total HAPs emissions of less than 25 tons per year (Title III of the 1990 CAAA).

This project will construct the following emissions unit.

Facility ID No. 0990702	
ID No.	Emission Unit Description
001	Biometric Products Manufacturing Unit <i>The emissions units consists of 18 dicers and 4 grinders connected to one exhaust header pipe loop tied to a baghouse.</i>

PROCESSING SCHEDULE

04-19-2013: Health Department received application for air construction permit
05-05-2013: Health Department received a revised application for air construction permit
06-05-2013: Health Department received a revised baghouse removal efficiency and emissions calculation sheet.

SECTION 1. GENERAL INFORMATION

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 not subject to Lead RACT (Rule 62-296.600, F.A.C.) because the site is in an area that is in attainment for lead.

PERMIT CONTENT

- **Section 1:** General Information
- **Section 2:** Administrative Requirements
- **Section 3:** Emissions Unit Specific Conditions
 - *Subsection A:* Biometric Products Manufacturing Unit
- **Section 4:** Appendices
 - *Appendix A:* Citation Formats and Glossary of Common Terms
 - *Appendix B:* General Conditions
 - *Appendix C:* General Testing Requirements

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1.0 ADMINISTRATIVE REQUIREMENTS

- 1.1 Permitting Authority: The permitting authority for this project is Florida Department of Health Palm Beach County (Health Department). The Health Department's mailing address is P.O. Box 29 (800 Clematis Street), West Palm Beach, Florida, 33402, and telephone number (561) 837-5900. All documents related to applications for permits to operate an emissions unit shall be submitted to the Health Department. **[Specific Operating Agreement]**
- 1.2 Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Health Department. The mailing address and phone number of the Health Department is P.O. Box 29 (800 Clematis Street), West Palm Beach, Florida, 33402, and telephone number (561) 837-5900. **[Specific Operating Agreement]**
- 1.3 Appendices: The following Appendices are attached as part of this permit:
- Appendix A. Citation Formats and Glossary of Common Terms;
 - Appendix B. General Conditions; and
 - Appendix C. General Testing Requirements
- 1.4 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 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. **[Rule 62-210.300, F.A.C. and SOA]**
- 1.5 New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. **[Rule 62-4.080, F.A.C.]**
- 1.6 Modifications: The permittee shall notify the Compliance Authority 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 Department. 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.]**
- 1.7 Source Obligation:
- Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between constructions of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Health Department in the permit.
 - 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.]**
- 1.8 Operation Permit Required: This permit authorizes construction and/or installation of the permitted emission units and initial operation to determine compliance with Department rules. **An operation permit is required for regular operation of the permitted emission units.** The owner or operator shall **apply for**

SECTION 2. ADMINISTRATIVE REQUIREMENTS

and receive an operation permit prior to expiration of this permit. An application for an operation permit shall be submitted to the Florida Department of Health Palm Beach County, Air and Solid Waste Program. To apply for an operation permit, the applicant shall submit the appropriate application fee and, in quadruplicate, the appropriate application form, a certification that construction was completed with a notation of any deviations from the conditions in the construction permit, compliance test results, and such additional information as the Department may by law require. [Rules 62-4.090, 62-4.050, 62-4.220, and 62-210.300, F.A.C.]

- 1.9 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 Florida Department of Health Palm Beach County, Air and Solid Waste Program **at least 60 days prior** to the expiration date of this permit. [Rules 62-4.050, 62-4.080, and 62-4.220, F.A.C.]

2.0 EMISSION LIMITING STANDARDS

- 2.1 General Particulate Emission Limiting Standards: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, the permittee shall not:

- (a) Cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as No. 1 on the Ringelmann Chart (20 percent opacity). [Rule 62-296.320(4)(b)1, F.A.C.]
- (b) If the presence of uncombined water is the only reason for failure to meet the visible emissions standards given in Rule 62-296.320(4)1, F.A.C., such failure shall not be a violation of the rule. [Rule 62-296.320(4)(b)3, F.A.C.]
- (c) All visible emissions test performed pursuant to the requirements of Rule 62-296.320(4)(b)1., F.A.C. shall use EPA Reference Method 9, and shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)4.a, F.A.C.]

- 2.2 Objectionable Odor Prohibited: The permittee shall not 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.]

Note: An objectionable odor is defined as 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 62-210.200, F.A.C.]

- 2.3 Volatile Organic Compounds Emissions or Organic Solvents Emissions: The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) 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.]
- 2.4 Unconfined Particulate Emission Limiting Standards: The permittee shall not 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 shall include the following:
- (a) Paving and maintenance of roads, parking areas and yards.
 - (b) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - (c) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

- (d) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- (e) Landscaping or planting of vegetation.
- (f) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- (g) Confining abrasive blasting where possible.
- (h) Enclosure or covering of conveyor systems.

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

3.0 PERFORMANCE STANDARDS

- 3.1 Circumvention: The permittee shall not circumvent air pollution control equipment/methods or allow the emission of air pollutants without the equipment/methods operating properly. **[Rule 62-210.650, F.A.C.]**
- 3.2 Excess Emissions Requirements:
- (a) Excess emissions resulting from start-up, shutdown or malfunction of these emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) 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 Health Department for longer duration. **[Rule 62-210.700(1), F.A.C.]**
 - (b) 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 start-up, shutdown, or malfunction are prohibited. **[Rule 62-210.700(4), F.A.C.]**
 - (c) In case of excess emissions resulting from malfunctions, the permittee shall notify the Air Pollution Control Section of the Health Department within one working day of: the nature, extent, and duration of the excess emissions; the cause of the problem; and the corrective actions being taken to prevent recurrence. **[Rule 62-210.700(6), F.A.C.]**
 - (d) Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust the maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. **[Rule 62-210.700(5), F.A.C.]**
- 3.3 Test Procedures: All test methods and procedures shall be performed in accordance with the applicable requirements of Chapter 62-297, F.A.C. **[Rule 62-297.100, F.A.C.]**
- 3.4 Operational Rate During Testing: Unless otherwise stated in the applicable emission-limiting standard for a rule, testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. **[Rule 62-297.310(2), F.A.C.]**
- 3.5 Test Notification: At least 15 days prior to the date on which each formal compliance test is to begin, the permittee shall notify the Health Department in writing of: the test date; the expected test time; the location of the test; the facility contact person responsible for coordinating the test; and the person or company conducting test. The 15 day notification requirement may be waived at the discretion of the Health Department. Likewise, if circumstances prevent testing during the 60-day test window specified for the emissions unit, the owner or operator may request an alternate test date before the expiration of this window. **[Rule 62-297.310(7)(a)9., F.A.C.]**

SECTION 2. ADMINISTRATIVE REQUIREMENTS

3.6 Special Compliance Tests: When the Department, 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 Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. **[Rule 62-297.310(7), F.A.C.]**

4.0 REPORTS REQUIRED

4.1 Annual Operations Report: The annual operating report *[DEP Form No. 62-210.900(5)]* shall be submitted to the Health Department by April 1. If the report is submitted using the Department's electronic annual operating report software (EAOR), there is no requirement to submit a hardcopy to DEP or the Health Department. **[Rule 62-210.370(3)(c), F.A.C.]**

4.2 Excess Emissions Report: If excess emissions occur, the Health Department may request a written summary report of the incident. **[Rules 62-4.130 and 62-210.700(6), F.A.C.]**

4.3 Emission Compliance Stack Test Reports: For each required emissions compliance test, a report indicating the results of the test shall be filed with the Health Department as soon as practical, but no later than 45 days after the last sampling run is completed. The report shall provide sufficient detail on the tested emissions unit and the procedures used to allow the Health Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in **Rule 62-297.310(8)(c), F.A.C.** Additional report information may be specified for a given group of emissions units in this permit. **[Rule 62-297.310(8), F.A.C.]**

4.4 Notifications and Reports: The permittee shall submit all compliance-related notifications and reports required by this permit to the Health Department at:

Florida Department of Health Palm Beach County
Air & Waste Section
Post Office Box 29
800 Clematis Street, 4th Floor
West Palm Beach, Florida 33402-0029
Telephone: (561) 837-5900
Fax: (561) 837-5295

5.0 RECORDKEEPING REQUIREMENTS

5.1 Recordkeeping: The permittee shall ensure that all records of monitoring information shall specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses. **[Rule 62-4.070(3), F.A.C.]**

5.2 Record Retention: The permittee shall retain records of all monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. **[Rule 62-4.070(3), F.A.C.]**

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

This section of the permit addresses the following emissions unit.

ID No.	Emissions Unit Description
001	Biometric Products Manufacturing Unit <i>The emissions units consists of 18 dicers and 4 grinders connected to one exhaust header pipe loop tied to a baghouse.</i>

This emissions unit is not subject to Lead RACT (Rule 62-296.600, F.A.C.) because the site is in Palm Beach County, which is attainment area for lead.

1.0 EQUIPMENT

- 1.1 **Biometric Products Manufacturing Unit:** The permittee is authorized to construct the emissions unit containing 18 dicers and 4 grinders connected to one exhaust header pipe loop tied to a baghouse. The emissions unit will be used for biometric products manufacturing activities. [Application No. 0990702-001-AC]
- 1.2 **Control Equipment:** The permittee is authorized to install a 0.5 micron (0.5µm) fabric filter low temperature pulse jet type baghouse system, Dustex CJU-510 or equivalent. The removal efficiency of the baghouse shall be ninety nine percent (99%) or higher. [Application No. 0990702-001-AC]
- 1.3 **Stack dimension:** The permittee is authorized to install a vertical stack with a rain cap. The vertical stack shall be 12 inches in diameter and 10 feet in height measured from the roof of the building. [Application No. 0990702-001-AC]

2.0 PERFORMANCE RESTRICTIONS

- 2.1 **Permitted Capacity:** The permittee shall not allow, cause, suffer or permit the operation of the unit in excess of the following without prior authorization from the Permitting Authority:

Annual Lead Zirconate Titanate Usage: The Lead Zirconate Titanate usage **shall not exceed 20,789 pounds** in any consecutive 12 months period, rolling total.

[Rule 62-210.200(PTE), F.A.C. and Permittee's request to escape Title V regulations]

{Permitting Note: The permittee has calculated the emissions of lead oxide by material balance and knowledge of the process. Lead Zirconate Titanate (composite) contains 72% of lead oxide according to the MSDS sheet. The permittee assumes that 90% of the lead oxide in the composite will be formed as lead oxide dusts during the dicing and grinding process. The permittee stated that only 10% of the dust lead oxides will be entrained in the air stream and the remaining 90% will be removed by the cooling water process. The emissions of lead oxide to the atmosphere are estimated at 13.5 pounds per year.}

- 2.2 **Hour of Operation:** The hours of operation of are not limited. [Rules 62-4.070(3) & 62-210.200(PTE), F.A.C.]
- 2.3 **Baghouse Operation:** The baghouse shall be in operation according to the manufacturer's specification all the time during the operation of the emissions unit. The permittee shall stop the operation of the emissions unit when the baghouse is out of order, or during the regular maintenance works, including the change of filters. [Rules 62-4.070(3), F.A.C.]
- 2.4 The baghouse shall have the automatic cleaning capability (cleaning cycle system) when the pressure drop across the baghouse exceeds 10 inches of water. [Rules 62-4.070(3), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

2.5 Operating Parameters: The Health Department may establish the operating parameters for the emissions unit based on the initial stack test reports. **[Rules 62-4.070(3), F.A.C.]**

3.0 TESTING REQUIREMENTS

3.1 Initial Compliance Test: The permittee shall conduct an initial compliance stack test at the emissions unit to measure the emissions of lead. The permittee shall test the emissions of lead at upstream and downstream of the baghouse. The initial tests shall be conducted no later than 180 days after initial operation of the unit. **[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]**

3.2 The initial compliance stack test shall verify the following:

- (a) Removal efficiency of baghouse is 99% or more.
- (b) Concentration of lead downstream of baghouse is less than 0.0022 lbs/hr
- (c) Actual concentration of lead upstream of baghouse (lbs/hr)
- (d) Total quantity of composite processed during each one hour run of the test (lbs/hr)

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

3.3 During each test run of the initial stack test, the permittee shall monitor and record the pressure differential across the baghouse at every 15-minutes interval. The permittee shall report the pressure differential record with the stack test report. **[Rule 62-4.070(3), F.A.C.]**

3.4 Test Requirements: The permittee shall notify the Health Department in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix C (General Testing Requirements) of this permit. **[Rule 62-297.310(7)(a)9, F.A.C.]**

3.5 Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Determination of Particulate Matter Emissions from Stationary Sources
5I	Determination of Low Level Particulate Matter Emissions from Stationary Sources
29	Determination of Metals Emission from Stationary Sources

Permittee may choose either Method 5 or Method 29 to measure the emission of lead from the emissions unit. [Rules 62-204.800, F.A.C. and 62-297.100, F.A.C.]

3.6 Detail Testing Plan: The permittee shall submit the Health Department a detail stack testing plan in writing at least 15 days prior to the initial compliance test. The testing plan shall, as a minimum, include the identification of appropriate testing methods, detail description of procedure to verify the emissions calculation assumptions by the use of such methods, date and time of the test.

[Rule 62-297.310(7)(a)9, F.A.C.]

4.0 MONITORING REQUIREMENTS

4.1 Lead Zirconate Titanate Usage Monitoring: The permittee shall monitor the total usage of Lead Zirconate Titanate (pounds) on a monthly basis.

[Rule 62-4.070(3), F.A.C. & Application No. 0990702-001-AC]

4.2 Pressure Differential Monitoring:

4.2.1 The permittee shall monitor the pressure differential at the exhaust header pipe to ensure that the pressure difference is not higher than negative two (-2) inches of water.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

- 4.2.2 The permittee shall monitor the pressure differential across the baghouse. The pressure drop across the baghouse shall not exceed ten (10) inches of water.
- 4.2.3 The permittee shall stop the operation of the emissions unit if the pressure differential readings at the exhaust header pipe or the baghouse do not meet the requirements of the conditions 4.2.1 and 4.2.2 of this section of the permit. The permittee shall identify and resolve the problem to ensure that the pressure differential readings meet the permit requirements before resuming the operation of the emissions unit.

[Rule 62-4.070(3), F.A.C. and Application No. 0990702-001-AC]

- 4.3 The permittee shall conduct the inspection of the baghouse, for any leakage or fabric filter tears, on a monthly basis. The permittee shall maintain the records of the inspection conducted at the baghouse. The records shall include, as a minimum, date and time of inspection, description of any findings, recommendations etc. These records shall be kept on site for a period of no less than five years and be made available to the Health Department representatives upon request. **[Rule 62-4.070(3), F.A.C]**

5.0 RECORDS AND REPORTS

- 5.1 Monthly Lead Zirconate Titanate Usage Records: The permittee shall maintain monthly Lead Zirconate Titanate usage records, on or before the 20th day of the following month. These records shall include, as a minimum, the monthly usage and the rolling 12-month total usage records. These records shall be kept on site for a period of no less than five years and be made available to the Health Department representatives upon request.

[Rule 62-4.070(3), F.A.C. and Application No. 0990702-001-AC]

- 5.2 Monthly Emissions Records: The permittee shall maintain monthly emissions records, on or before the 20th day of the following month, to summarize the emissions of lead oxide. These records shall include, as a minimum, the monthly emissions and the rolling 12-month total emissions of the above mentioned air pollutant. These records shall be kept on site for a period of no less than five years and be made available to the Health Department representatives upon request.

[Rule 62-4.070(3), F.A.C. and Application No. 0990702-001-AC]

- 5.3 Pressure Differential Records: The permittee shall maintain the following pressure differential records:

- 5.3.1 The permittee shall record the pressure differential at the exhaust header pipe and the baghouse before the start of a shift and after the end of the shift. The permittee shall maintain the records of the pressure differential readings for each shift. The record shall include, as a minimum, date and time when reading was taken, shift number (if multiple shifts of operation are conducted), differential pressure reading, name and signature of the person taking the reading.
- 5.3.2 The permittee shall also maintain the record of all the incidents when the pressure differential readings do not meet the requirements of this permit. The records shall contain, as a minimum, date, time and duration of the problem, identification of problem and corrective action taken.
- 5.3.3 The permittee shall maintain the records of the cleaning cycle system conducted at the baghouse when the pressure differential at baghouse exceeds 10 inches of water. The records shall contain, as a minimum, date and time, pressure differential across the baghouse immediately after the cleaning cycle system is completed.
- 5.3.4 The records shall be kept on site for a period of no less than five years and made available to the Health Department representatives upon request.

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

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

- 5.4 Emissions Reporting: The permittee shall report the emissions as recorded pursuant to the specific condition 5.2 of this section of the permit on semi-annual basis for two years from the beginning of the operation. The report shall be submitted to the Health Department before the 20th day following the end of each semi-annual period. **[Rule 62-4.070(3), F.A.C.]**
- 5.5 Test Reports: The permittee shall submit all compliance stack test reports to the Health Department no later than 45 days after the completion of the test. **[Rule 62-297.310(8), F.A.C.]**
- 5.6 Lead oxide disposal: The permittee shall only employ a licensed contractor for collecting and disposing the lead oxide baghouse and the closed loop di-ionized water system from the facility. **[Rule 62-4.070(3), F.A.C.]**
- 5.7 Lead oxide disposal records: The permittee shall maintain the records of all the collection and disposal of lead oxide from the baghouse and the closed loop di-ionized water system. The records shall contain, as a minimum, name of the disposal contractor, name and location of the disposal site, date and time of collection of the lead oxide from the facility. These records shall be kept on site for a period of no less than five years and be made available to the Health Department representatives upon request. **[Rule 62-4.070(3), F.A.C.]**
- 5.8 Baghouse maintenance records: The permittee shall maintain the records of all the maintenance works conducted at the baghouse, including the periodic change of fabric filters. The records shall contain, as a minimum, date and descriptions of maintenance works, baghouse downtime records etc. These records shall be kept on site for a period of no less than five years and be made available to the Health Department representatives upon request. **[Rule 62-4.070(3), F.A.C.]**

SECTION 4. APPENDICES

Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. General Testing Requirements

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number for that county
“001” identifies the specific permit project number
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor source federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CAA: Clean Air Act	NO_x: nitrogen oxides
CMS: continuous monitoring system	NSPS: New Source Performance Standards
CO: carbon monoxide	O&M: operation and maintenance
CO₂: carbon dioxide	O₂: oxygen
COMS: continuous opacity monitoring system	Pb: lead
DARM: Division of Air Resource Management	PM: particulate matter
DEP: Department of Environmental Protection	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
Department: Department of Environmental Protection	ppm: parts per million
dscf: dry standard cubic feet	ppmv: parts per million by volume
dscfm: dry standard cubic feet per minute	ppmvd: parts per million by volume, dry basis
EPA: Environmental Protection Agency	QA: quality assurance
ESP: electrostatic precipitator (control system for reducing particulate matter)	QC: quality control
EU: emissions unit	PSD: prevention of significant deterioration
F.A.C.: Florida Administrative Code	psi: pounds per square inch
F.A.W.: Florida Administrative Weekly	PTE: potential to emit
F.D.: forced draft	RACT: reasonably available control technology
F.S.: Florida Statutes	RATA: relative accuracy test audit
FGD: flue gas desulfurization	RBLC: EPA's RACT/BACT/LAER Clearinghouse
FGR: flue gas recirculation	SAM: sulfuric acid mist
Fl: fluoride	scf: standard cubic feet
ft²: square feet	scfm: standard cubic feet per minute
ft³: cubic feet	SIC: standard industrial classification code
gpm: gallons per minute	SIP: State Implementation Plan
gr: grains	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
HAP: hazardous air pollutant	SO₂: sulfur dioxide
Hg: mercury	TPD: tons/day
I.D.: induced draft	TPH: tons per hour
ID: identification	TPY: tons per year
kPa: kilopascals	TRS: total reduced sulfur
lb: pound	UTM: Universal Transverse Mercator coordinate system
MACT: maximum achievable technology	VE: visible emissions
MMBtu: million British thermal units	VOC: volatile organic compounds
MSDS: material safety data sheets	
MW: megawatt	
NESHAP: National Emissions Standards for Hazardous Air Pollutants	

SECTION 4. APPENDIX B

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. 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 Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. 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 Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. 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 Department rules, unless specifically authorized by an order from the Department.
6. 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 Department rules. This provision includes 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 Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, 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 Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. 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 the Department 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 and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In 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 source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

SECTION 4. APPENDIX B

General Conditions

10. The permittee agrees to comply with changes in Department 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 Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 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 Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - 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 recordings 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 Department rule.
 - c. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. When requested by the Department, 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 Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX C
General Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units at the facility.

COMPLIANCE TESTING REQUIREMENTS

1. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62-297.310(2), F.A.C.]
2. **Applicable Test Procedures - Opacity Compliance Tests:** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.[Rule 62-297.310(4), F.A.C.]
3. **Determination of Process Variables:**
 - a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.[Rule 62-297.310(5), F.A.C.]
4. **Frequency of Compliance Tests:** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
 - a. *General Compliance Testing.*
 1. The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.
 2. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing

SECTION 4. APPENDIX C
General Testing Requirements

an air operation permit pursuant to sub-subparagraph 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- (a) Did not operate; or
 - (b) In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours,
3. During each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for visible emissions, if there is an applicable standard.
4. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
- b. *Special Compliance Tests.* When the Department, 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 Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

[Rule 62-297.310(7), F.A.C.]

RECORDS AND REPORTS

5. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report shall provide the following information.
- a. The type, location, and designation of the emissions unit tested.
 - b. The facility at which the emissions unit is located.
 - c. The owner or operator of the emissions unit.
 - d. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - e. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - f. The date, starting time and end time of the observation.
 - g. The test procedures used.
 - h. The names of individuals who furnished the process variable data, conducted the test, and prepared the report.
 - i. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
 - j. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]