

Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

David B. Struhs Secretary

October 9, 2001

Mr. Edward Zwak Air Brake Specialists 1609 North 31 Street Tampa, Florida 33605

Re: Facility No.: 0571057-002

Dear Mr. Zwak:

The Department has received the Title V General Permit Notification Form for the asbestos manufacturing and fabrication facility that you submitted on August 31, 2001.

Please note that in January of each year the Department will be mailing fee notices to those facilities using the Title V general permit. This annual operation fee is \$50 and it is due and payable between January 15 and March 1 of each year the facility is in operation and is subject to the requirements of the Title V general permit.

If you have or expect to have any changes in your mailing address, location address, responsible official, or phone number, please notify the Department at the following address:

Title V General Permits Office Bureau of Air Monitoring and Mobile Sources MS 5510 Department of Environmental Protection 2600 Blair Stone Road Tallahassee, FL 32399-2400

If there are any changes in the facility status, including change of operating parameters or equipment, of if you have any additional questions regarding the Title V General Permit Program, please contact the district or local air program compliance inspector in your area.

Sincerely,

Dotty Diltz, Chief

Bureau of Air Monitoring and Mobile Sources

DD/jw

cc: Mr. Thomas Shelton, Hillsborough County

Fees Paid 97-00 50C4 Compliance IN

ASBESTOS MANUFACTURING AND FABRICATION FACILITIES AIR GENERAL PERMIT NOTIFICATION FORM

Part III. Notification of Intent to Use General Permit

Prior to filling out this form, please read the instructions provided at the end of the form. Send completed form to the address listed in the instructions and keep a copy of the form for your files.

Fac	cility Notification
1.	Facility Owner/Company Name (Name of corporation, agency, or individual owner):
	AIR BRAKE SPECIALITY, INC
2.	Site Name (For example, plant name or number):
3.	Hazardous Waste Generator Identification Number:
4.	Facility Location: MIR BRAKE SPECINISTS Street Address: 11,09 M. 31 ST
''	Street Address: 1,09 14. 31 57
	City: TAMPA County: HILLIE OROLLON Zip Code: 33605
5	Facility Identification Number (DEP Use ONLY - do not fill in)
	0511057-002
	sponsible Official
6.	Name and Title of Responsible Official:
	Name: EDWARD ZWAK Title: UP
7.	Responsible Official Mailing Address:
}	Organization/Firm: AIR BRIKE SPECEAUSTS Street Address: 1609 14, 31 57
	City: TAMPA County: HILLSBOKO (16 Zip Code: 3360)
8.	Responsible Official Telephone Number: Telephone: (8/3) 247 - 5050 Fax: (8/3) 247 - 4828
	Telephone. (875) 24 7 3056
F oo	cility Contact (If different from Responsible Official)
	Name and Title of Facility Contact (For example, plant manager):
10	Facility Contact Address:
	Street Address:
	City: County: Zip Code:
.11.	Facility Contact Telephone Number:
	Telephone: () - Fax: () -

DEP Form No. 62-213.900(6) Effective: 2/24/99

Facility Inform	nation			
Indicate with an	"X" the classification of your facility.			
[Asbestos Manufacturing			
Ļ	Asbestos Fabrication			
Equipment Mo	onitoring and Recordkeeping Information			
Check all logs w	which are required to be kept on-site in accordance with the requirements of this general permit:			
(a) Visible emis	ssions monitoring			
(b) Equipment is	nspection log []			
Surrender of E	existing DEP Air Permit(s)			
Please indicate v	with an "X" the appropriate selection:			
<u> </u>	I hereby surrender all existing DEP air permits authorizing operation of the facility indicated in this notification form; the permit number(s) are:			
	No DEP air permits currently exist for the operation of the facility indicated in this notification form.			
Responsible Of	fficial Certification			
this notifica statements i maintain th comply with	rsigned, am the responsible official, as defined in Part II of this form, of the facility addressed in ation. I hereby certify, based on information and belief formed after reasonable inquiry, that the made in this notification are true, accurate and complete. Further, I agree to operate and he air pollutant emissions units and air pollution control equipment described above so as to hall terms and conditions of this general permit as set forth in Part II of this notification form. ptly notify the Department of any changes to the information contained in this notification.			
• •				
Print name	of responsible official			
Finit name	of responsible official			
Signature	1-21-01 Date			

DEP Form No. 62-213.900(6) Effective: 2/24/99

Best Available Copy

COMMISSION
Stacy Easterling
Pat Frank
Chris Hart
Jim Norman
Jan Platt
Thomas Scott
Ronda Storms



Administrative Offices, Legal & Water Management Division The Roger P. Stewart Environmental Center 1900 - 4th Ave. - Tampa J.P. 33605 Ph. (813) 373-5960 - Fax (813) 273-5157

Air Management Fix 272-3605 Waste Management Fix 275-256 Wetlands Management Fix 272-7144 1410 N. 21st Street - Tampa, FL 23605

Executive Director
Richard D. Garrity, Ph.D. /

ENVIRONMENTAL PROTECTION COMMISSION of Hillsborough County

FAX Transmittal Sheet

DATE: 10-9-02	
TO: Rick Butler, FOEP, B	Amms
FAX Phone: (850) 922-6979	Voice Phone:
TOTAL NUMBER OF PAGES INCLUD	ING THIS COVER PAGE:
EPC FAX Transmission Line: (813) For retransmission or any FAX	
FROM: Monammad Nozari	
(Circle applicable section be	low)
Air Division	
-Compliance	-Enforcement/Analysis
-Monitoring/Toxics	-Permitting
SPECIAL INSTRUCTIONS:	





Dest Available Co	ppy (1)				
INSPECTION REPOR					
ENVIRONMENTAL PROTECTION COMMISSI FACILITY: Air Brake Specialists, Inc.		GE I OF I			
FACILITY ADDRESS: 1609 N. 31st Street		: Tampa			
TACIDAT ADDICES. 1009 M. 31 Succe		HONE: (813) 247-5030			
MAILING ADDRESS: Same CIT	Y: Tampa	FLA ZIP: 33605			
T I I I I I I I I I I I I I I I I I I I	SPECTION TYP				
September 24, 2002 9:00 AM 11: AM	Annual	In Compliance			
NEDS NUMBER: 0571057					
SOURCE DESCRIPTION: asbestos Brakes Lining					
CONTACT (S): Edward or Daryl Zwak					
CONTACT (S): Edward or Daryl Zwak Alain Watson and I visited Air Break Specialists for their annual inspection. This inspection was the follow-up to the inspection that Allanna Lynn and I performed on July 23, 2002. We met with Mr. Zwak and he explained that they purchased new de-lining equipment. The difference between the old de-lining machine and the new was that the old machine stripped the liner from the base and caused dust and particles to spread round. The new machine has four (4) punches that remove the rivets from the break liner. The liner is kept intact and does not produce dust and particles. The liners were put in double heavy-duty bags for proper disposal. Mr. Zwak also said that the liners they use do not have any asbestos mixed in them. Because of these changes Mr. Zwak said his facility is exempt from permitting and he is no longer required to have an Air General Operation permit. We told Mr. Zwak he must put his request in writing and submit it to EPC. Note: I agreed with Mr. Zwak that his facility is exempt from permitting but he must properly double bag the used liners and put tag on the bags as possible hazardous waste and put them in a container for proper disposal. Note: I have not informed Mr. Zwak that his facility is exempt from permitting. In the near future I will discuss this matter with Mr. Watson and Mr. Shelton for final decision to inform him or hot.					
INSPECTED BY:		DATE:			
Mohammad Nozari		September 24, 2002			
<u> </u>			Ŕ		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E. ATLANTA, GEORGIA 30365

4APT-AEB

Ms. Chun-chi S. Liu
Environmental Program Manager
Mecklenburg County Department of
Environmental Protection
700 N. Tryon Street
Suite 205
Charlotte, NC 28202-2236

Dear Ms. Liu:

This is in response to your November 18, 1994, letter requesting an applicability determination of the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) pertaining to the 40 CFR, §61.147, "Standard for Fabricating."

Specifically, your letter stated the following situation:
"A brake shoe and clutch plate relining facility removes worn
friction products that may or may not contain asbestos and
replaces them with new friction products that do not contain
asbestos. The worn friction products are removed as whole pieces
by deriveting and no friction product damage occurs."

In follow-up to the above situation, you requested an applicability determination to the following questions. "Is the above process considered a fabricating operation? What constitutes using commercial asbestos?"

Fabricating is defined in 40 CFR, §61.141, "Definitions", as any processing (e.g., cutting, sawing, drilling) of a manufactured product that contains commercial asbestos, with the exception of processing at temporary sites (field fabricating) for the construction or restoration of facilities. In the case of friction products, fabricating includes bonding, debonding, grinding, sawing, drilling, or other similar operations performed as part of fabricating. Commercial asbestos is defined as any material containing asbestos that is extracted from ore and has value because of its asbestos content.

Since the brake shoes and clutch plates are riveted to the metal shoes and clutch plates, and are removed as whole pieces by cutting-out the rivets with no damage to the friction product, this operation is not subject to §61.147. My staff discussed this matter with Jens Schoenfuss of your staff several weeks ago. Although this facility is not subject to §61.147, we would recommend that the facility dispose of the old brake shoes and

clutch plates as they have in the past at an approved asbestos landfill.

Should you have any questions, please contact John Hund of may staff at (404) 347-3555, voice mail extension 4173.

Sincerely yours,

virston A.

Air, Pesticides and Toxics

√ Management Division

Best Available Copy

Administrative Offices, Lugal & Water Management Division The Roger P. Stewart Environmental Center 1900 - 9th Ave. - Tampa, FL 13605 Ph. (813) 272-5960 - Fax (813) 272-5157

Air Management Fax 272-3605
Waste Management Fax 276-1256
Wetlanda Management Fax 272-7144
1410 N. 21st Street - Tampa, FL 23605

ENVIRONMENTAL PROTECTION COMMISSION of Hillsborough County

FAX Transmittal Sheet

DATE: Oct 1, 20	<u>02</u>			
TO: Rich Buller, FDED, BAMMS				
FAX Phone:	Voice Phone:			
;				
TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE: 2				
EPC FAX Transmission Line: (813) 272-5605 For retransmission or any FAX problems, call: (813) 272-5530 ext-1298				
FROM: ALAIN WAT	≈N			
(Circle applicable section below)				
Air Divisi	on			
-Complianc	e -Enforcement/Analysis			
-Monitorin	g/Toxics -Permitting			
to the facility.	: Please copy EFC on your response			

Best Available Copy

Air Brake Specialists 1609 31st St. N. Tampa, Fl. 33605

8/12/02

Mohammad Nozari

Environmental Protection Commission of Hillsborough County

1410 N. 21st Street

Tampa, Fl. 33605

Reference: Title 5 air permit

RECEIVED

EPC of HO
AIR MANAGEMENT

Dear Sir,

This letter is being written to encourage the EPC to exempt Air Brake Specialists (ABS) from Title 5 air permit.

As witnessed by Mr. Nozari and Ms. Lynn, ABS has removed the de-liner known as the "Chopper" (equipment responsible for braking friction material). We are now and will continue to wash and then derivet brake shoes. The friction material is clean and intact. We believe this will exempt us from Title 5.

We would appreciate a letter stating your approval, comments and recommendations concerning my proposal of exemption from Title 5.

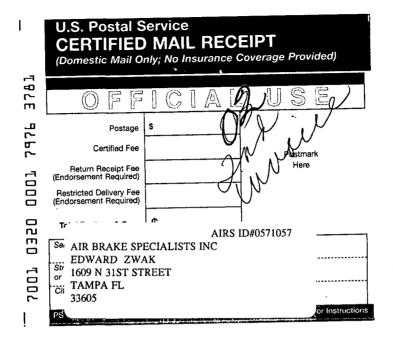
Our permit number is 0571057. If I could be of further assistance please feel free to call at 813-247-5030.

Very truly yours, Air Brake Specialists

Edward Zwak

EZ:ams

ce: Allanna S. Lynn Eric Peterson Gerald Kissell



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
 ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 1 Article Addressed to: AIRS ID#0571057 AIR BRAKE SPECIALISTS INC EDWARD ZWAK 1609 N 31ST STREET TAMPA FL 33605 	A. Signature X	
	3. Service Type Certified Mail Registered Insured Mail C.O.D.	
	4. Restricted Delivery? (Extra Fee)	
2 Article Number (Transfer from service label) 7001 0320	0001:7976;3781:1111	

UNITED STATES POSTAL SERVICE First-Class Mail Postage & Fees Paid USPS Permit No. G-10 BUR. OF AIR MONITORING & MOBILE SOURCES OF AIR MONITORING & MOBILE SOURCE OF AIR MONITORING & MODILE SOUR • Sender: Please print your name, address, and ZIP+4 in this box

Tulliold of the Ideal of the Id

C 1



THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

425182 MAR 72893

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

TOTAL AMOUNT DUE: \$50.00

Do NOT Remove Label

AIRS ID#0571057

AIR BRAKE SPECIALISTS INC EDWARD ZWAK 1609 N 31ST STREET TAMPA FL 33605

FOR GOVERNMENT USE ONLY Org.: 37550101000 E.O: Al Fund: 20-2-03500170 Obj.: 002273