



Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
One North University Drive, Suite 203, Plantation, Florida 33324
954-519-1260 • FAX 954-519-1495

NOTICE OF AIR PERMIT

Mr. Greg Oswald, Operations Manager
Steel Fabricators, LLC.
721 NE 44th Street
Fort Lauderdale, FL 33334

Dear Mr. Oswald:

Enclosed is operation permit Number 0112127-005-AF to operate an air pollution source issued pursuant to Section 403.087 of the Florida Statutes, Broward County's Specific Operating Agreement with the Florida Department of Environmental Protection, and Broward County Code Chapter 27 Article IV which adopts Florida Administrative Code (FAC) 62-4, 62-296 and 62-297.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 62-103 and 28-5.201, FAC, and must be filed (received) in the in the Office of the Broward County Attorney at 115 South Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872 within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes and Chapter 27. This permit is final and effective on the date filed with the Clerk of the PPRAQD unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, FAC. Upon timely filing of a petition or a request for an extension of time, this permit will not be effective until further Order of the PPRAQD. When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, in the Office of the Broward County Attorney at 115 South Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872 and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Broward County, Florida
POLLUTION PREVENTION, REMEDIATION AND
AIR QUALITY DIVISION

A handwritten signature in blue ink, appearing to read "Daniela Banu".

Daniela Banu, Air Quality Administrator



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NOTICE OF AIR POLLUTION PERMIT

ISSUED TO:

PERMITTEE:

Steel Fabricators, LLC.
Authorized Representative:
 Mr. Greg Oswald, Operations Manager
 721 NE 44th Street
 Fort Lauderdale, FL 33334

AIRS ID NO: 0112127
Permit Number: 0112127-005-AF
Issue Date: June 11, 2012
Expiration Date: June 11, 2017

Project Description: Air operating permit for surface coating of miscellaneous metal parts for the communications industry subject to Reasonable Available Control Technology, Rule 62-296.513, Florida Administrative Code.

SIC Code: 3441 – Fabricated Metal Products, Except Machinery and Transportation Equipment
Location: 721 NE 44th Street, Fort Lauderdale, Broward County, Florida
Lat/Long: 26°12'07" N / 80°11'04" W
UTM: Zone 17; 585.9 E; 2889.1 N

Statement of Basis: This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Rules 62-4 and 62-210 through 62-297 (permitting requirements) and Broward County Code, Chapter 27 (emission limitations) and in conformance with all existing regulations of the Florida Department of Environmental Protection (FDEP). The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Broward County Pollution Prevention, Remediation and Air Quality Division (PPRAQD) and made a part hereof.

In accordance with: Application to Construct Air Pollution Source received February 6, 1991, additional information received March 6, 1991, Public Notice of Intent Issued March 26, 1991 and published in the Fort Lauderdale News/Sun Sentinel on April 4, 1991; Certificate of Completion of Construction received November 14, 1991; Application for State Air Federally Enforceable State Operation Permit received May 14, 1996; Application for State Air Federally Enforceable State Operation Permit Renewal received October 2, 2001, additional information received January 25, 2002; Notice of Intent to Issue Permit issued February 22, 2002 and Published in the Sun-Sentinel newspaper on March 3, 2002, Proof of Publication received March 5, 2002; Application for State Air Federally Enforceable Operation Permit Renewal received March 9, 2007, additional information received April 17, 2007; Application for State Air Federally Enforceable State Operation Permit Renewal received December 3, 2011, and additional information received March 5, 2012, and March 26, 2012 (none are attached).

Executed in Broward County, Florida

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

1. FACILITY DESCRIPTION

The facility engages in fabrication and coating of structural steel. The facility includes a sandblasting unit, welding operation, grinding machine and surfacing machines which do not exhaust to the outside. The facility also includes a dust collector which is located outside the building but is considered an insignificant emission source as per construction permit. Appendix A includes a listing of equipment utilized at the facility.

The facility consists of the following emissions units:

<u>Emission Unit ID Number</u>	<u>Description of Emission Unit</u>
001	Structural steel product manufacturing and coating line

2. GENERAL CONDITIONS

1. Terms of Permit. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The Permittee is placed on notice that the PPRAQD will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rule 62-4.160(1), F.A.C.]
2. Permit Validity. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the PPRAQD.
[Rule 62-4.160(2), F.A.C.]
3. Disclaimer. As provided in subsections 403.987(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, or any violations of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other permit that may be required for other aspects of the total project which are not addressed in this permit.
[Rule 62-4.160(3), F.A.C.]
4. Disclaimer. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interest have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rule 62-4.160(4), F.A.C.]
5. Liability. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and FDEP rule, unless specifically authorized by an order from the PPRAQD.
[Rule 62-4.160(5), F.A.C.]
6. Operation and Maintenance. The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by county and state rules. This provision included the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by PPRAQD and FDEP rules.
[Rule 62-4.160(6), F.A.C.]

7. Onsite Inspection Activities. The Permittee, by accepting this permit, specifically agrees to allow authorized PPRAQD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times (depending on the nature of the concern being investigated), access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or PPRAQD and FDEP rules.[Rule 62-4.160(7), F.A.C.]
8. Notice of Noncompliance. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide PPRAQD with the following information:
 - (a) A description of and cause of noncompliance; and
 - (b) The period of noncompliance, including dates and times, or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by PPRAQD for penalties or for revocation of this permit.[Rule 62-4.160(8), F.A.C.]
9. The Permittee shall report noncompliance and/or plant operation problems immediately by phone at 954-519-1499 or by Email at EPDHOTLINE@broward.org. This also applies when the period of non-compliance is first determined after normal business hours or on weekends and holidays.
[Rules 62-4.070(3), F.A.C.]
10. Evidence Materials. By accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted facility or activity, that are submitted to the PPRAQD, may be used by the PPRAQD as evidence in any enforcement proceeding arising under the Florida Statutes or F.A.C. rules, except where such use is prohibited by Section 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
[Rule 62-4.160(9), F.A.C.]
11. Rule Changes. The Permittee agrees to comply with changes in FDEP and Florida Statutes, after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or FDEP rules.
[Rule 62-4.160(10), F.A.C.]
12. Permit Transfer. This permit is transferable only upon PPRAQD approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the PPRAQD.
[Rule 62-4.160(11), F.A.C.]
13. Permit Transfer Procedures. Within 30 days after the sale or legal transfer of a permitted facility, an "Application for Transfer of Air Permit" - DEP Form 62-210.900(7), (and associated fee), must be submitted to the PPRAQD. This form must be completed with the notarized signatures of both the Permittee and the proposed new Permittee.
[Rule 62-4.120(1), F.A.C.]
14. Work Site Copy. This permit or a copy thereof shall be kept at the work site of the permitted activity.
[Rule 62-4.160(12), F.A.C.]
15. Miscellaneous Compliance Requirements. The Permittee shall comply with the following:

- (a) Upon request, the Permittee shall furnish all records and plans required under FDEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the PPRAQD.
- (b) The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recording for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by PPRAQD rule.
- (c) Records of monitoring information shall include:
 1. The date, exact place, and time of sampling or measurements;
 2. The person responsible for performing the sampling or measurements;
 3. The dates analyses were performed.
 4. The person responsible for performing the analyses;
 5. The analytical techniques or methods used;
 6. The results of such analyses.

[Rule 62-4.160(14), F.A.C.]

16. Information Submittal. When requested by the PPRAQD, the Permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the PPRAQD, such facts or information shall be corrected promptly.
[Rule 62-4.160(15), F.A.C.]
17. Florida Statutes. The issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, Florida Statutes, FDEP, and PPRAQD rules.
[Rule 62-4.070(3), F.A.C. and Rule 62-4.070(7), F.A.C.]
18. Rules Adoption. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, as amended, are adopted by Broward County Code, Sec. 27-173.
[Broward County Code, Sec. 27-173]

3. FACILITY-WIDE CONDITIONS

19. General Prohibition. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, constructed, expanded, or modified without the appropriate and valid permits issued by the PPRAQD, unless the source is exempted by FDEP rule. The PPRAQD may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, Florida Statutes, or the rules promulgated there-under. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.
[Rule 62-4.030, F.A.C.]
20. Administrative Corrections. The facility owner shall notify the PPRAQD in writing of minor corrections or amendments to information contained in this permit. Such minor corrections or amendments shall include:
 - (a) Typographical errors noted in the permit;
 - (b) Name, address or phone number change from that in the permit;
 - (c) A change requiring more frequent monitoring or reporting by the Permittee;
 - (d) A change in ownership or operational control of a facility;
 - (e) & (f) Reserved.
 - (g) Any other similar minor administrative change at the source.
[Rule 62-210.360, F.A.C.]

21. Concealment. No person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which would otherwise constitute a violation of any provisions of Broward County Codes.
[Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(b)]
22. Circumvention. No person shall circumvent any air pollution device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650, F.A.C. and Broward County Code, Sec. 27-175(c)]
23. Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Codes.
[Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(d)]
24. Excess Emissions. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. In case of excess emissions resulting from malfunctions, each owner or operator shall notify the PPRAQD in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the PPRAQD.
[Rule 62-210.700(4), F.A.C. and Rule 62-210.700(6), F.A.C.]
25. Objectionable Odor. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
26. Volatile Organic Compound Emissions or Organic Solvent Emissions. No person shall store, pump, handle, process, load, unload or use in any process or installation volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the PPRAQD.
[Rule 62-296.320(1), F.A.C., Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(f)]
27. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere any air pollutants from sources, the opacity of which is equal to or greater than 20 percent. If the presence of uncombined water is the only reason for failure to meet visible emission standards given in this section, such failure shall not be a violation of this prohibition.
[Rule 62-296.320(4)(b)1, F.A.C. and Broward County Code, Section 27-175(i)]
28. Unconfined Emissions of Particulate Matter. No person shall cause, let, permit, suffer or allow emission of particulate matter from any source whatsoever, including but not limited to vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, storing or handling without taking reasonable precautions to prevent such emissions.
Reasonable precautions may include, but shall not be limited to, the following:
 - a) Paving and maintenance of roads, parking areas and yards.
 - b) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
 - c) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - d) Landscaping or planting of vegetation.
 - e) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
 - f) Enclosure or covering of conveyor systems.
[Rule 62-296.320(4)(c), F.A.C. and Broward County Code Sec. 27-177(b)]
29. Special Compliance Tests. When PPRAQD, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a PPRAQD rule or in a permit issued pursuant to those rules is being violated, it may require

the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the PPRAQD.
[Rule 62-297.310(7)(b), F.A.C.]

30. **Annual Operating Report.** On or before April 1 of each calendar year, the Permittee shall submit either a completed hard copy of FDEP Form 62-210.900(5), Annual Operating Report (AOR) for Air Pollutant Emitting Facility to Broward County, PPRAQD, or submit an electronic AOR to the FDEP. For the AOR, the permittee shall calculate the facility-wide Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) emissions, based on usage records as specified in Specific Condition No. 39.
[Rule 62-210.370(3), F.A.C.]

{Permitting Note: Information regarding electronic AOR submittal may be found at:
<http://www.dep.state.fl.us/air/emission/eaor/default.htm>}

31. **Operating Permit Renewal.** Sixty (60) days before the expiration date of this permit, the Permittee shall apply for a renewal of the permit using the forms incorporated by reference in the specific rule chapter for this type of permit. A renewal application shall be timely and sufficient. If the application is submitted prior to the days specified above before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the PPRAQD or, if there is court review of the PPRAQD's final agency action, until a later date is required by Section 120.60, Florida Statutes.
[Rule 62-4.090, F.A.C.]

{Permitting Note: The Permittee may also elect to submit the application electronically using the Electronic Permit Submittal and Processing System (EPSAP) located at: <http://www.dep.state.fl.us/air/emission/epsap/default.htm>, along with the processing fee established in Rule 62-4.050(4), F.A.C.}

4. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. This section addresses the following emissions units.

<u>Emission Unit ID Number</u>	<u>Description of Emission Unit</u>
001	Structural steel product manufacturing and coating line

Emission Limiting Standards

32. **Solvent and Coating Usage.** No owner or operator of a coating line for miscellaneous metal parts and products shall cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds per gallon of coating (0.42 kilograms per liter), excluding water, delivered to a coating applicator that is air dried or forced warm air dried at room temperature up to 194 degrees Fahrenheit (90 degrees Celsius).
[Rule 62-296.513(2)(a)2, F.A.C.]
33. **Solvent Washings.** All volatile organic compound emissions from solvent washing shall be considered in the emission limitations, unless the solvent is directed into containers that prevent evaporation into the atmosphere.
[Rule 62-296.513(2)(c), F.A.C.]
34. **Product Usage Limitation.** In order to avoid major source (Title V) applicable standards, the usage rate of coatings and solvents shall not exceed 25,000 gallons in any consecutive twelve-month period.
[Rule 62-4.070(3), F.A.C. and Rule 62-213.420(3)(c)1, F.A.C.]

Test Methods and Procedures

35. Compliance Test Method. The applicable test method to demonstrate compliance with Specific Condition No. 32 for VOCs shall be EPA Method 24 or EPA 450/3-84-019, incorporated and adopted by reference in Chapter 62-297, F.A.C.
[Rule 62-296.513(4)(a), F.A.C.]
36. Alternate Test Method. The Department may accept, instead of the coating analysis methods, a certification by the coating manufacturer of the composition of the coating if it is supported by actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings."
[Rule 62-296.500(2)(b)4, F.A.C.]

Notifications, Recordkeeping and Reporting Requirements

37. Compliance Test Frequency. The compliance test referenced in Specific Condition No. 35 shall be performed prior to obtaining a renewed operation permit or whenever a new type/brand of coating is used.
[Rule 62-297.310(7)(a)3, F.A.C. and Rule 62-4.070(3), F.A.C.]
38. General Recordkeeping. The owner or operator shall maintain daily records of operations for the most recent two year period. The records shall be made available to the local, state, or federal air pollution agency upon request. The records shall include, but not be limited to, the following:
- a. The rule number applicable to the operation for which the records are being maintained.
 - b. The application method and substrate type (e.g. metal).
 - c. The amount and type of coatings, solvent used at each point of application, including exempt compounds.
 - d. The VOC content as applied in each coatings and solvent.
 - e. The date for each application of coating and solvent.
 - f. The amount of surface coating preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each.
 - g. Oven temperature.
- [F.A.C. Rule 62-296.500(2)(b)]
39. Product Usage Recordkeeping. The permittee shall maintain monthly records of total VOC and HAP(s) emissions, including all coatings and solvents used during production on a twelve-month rolling basis.
[Rule 62-4.070(3), F.A.C.]
40. Product Changes. The Permittee shall notify PPRAQD of any change in products and submit new material safety data sheets (MSDS) for approval prior to use.
[Rule 62-4.070(3), F.A.C.]

Appendix A

EMISSION POINT ID	DESCRIPTION
001	DESCALING UNIT
002	PAINT PUMPS AND SPRAY GUNS
003	PAINT GUN CLEANING
004	PAINT STORAGE
005	SOLVENT RECOVERY
006	SAND BLASTING UNIT
007	COLD SAW
008	PUNCH & BEAM LINE - 5 STAND
010	SHEARS (3)
011	PORTABLE DRILLS
012	PORTABLE PUNCH (2)
013	IRON WORKERS (2)
014	HAND BURNING TORCHES
015	MACHINE BURNING TORCHES
016	MANUAL WELDING
017	AUTOMATIC WELDING
018	GRINDING MACHINES (MANUAL)
019	SURFACING MACHINES
020	LATHE
021	END MILL
022	PARTS WASHER (VOLTEC RED-II)
023	MISCELLANEOUS HAND TOOLS
024	FUGITIVES
025	BLUE PRINT
026	BAND SAWS (3)