



Environmental Protection and Growth Management Department
ENVIRONMENTAL ENGINEERING AND PERMITTING DIVISION
1 North University Drive, Mailbox 201, Plantation, Florida 33324
954-519-1483 • FAX 954-519-1495

PERMITTEE

Stimpson Company, Inc.
1515 S.W. 13th Court
Pompano Beach, Florida 33069
Authorized Representative: Scott Thomas, President

Air Permit No. 0112183-006-AC
Permit Expires: December 6, 2017
Air Construction Permit

PROJECT

This is the final air construction permit to modify and renew the air operating permit 0112183-005-AO to permit 0112183-007-AO. The requested modifications includes replacement of the coatings ACME Hardesty, Metalguard 510, Acrylic Gloss Paint, Black Urethane Lacquer and Alkaline Deruster with coatings Metalguard 27, Rust Slayer ALK 2L and Renoclean 9009 which are volatile organic compound (VOC) and hazardous air pollutant (HAP) free. In addition, two identical Clever Brooks oil-fired 2.5 MMBTU/hr. boilers were replaced with one ISC/FB-A50 Fulton 1.674 MMBTU/hr. natural gas-fired steam boiler and one ISC/FB-A30 Fulton 1.005 MMBTU/hr. natural gas-fired steam boiler. These new boilers are conditionally exempt from permitting as they are fueled by natural gas and collectively, the total rated heat input is less than 10 MMBtu/hr. The grinding and polishing operation will be reclassified from regulated to unregulated emissions source resulting in changes to the applicable requirements. The facility fabricates and surface coats miscellaneous metal parts for the communication industry. It is located at 1515 Southwest 13th Court, Pompano Beach, Broward County, Florida. It is categorized under Standard Industrial Classification (SIC) No. 3452 and North American Industry Classification Standard (NAICS) Code 332722 is The UTM coordinates are Zone 17, 585 km East and 2899.50 km North. **Lat/Long:** 26°12'49" N / 80°03'31"

This construction permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Facility-Wide Conditions), Section 4 (Emissions Unit Specific Conditions); and Section 5 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 5 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C., but is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Office of the Broward County Attorney at 115 S. Andrews Avenue, Room: 423, Fort Lauderdale, Florida 33301-1872 (Telephone: 954-357-7600, Fax: 954-357-7641 and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the EEPD.

Executed in Plantation, Florida

Robert C. Wong
Environmental Program Supervisor

SECTION 1. GENERAL INFORMATION (FINAL)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Scott Thomas, Stimpson Company, Inc., scott_thomas@stimpson.com

Mr. Michael Spievack, P.E., Langan Engineering and Environmental Services, mspievack@langan.com

Ms. Diane Pupa, Permitting Program Administrator, Florida Department of Environmental Protection /Southeast District, diane.pupa@dep.state.fl.us.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date,
pursuant to Section 120.52(7), Florida Statutes, with the
designated agency clerk, receipt of which is hereby
acknowledged.

Clerk

Date

FACILITY DESCRIPTION

Stimpson Company, Inc. fabricates miscellaneous metal parts such as grommets, eyelets, hole plugs, ring snaps, washers, clamps and vents for the communication industry. The fabrication process consists of polishing, grinding, coating, enameling and drying operations. Volatile organic compounds (VOCs), hazardous air pollutants (HAPs) and particulate matter (PM) emissions are emitted during the process. VOC and HAP emissions are controlled by good housekeeping practices; and using coatings with VOC content not exceeding 3.5 lbs of VOC/gallon of coating. Particulate matter (PM) emissions are controlled by a dust collector that exhausts to the atmosphere. The facility also coats the metals parts with rust inhibitors, weak acids, and metal guards for durability and to extend the life of the parts.

There are four propane-fired drying ovens, associated with coating and enameling operation, to dry the metal parts. These ovens are considered insignificant emission sources, per Rule 62-210.300(3) (a) 34e, F.A.C.

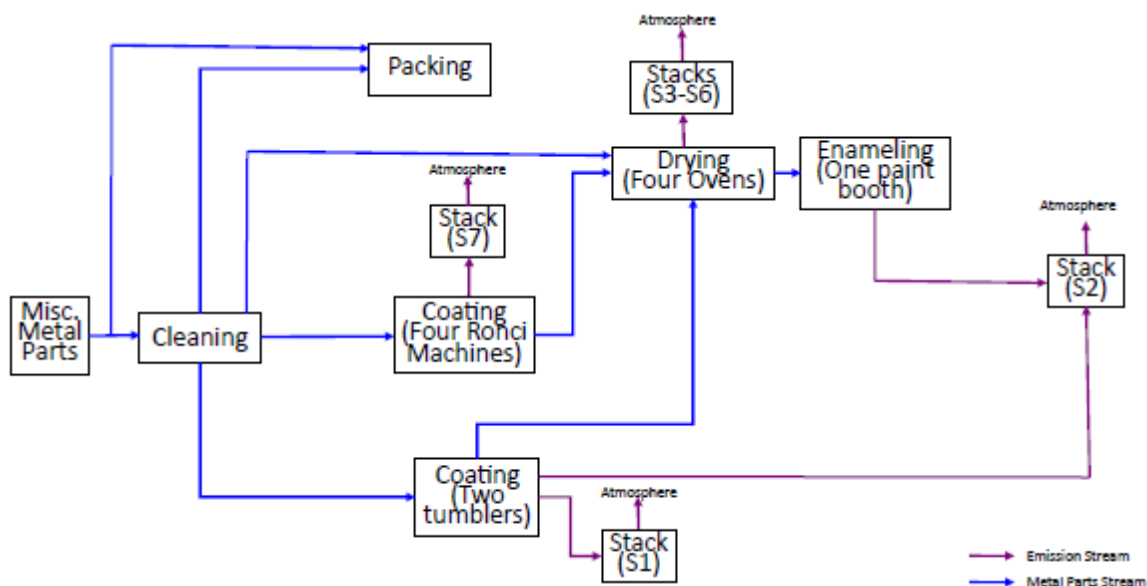
There is one new ISC/FB-A50 Fulton 1.67 MMBtu/hr natural gas-fired boiler and one new ISC/FB-A30 Fulton 1.005 MMBTU/hr natural gas-fired boiler.

The grinding and polishing operation is classified as unregulated emissions source because it is not subject to any unit-specific limitation and/or requirement required by rule. Particulate matter emissions are negligible and controlled by a Torit 124-20-5 dust collector.

The operation encompasses one regulated emissions unit, at the present time.

The process flow diagram, illustrated below, represents the regulated emissions unit.

EMISSIONS UNIT 001 – Coating, Enameling and Drying Operations



SECTION 1. GENERAL INFORMATION (FINAL)

The existing facility consists of the following emissions unit.

Facility ID No. 0112183	
ID No.	Emission Unit Description
001	Coating, enameling and drying operations in the metal fabrication process.

Permitting Note: There is one ISC/FB-A50 Fulton 1.67 MMBtu/hr natural gas-fired boiler and one ISC/FB-A30 Fulton 1.005 MMBTU/hr natural gas-fired boiler. Per Rule 62-210.300(3) (a) 33 F.A.C., the natural gas-fired boilers are not subject to any unit-specific limitation or requirement, and collectively, the total rated heat input is less than 10 MMBTU/hr, therefore, they are conditionally exempt emission sources. The facility is not subject to the federal regulations in 40 CFR 63 Subpart M National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. While the facility coats miscellaneous metal parts, it is not subject to this subpart as it is not a major source of hazardous air pollutants, per 40 CFR 63.3881(b). There are four propane-fired drying ovens, associated with coating and enameling operation, to dry the metal parts that are considered insignificant emission sources, per Rule 62-210.300(3)(a)34e, F.A.C. The grinding and polishing operation is classified as unregulated emissions source because it is not subject to any unit-specific limitation and/or requirement required by rule. Particulate matter emissions are negligible and controlled by a Torit 124-20-5 dust collector with a capture efficiency of 90%.

PROPOSED PROJECT

The purpose of the project is to obtain a construction permit to modify and renew the air operating permit 011183-005-AO. The permit expired on May 8, 2017 and the construction/renewal application was received on March 17, 2017. The requested modifications are:

- Replacement of coatings ACME Hardesty, Metalguard 510, Acrylic Gloss Paint, Black Urethane Lacquer and Alkaline Deruster with the following VOC and HAP free coatings, Metalguard 270, metal surface protectant, and Rust Slayer ALK 2L. They will also use Renoclean 9009, as a cleaning agent that is also VOC and HAP free and a non-halogenated product. All solvent/coating/acid/solution products volatility content were verified in the safety data sheets (SDS). All products met the VOC RACT permit limitation of 3.5 lb of voc/gal of coating. The four propane-fired drying ovens, associated with coating and enameling operation (eu001), to dry the metal parts are insignificant emission sources. The peak/maximum amount of propane use meets the permit exemption requirements under rule 62-210.300(3) (a) 34e, F.A.C.
- Replacement of two identical clever brooks oil-fired 2.5 MMBtu/hr. Boilers (EU 002) with one isc/fb-a50 fulton 1.674 MMBtu/hr. Natural gas-fired steam boiler and one isc/fb-a30 fulton 1.005 MMBtu/hr. Natural gas-fired steam boiler. These new boilers are exempt from permitting, since they use natural gas and the total collectively rated capacity is less than 10 MMBtu/hr.
- The grinding and polishing operation is presently classified as a regulated emission unit. The grinding and polishing operation is not subject to any unit-specific limitation and/or requirement required by rule. Also, the particulate matter (PM) emissions are negligible as they are controlled by a dust collector with a capture efficiency of 90%. This operation will be reclassified as an unregulated emissions source.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP), 40 CFR 63 Subpart M National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. While the facility coats miscellaneous metal parts, it is not subject to this subpart, as it is not a major source of hazardous air pollutants, per 40 CFR 63.3881(b). The operation is limited to the major source (Title V) thresholds.

SECTION 1. GENERAL INFORMATION (FINAL)

- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a not Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

The table, on the next page, summarizes the applicable federal, state and county air pollution regulations.

SUMMARY OF APPLICABLE REGULATIONS

Summary of Applicable Federal Regulations	Summary of Applicable State of Florida Regulations
N/A	Rule 62-296.320(2) F.A.C. - Objectionable Odor
	Rule 62-296.320(4) (b) F.A.C. - General Visible Emissions Standards -20% opacity facility-wide, per DEP Guidance, DARM-PER- 33 Rule 62-296.320(4)(c) Unconfined Particulate Matter and 62-4.070(3) F.A.C. Rule 62-296.320(1) (a) F.A.C. - VOC or Organic Solvent Emissions
	Rule 62-210-650 F.A.C. Circumvention of air pollution control equipment Rule 62-296.513(2)(a)(3), F.A.C. – Reasonable Available Control Technology (RACT) – Surface Coating of Miscellaneous Metal Parts and Products
Summary of Applicable County Regulations	
Broward County Chapter 27 Air Pollution Control, Article IV, Sec. 27-175(b) & (d)	These regulations refer to: Concealment of emissions (b) and Maintenance (d) Note: Not Federally Enforceable

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Broward County Environmental Engineering and Permitting Division (EEPD). The EEPD mailing address is 1 North University Drive, Mailbox 201, Plantation, Florida 33324, the email address is airlicense@broward.org and EEPD's main telephone number is 954-519-1483.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the EEPD at: 1 North University Drive, Suite 201, Plantation, Florida 33324, or via the email address aircompliance@broward.org.
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.
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 regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the EEPD may require the permittee to conform to new or additional conditions. The EEPD shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the EEPD may grant additional time. [Rule 62-4.080, F.A.C.]
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 EEPD. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1) (a), F.A.C.]
7. Construction and Expiration. The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to EEPD in writing before the permit expires. [Rules 62-4.070(4), 62-4.080 & 62-210.300(1), F.A.C.]
8. Annual Operating Report (AOR). The AOR shall be submitted to the EEPD by April 1 of the following year. If the report is submitted using FDEP's electronic annual operating report software (EAOR), there is no requirement to submit a copy to EPPD. [Rule 62-210.370(3) (c), F.A.C.]

{Permitting Note. Information on the EAOR submittal is available at <http://www.dep.state.fl.us/air/emission/eaor/default.htm>}
9. Operating Permit. Sixty days before the expiration date of this construction permit, the permittee shall apply for an operation permit using the forms incorporated by reference in the specific rule chapter for this type of permit. [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) via the <http://www.dep.state.fl.us/air/emission/epsap/default.htm> website, along with the processing fee established in Rule 62-4.050(4), F.A.C. , [62-4.090(1) and 62-4.050(4), F.A.C.]

SECTION 3. FACILITY-WIDE CONDITIONS (FINAL)

1. **Not Federally Enforceable. 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. and Broward County Code, Sec. 27-175(e)]
2. **VOC or Organic Solvents Emissions.** The owner or operator shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the EPPD. Displaced vapors generated during the loading of gasoline and denatured ethanol products shall be vented to a vapor control system.
[Rule 62-296.320(1), F.A.C.]
3. **General Visible Emissions.** No person shall cause, let, permit, suffer or allow to be discharged into the outdoor atmosphere any air pollutants from sources, the opacity of which is equal or greater than 20 percent. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4) (b), F.A.C.]
4. **General Prohibition and Concealment.** Any stationary installation which will reasonably be expected to be a source of pollution shall obtain an appropriate and valid permit, unless exempted by rule. Furthermore, 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 applicable provisions.
[Rule 62-3.030 FAC and Broward County Code, Sec. 27-175(b)]
5. **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)]
6. **Maintenance.** No person shall operate any air pollution control equipment or systems without proper maintenance to assure compliance with applicable emission limits.
[Rule 62-210.300 (2) (a) 2, F.A.C. and Broward County Code, Sec. 27-175(a)]
7. **Special Compliance Tests.** When EEPD, 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 EEPD 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 EEPD.
[Rule 62-297.310(7) (b), F.A.C.]
8. **Facility Operating Schedule.** The maximum operating schedule for the facility is 16 hours/day, 5 days/week, 52 weeks/year.
[Rule 62-4.070(3), F.A.C. and Construction Permit received March 2, 1995]

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. 001

This section of the permit addresses the following emissions unit:

EU No.	Emission Unit Description
001	Coating, enameling and drying operations in the metal fabrication process.

EMISSIONS STANDARDS

1. Facility Wide VOC, Total HAP and Individual HAP Emissions. In order to avoid major source (Title V) applicable requirements, the volatile organic compounds (VOC) emissions shall be less than 100 tons/year, the individual hazardous air pollutants (HAP) emissions shall be less than 10 tons/year and the total HAP emissions shall be less than 25 tons/year 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., construction permit application received March 17, 2017 and additional information received June 19, 2017]
2. 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 applies extreme performance coatings.
[Rule 62-296.513(2) (a) 3, F.A.C.]
3. 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.]

RECORDKEEPING REQUIREMENTS

4. The permittee shall keep records of any change in products, and material safety data sheets (MSDS). These records shall be made available, for review, by EEPD staff.
[Rule 62-4.070(3), F.A.C.]
5. The permittee shall maintain monthly records of total VOC and HAP emissions, including all coatings and solvents used during operation on a twelve-month rolling basis. This information is required to prepare the AOR.
[Rule 62-4.070(3). F.A.C.]
6. 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. Ovens temperature.
[Rule 62-296.500(2) (b), F.A.C.]

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. 001

COMPLIANCE TEST METHOD

7. Low Solvent Technology. The test method for volatile organic compounds shall be EPA Method 24, as described in 40 C.F.R. Part 60, Appendix A-7, adopted and incorporated by reference in Rule 62-204.800, F.A.C., or EPA 450/3-84-019, Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings (<http://www.flrules.org/Gateway/reference.asp?No=Ref-04298>), hereby adopted and incorporated by reference.
[Rule 62-296.513(4) (a), F.A.C.] This test method refers to the EPA VOC Data Sheet Form, as applied.
8. The EEPD may accept, instead of the coating analysis method, referenced in Specific Condition #7 of this permit, 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.]
9. The compliance test referenced in Specific Condition #7 shall be performed whenever a new type or brand of coating is used.
[Rule 62-4.070(3), F.A.C.]