



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 FINAL AIR PERMIT

Sent by Certified Mail – Return Receipt Requested

Ms. Ivelisse Gaud, EH & S Manager
PAS Technologies
10301 No. Commerce Parkway
Miramar, Florida 33025

Air Permit No. 0112704-002-AF
PAS Technologies
FESOP
Chromium, nickel, cadmium and silver
electroplating and anodizing of metal
parts for the aerospace industry.
Broward County, Florida.

Dear Ms. Gaud:

Enclosed is the final air federally enforceable state operation permit, which authorizes PAS Technologies to operate a chromium, nickel, cadmium and silver electroplating and anodizing of metal parts facility for the aerospace industry. The facility is located in Broward County at 10301 No. Commerce Parkway, Miramar, Florida. This final permit is issued pursuant to Chapter 403, Florida Statutes.

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 Pollution Prevention, Remediation and Air Quality Division (PPRAQ), One North University Drive, Suite: 203, Plantation, Florida 33324 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 PPRAQ.

Executed in Plantation, Florida.

A handwritten signature in cursive script, appearing to read "Daniela Banu".

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

NOTICE OF FINAL AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail or regular mail with received receipt requested before the close of business on 7/15/10 to the persons listed below.

Dexter Dawson, PAS Technologies, dexter_dawson@pas-technologies.com

Stephanie Brooks, P.E., Brooks and Associates, brookseng@aol.com

Lennon Anderson, P.E., SFDEP, Air Section, (Lennon.anderson@dep.state.fl.us)

Clerk Stamp

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



(Clerk)

7/15/10

(Date)



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ISSUED TO:

PERMITTEE:

Ms. Ivelisse Gaud
EH & S Manager
PAS Technologies
10301 No. Commerce Parkway
Miramar, Florida 33025

AIRS ID NO: 0112704

Permit Number: 0112704-002-AF *

Issue Date: July 15, 2010

Expiration Date: March 26, 2013

County: Broward

Project: Federally Enforceable State Operation Permit (FESOP) to include the applicable requirements of NSPS – 40 CFR 60, Subpart Dc Standards of Performance of Small Industrial – Commercial – Institutional Steam Generating. The specific conditions and the expiration date of the 0112704-001-AF issued February 5, 2009 will remain unchanged.

Lat/Long: 25°59'2.039"N/80°16'53"W

UTM: 17; 571.91 Km. E; 2874.02 Km. N

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) Florida Administrative Code (F.A.C.) Rules 62-4 and 62-204 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 (DEP). 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 (PPRAQ) and made a part hereof and specifically described as follows:

Operate: An air pollution source consisting of chromium, nickel, cadmium and silver electroplating and anodizing of metal parts for the aerospace industry. The emission units are as follows:

EU #001: A plating line for cadmium and silver electroplating. Air emissions are controlled with an 8,000 CFM composite mesh pad wet scrubber.

EU #002: Nickel plating line. Air emissions are controlled with a 28,000 CFM composite mesh pad wet scrubber.

EU #003: Chromium plating line. Air emissions are controlled with a 9,566 CFM composite mesh pad wet scrubber.

EU #005: A 33.5 MMBTU/hr Yorkshire Shipley natural gas-fired boiler which is used to heat water tanks and solutions by the use of steam lines. This emissions unit is not in contact with any chemicals.

There are two chromium and two nickel plating tanks, one nickel strip and one silver strip tank, one cadmium rinse tank and one chromium neutralizing tank. There are heated tanks and are unregulated/insignificant emissions units.

Broward County Board of County Commissioners

Sue Gunzburger • Kristin D. Jacobs • Albert C. Jones • Ken Keechl • Ilene Lieberman • Stacy Ritter • John E. Rodstrom, Jr. • Diana Wasserman-Rubin • Lois Wexler
www.broward.org

In accordance with: Application to obtain Federally Enforceable State Operation Permit (FESOP) received electronically December 5, 2007, additional information received July 18, and 24, 2008 and November 14, 2008, Notice of Intent to Issue Permit issued on November 17, 2008 and Public Notice of Intent published on November 28, 2008 in the Broward Daily Business Review Newspaper, second Notice of Intent to Issue Permit, to include applicable requirements, 40 CFR 63, Subpart WWWW, issued on December 22, 2008 and Public Notice of Intent published on January 5, 2009 in the Broward Daily Business Review Newspaper, third Notice of Intent to Issue Permit, to include applicable requirements, 40 CFR 60, Subpart Dc, issued on June 14, 2010 and Public Notice of Intent published on June 29, 2010 in the Broward Daily Business Review Newspaper. (None are attached)

Location: 10301 North Commerce Parkway, Miramar, Broward County, Florida.

To serve: An Electroplating, Plating, Publishing, Anodizing and Coloring Operation (SIC # 3471)

Subject to: General Conditions 1-16, Facility-Wide Conditions 17-21, and Specific Conditions 22-39.

Attachment part of this permit: Attachment A, Attachment B

Permitting Note:

This facility may be subject to the new area source MACT, 40 CFR 63 – Subpart WWWW, which has not been adopted by Florida DEP, and which is only federally enforceable at this time. The link to the rule is <http://www.epa.gov/ttn/atw/area/fr01jy08.pdf>

This facility is also subject to the NSPS, 40 CFR 60 – Subpart Dc, Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units. The permit 0112704-001-AF issued February 5, 2009 includes the opacity requirements under F.A.C. Rule 62-296.406(1).

* Permit revision of 0112704-001-AF

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, F.S. The Permittee is placed on notice that the PPRAQ 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 PPRAQ.
[Rules 62-4.160 (2), F.A.C.]
3. Disclaimer. As provided in subsections 403.087(6) and 403.722(5), F.S., 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.
[Rules 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.
[Rules 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 DEP rule, unless specifically authorized by an order from the PPRAQ.
[Rules 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 PPRAQ and DEP rules.
[Rules 62-4.160 (6), F.A.C.]
7. Onsite Inspection Activities. The Permittee, by accepting this permit, specifically agrees to allow authorized PPRAQ 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 PPRAQ and DEP rules.
[Rules 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 PPRAQ 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 educe, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any enforcement action by PPRAQ for penalties or for revocation of this permit.[Rules 62-4.160 (8), F.A.C.]
9. Reporting Noncompliance. The Permittee shall report any periods of noncompliance to the PPRAQ immediately by phone at 954-519-1499 or by Email at EPDHOTLINE@broward.org. This also applies when the period of noncompliance is first determined after normal business hours or on weekends and holidays.
[Rules 62-4.130 and 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 PPRAQ, may be used by the PPRAQ 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.
[Rules 62-4.160 (9), F.A.C.]
11. Rule Changes. The Permittee agrees to comply with changes in Florida Department of Environmental Protection 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 DEP rules.
[Rules 62-4.160 (10), F.A.C.]
12. Permit Transfer. This permit is transferable only upon PPRAQ 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 approved by the PPRAQ.
[Rules 62-4.160 (11), F.A.C.]
13. Work Site Copy. This permit or a copy thereof shall be kept at the work site of the permitted activity.
[Rules 62-4.160 (12), F.A.C.]
14. Miscellaneous Compliance Requirements. The Permittee shall comply with the following:
 - (a) Upon request, the Permittee shall furnish all records and plans required under DEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the PPRAQ.
 - (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 PPRAQ 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.

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

15. Information Submittal. When requested by the PPRAQ, 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 PPRAQ, such facts or information shall be corrected promptly.

[Rules 62-4.160 (15), F.A.C.]

16. 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]

FACILITY - WIDE CONDITIONS:

17. 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.]

18. 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 PPRAQ. The following requirements are deemed necessary by PPRAQ:

- (a) Tightly covering or closing all VOC containers when they are not in use.
- (b) Tightly covering, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use.
- (c) Immediately confining and cleaning up VOC spills and ensuring that discarded hazardous materials are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1) (a), F.A.C.]

19. 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 Code.

[Broward County Code, Sec. 27-175(b)]

20. 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.

[Broward County Code, Sec. 27-175(c)]

21. Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Code.

[Broward County Code, Sec. 27-175(d)]

SPECIFIC CONDITIONS

Emission Limiting and Work Practice Standards

22. This facility is subject to the area source MACT, 40 CFR 63 – Subpart N – Hard Chromium Electroplating and Anodizing included in Attachment A of this permit.
[40 CFR 63 – Subpart N]
23. This facility is subject to the New Source Performance Standards (NSPS), 40 CFR 60 – Subpart Dc – Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units included in Attachment B of this permit.
[40 CFR 60 – Subpart Dc]
24. Facility Wide VOC, Total HAP and Individual HAP Emissions. In order to avoid major source (Title V) applicable standards, the volatile organic compounds (VOC) emissions shall be less than 7 tons in any consecutive twelve -month period; the chromium and cadmium emissions each shall be less than 1.91 tons in any consecutive twelve-month period; cyanide, hydrochloric acid, hydrogen fluoride emissions each shall be less than 0.96 tons in any consecutive twelve- month period; lead magnesium and mercury emissions each shall be less than 0.10 tons in any consecutive twelve - month period; nickel emissions shall be less than 0.02 tons in any consecutive twelve- month period and the total HAP emissions shall be less than 7 tons in any consecutive twelve- month period.
[Rule 62-4.070(3) F.A.C., Rule 62-213.4220(3)(c) 1, emissions limitation were requested by the applicant on the FESOP application received on December 5, 2007, and additional information received November 14, 2008]
25. Fuel used at the gas-fired boiler shall be limited to natural gas.
[Rule 62-4.070(3) F.A.C.]
26. The composite mesh pad scrubbers shall be visually inspected, to ensure that there is proper drainage, no chemical build up on the pads, and no evidence of chemical attack or leakage. Also, the permittee shall follow the Operations and Maintenance Plan, submitted with the FESOP application and information received on December 5, 2007, and other recommended practices to ensure proper operation of the scrubbers.
[Rule 62-4.070(3) F.A.C.]
27. Visible Emissions: Visible emissions shall not exceed twenty (20) percent opacity except for either one-six minute period per hour during which opacity shall not exceed twenty-seven (27) percent.
[Rule 62-296.406(1), F.A.C.] This provision applies to the boiler and the visible emissions option is specified above, as required by this rule.

Recordkeeping Requirement

28. The permittee shall maintain records of the inspection for the scrubbers and document the maintenance performed. Also, any malfunction shall be documented as outlined in the operations and maintenance plan.
[Rule 62-4.070(3) F.A.C.]
29. The permittee shall keep records of the usage rate of each chemical, specified on Specific Condition No. 24, on a calendar-month basis and shall calculate VOC, individual HAP and total HAP emissions on a consecutive twelve - month rolling period in order to demonstrate compliance with Specific Condition No. 22 and maintain synthetic minor status. All records shall be made available to PPRAQ personnel upon request.

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

30. The permittee shall maintain the records required by this permit for a period of five (5) years from the date the records were created and be made available for PPRAQ staff review, if necessary.
[Rule 62-4.070(3), F.A.C.]
31. The permittee shall notify PPRAQ 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.]
32. The permittee shall keep records of the amount of fuel used in the boiler and the heat content of the fuel on a twelve-consecutive month rolling period basis.
[Rule 62-4.070(3), F.A.C.]

Compliance Testing Requirement

33. Formal compliance tests. During each federal fiscal year (October 1 - September 30), the permittee shall conduct formal compliance tests in accordance with the following:

| <u>Source/Emission Point</u> | <u>Pollutant</u> | <u>Test Method</u> |
|--|-------------------|--------------------|
| EU#005 - Yorkshire Shipley natural gas-fired boiler. | Visible Emissions | EPA Method 9 |

[Rule 62-297.310(7) (a) 4, F.A.C.]

34. Observation Period: The required minimum period of observation for visible emissions testing shall be thirty (30) minutes.
[Rule 62-297.310(4) (a) 2. F.A.C.]
35. Observation Intervals. Visible emission observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
[Rule 62-297.401(9) (c) 1, F.A.C.]

Reporting Requirement


36. Annual Operating Report (AOR). The AOR shall be submitted to the PPRAQ 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 PPRAQ.
[Rule 62-210.370(3), F.A.C.]
{ Permitting Note. Information on the EAOR submittal is available at <http://www.dep.state.fl.us/air/eproducts/eaor/default.htm> }
37. Compliance Testing Notification. The PPRAQ shall be notified of expected test dates at least fifteen (15) days before the date on which the 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 owners.
[Rule 62-297.310(7) (a) 9, F.A.C.]
38. Compliance Test Report Submittals. All required test reports shall be submitted to PPRAQ with copies submitted to FDEP, as soon as practical, but no later than 45 days after the last sampling run of each test is completed.
[Rule 62-297.310(8) (b), F.A.C.]

Renewal Requirements

39. Operating Permit Renewal. Sixty days before the expiration date of this operation permit, the Permittee shall apply for a renewal of permit using the forms incorporated by reference in the specific rule chapter for this type of permit.
[F.A.C. Rule 62-090. (1)]

{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/software.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.]

Executed in Broward County, Florida
BROWARD COUNTY POLLUTION PREVENTION,
REMEDATION AND AIR QUALITY DIVISION



Daniela Banu, Air Quality Administrator