



# Florida Department of Environmental Protection

Southwest District  
13051 N. Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## FINAL PERMIT

### PERMITTEE

Pall Aeropower Corp.  
10540 Ridge Road  
New Port Richey, FL 34654

Air Permit No. 1010335-007-AO

Permit Expires: 10/01/2014

Minor Air Operation Permit

Project Name: Filtration Equipment  
Manufacturing Facility

Authorized Representative:

Mr. Jeffery Brown, Plant Manager

This is the final air operation permit, which authorizes the operation of an aerospace, land and marine filtration equipment manufacturing facility (Standard Industrial Classification No. 3728). The facility is located in Pasco County at 10540 Ridge Road in New Port Richey, Florida. The UTM coordinates are Zone 17, 339.2 km East, and 3128.7 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution 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

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

- (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 the petitioner received notice of the agency decision;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (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 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 Department'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 of the Florida Administrative Code.

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

Mediation is not available in this proceeding.

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 Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Mara Grace Nasca September 29, 2009  
Mara Grace Nasca Effective Date  
District Air Program Administrator  
Southwest District

### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) 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 10/01/2009 to the persons listed below.

Mr. Jeffery Brown, Plant Manager, Pall Aeropower Corp.  
(Jeff\_Brown@pall.com)

Mr. Aamer K. Soofi, CHMM, Director Env. Compl. & Chemical Engr. Pall Aeropower Corp.  
(aamer\_soofi@pall.com)

Mr. Sultan Anjum, Senior Engineer, Environmental Compliance Services  
(sanjum@ecsconsult.com)

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.

Rhonda Hughes 10/01/2009  
(Clerk) (Date)

## SECTION 1. GENERAL INFORMATION (FINAL)

### FACILITY AND PROJECT DESCRIPTION

#### Existing Facility

This facility manufactures aerospace, land, and marine filters (air, lubrication, hydraulic, jet fuel, oil and water) and other filtration components for aircraft, tanks, and submarines. The existing facility consists of the following emissions units\*.

Facility ID No. 1010335	
ID No.	Emission Unit Description
001	Non-Halogenated VOC Cleaning Operations
003	Paint Spray Booth**
006	Chromic Acid Anodizing Tank

#### Emission Unit Permitting Notes:

\* The halogenated solvent cleaning equipment, which was previously a part of this facility and designated as EU 005, has been removed from the facility.

\*\* Previously EU 003 consisted of two (2) paint spray booths. These two booths have been replaced with one new larger booth which has the same inside area as the combined inside area of the two old booths.

#### Exempt Emission Sources/Activities

The following activities at this facility are considered Insignificant Emission Sources/ Activities in accordance with Rule 62-4.040 (1)(b), F.A.C. (insignificant impact):

- welding, brazing and soldering;
- handheld equipment used for cutting, sawing, sanding, trimming, routing, drilling, polishing, etc.;
- machining activities; and
- heat treat activities for stainless steel and aluminum alloys.

#### 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.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compounds (VOC) and hazardous air pollutants (HAPs).

#### PERMIT HISTORY/AFFECTED PERMITS

This minor source air operation permit replaces Title V Air Operation Permit 1010335-006-AV\*.

(\* Permitting Note - This facility was previously permitted on a Title V major source operation permit only because it was subject to 40 CFR 61 and 40 CFR 63 NESHAP's. Since the facility is an HAP area source which is not and has never been a major source for hazardous air pollutants (HAPs), it has been determined that it is not a Title V major source and can be permitted on a minor source air operation permit.)

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

---

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection  
Southwest District Office  
Air Resource Management Section  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-632-7600

All documents related to applications for permits to operate an emissions unit shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).
3. Appendices: The following Appendices are attached as part of this permit:
  - a. Appendix A. - Citation Formats and Glossary of Common Terms;
  - b. Appendix B. - General Conditions;
  - c. Appendix C. - Common Conditions;
  - d. Appendix D. - Common Testing Requirements;
  - e. Appendix E. - O&M Plan (Chromic Acid Anodizing Tank); and
  - f. Appendix F. - NESHAP 40 CFR 63 Subpart N (Chromium Emissions from Decorative Electroplating and Anodizing Tanks) (also includes applicable provisions of 40 CFR 63 Subpart A - General Provisions to 40 CFR 63).
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.
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.]
6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.  
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

---

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.  
[Rule 62-210.370(3), F.A.C.]
8. Operation Permit Renewal Application A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:
- a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions)*), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>;
  - b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
  - c. copies of the most recent two months of records/logs specified in Specific Condition No. A.8.; and
  - d. any revisions to the NESHAP 40 CFR 63 Subpart N (EU 006) O & M Plan (*Specific Condition No. A.9.*), if applicable.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

#### A. EU Nos. 001, 003, and 006 Surface Cleaning, Coating, and Anodizing

This section of the permit addresses the following emissions units, which are described in more detail below the table.

ID No.	Emission Unit Description
001	Non-Halogenated VOC Cleaning Operations
003	Paint Spray Booth
006	Chromic Acid Anodizing Tank

##### Non-Halogenated VOC Cleaning Operations (EU 001)

Various volatile organic solvents, including petroleum ether, mineral spirits, heptane, and ethyl alcohol are used for cleaning activities (cold degreasing) associated with the production of aerospace, land, and marine filters and filtration devices. Jet fuel is used for testing fuel filters in test tanks. These activities generally take place in the assembly area and machine shop.

##### Paint Spray Booth (EU 003)

Manufactured aluminum alloy and stainless steel filters and filtration devices are painted (primers and topcoats) in a Col-Met Spray Systems Model ATR-EMD-24-PS Modified Downdraft Pressurized paint spray booth (inside dimensions approximately 14' wide x 24' long x 9' tall). Particulate matter emissions due to paint overspray are controlled by dry filters.

##### Chromic Acid Anodizing Tank (EU 006)

This emissions unit is used to anodize aluminum parts. Emissions from the chromic acid anodizing tank are controlled by use of Zero-Mist™ surfactant (a wetting agent) which creates a layer of foam on the surface of the tank liquid. It also decreases the surface tension of the tank liquid. The foam blanket eliminates approximately 99% of the chromium mist air emissions.

#### PERFORMANCE RESTRICTIONS

- A.1. Federal Regulatory Requirements** – The Chromic Acid Anodizing Tank (EU 006) is subject to NESHAP 40 CFR 63 Subpart N – National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which is adopted by reference in Rule 62-204.800(11), F.A.C.

[Rule 62-204.800(11), F.A.C.]

*(Permitting Note -The applicable provisions of 40 CFR 63 Subpart N are attached as part of this permit in Appendix F - NESHAP 40 CFR 63 Subpart N (Chromium Emissions from Decorative Electroplating and Anodizing Tanks), which also includes the applicable provisions of 40 CFR 63 Subpart A - General Provisions to 40 CFR 63.)*

- A.2. Operating Hours** - The hours of operation for the emission units at this facility are not limited (i.e., permitted for 8,760 hours/year).

[Rules 62-4.070(3) and 62-210.200 (Potential to Emit), F.A.C.; Construction Permit 1010335-005-AC]

---

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

---

#### A. EU Nos. 001, 003, and 006 Surface Cleaning, Coating, and Anodizing

- A.3. Circumvention of Control Devices - The permittee shall not circumvent any air pollution control device (i.e., spray booth dry particulate filters, and anodizing tank surfactant) or allow the emissions of air pollutants without the applicable air pollution control device operating properly. In order to provide reasonable assurance that paint booth overspray is being effectively controlled, visible emissions from the spray booth exhaust shall not exceed 5% opacity. If this value is exceeded it will not be considered a violation in and of itself, but an indication that additional controls or increased filter maintenance (including filter replacement) may be required. (See also Item 2. of Appendix C – Common Conditions.) [Rules 62-4.070(3), and 62-210.650, F.A.C.; Construction Permit 1010335-005-AC]

#### EMISSIONS STANDARDS

- A.4. VOC Emission Limitation - Emissions of volatile organic compounds (VOCs) from the entire facility shall not exceed a total of 40.0 tons per any 12-consecutive-month period. [Rule 62-210.200 (Potential to Emit), F.A.C., Construction Permit 1010335-005-AC]
- A.5. HAP Emission Limitations - Combined emissions of all hazardous air pollutants (HAPs)(as defined in Rule 62-210.200 (Definitions), F.A.C.) from the entire facility shall be less than a total of 10.0 tons for any 12-consecutive-month period. [Rule 62-210.200 (Potential to Emit), F.A.C.; Construction Permit 1010335-005-AC]
- A.6. General Pollutant Emission Limiting Standards: Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions (see also Item 6. of Appendix C – Common Conditions) - 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 as follows:
- a. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/ maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials.
  - b. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.
  - c. Tightly cover or close all VOC containers when they are not in use.
  - d. Prevent excessive air turbulence across exposed VOCs.
  - e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.
- [Rule 62-296.320(1)(a), F.A.C.; Construction Permit 1010335-005-AC]
- A.7. General Particulate Emission Limiting Standards: Unconfined Particulate Matter - All reasonable precautions shall be taken to prevent and control generation of unconfined (fugitive) emissions of particulate matter in accordance with the provisions in Rule 62-296.320(4)(c)3., F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the use of dry particulate filters to control paint spray booth overspray emissions. (See also Item 9. of Appendix C - Common Conditions.) [Rule 62-296.320(4)(c), F.A.C.]



---

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

---

#### A. EU Nos. 001, 003, and 006 Surface Cleaning, Coating, and Anodizing

##### RECORDS AND O&M PLANS

- A.8. VOC/HAP Emission Records - In order to document compliance with the volatile organic compound (VOC) and hazardous air pollutants (HAP) emission limitations of Specific Condition Nos. A.4. and A.5., the permittee shall maintain a monthly log of the usage of all VOC and HAP containing materials used in association with the manufacturing activities at this facility. Monthly entries into the log shall be completed no later than the 10<sup>th</sup> day of the following month. At a minimum the log shall contain the following:
- facility name and Facility ID (1010335);
  - month and year of record;
  - the quantity used of each VOC and/or HAP containing material (gallons or pounds);
  - using the material density (if gallons are tracked) and VOC/HAP content (% by weight from MSDS sheets or other manufacturer's data), a calculation the monthly total HAP and VOC emissions for each material (pounds/month). (The log sheet shall show the HAP/VOC content used in the emission calculations for each material.)
  - a calculation of the total HAP emissions (all HAPs combined), and total VOC emissions for the facility for the month, and for the most recent 12-consecutive-month period (tons/12- consecutive-month period).

This method of determining emissions makes the conservative assumption that VOC/HAP usage equals emissions. A mass balance method may be used to determine each material's usage (amount used minus amount collected for disposal or recycle). At the permittee's option, "quantity purchased" may be reported to satisfy the requirement of "quantity used", provided no materials are used which are not purchased. Supporting documentation such as disposal/recycle records, HAP/VOC content, MSDS Sheets, "As Supplied" data sheets, purchase orders, etc. which includes sufficient information to determine emissions shall be kept for each material used. (See also Item 9. of Appendix C - Common Conditions for record retention requirements.)

[Rules 62-4.070(3), and 62-213.440(1)(b F.A.C.; Construction Permit 1010335-005-AC]

*(Permitting Note - Additional recordkeeping and reporting requirements are contained in Appendix F - NESHAP 40 CFR 63 Subpart N (which also includes applicable recordkeeping and reporting provisions of Subpart A - General Provisions of 40 CFR 60.)*

- A.9. Anodizing Tank (EU 006) NESHAP Subpart N Operation and Maintenance (O&M) Plan - The permittee shall follow an O&M Plan established for the Chromic Acid Anodizing Tank (EU 006) in accordance with the requirements of 40 CFR 63.342(f)(3)(i)\* (see Appendix F - NESHAP 40 CFR 63 Subpart N). In accordance with 40 CFR 63.342(f)(3)(v), the owner or operator shall keep the current written operation and maintenance plan on record to be made available for inspection, upon request, for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) version(s) of the operation and maintenance plan on record to be made available for inspection, upon request, for a period of 5 years after each revision to the plan.

[Rule 62-204.800(11), F.A.C.; NESHAP Subpart N 40 CFR 63.342(f)(3)]

*(\* Permitting Note - The current version of the O&M Plan is attached as part of this permit in Appendix E - O&M Plan (Chromic Acid Anodizing Tank.)*