



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Pall Aeropower Corporation
10540 Ridge Road
New Port Richey, FL 34654

Authorized Representative:
Mr. Jeffrey Brown, Plant Manager

Air Permit No. 1010335-008-AC
Permit Expires: 12/31/2016
Pall Aeropower Corporation
Minor Air Construction Permit
Project Name: Increase VOC/HAP emission
limits

This is the final construction permit to increase volatile organic compound (VOC) and hazardous air pollutants (HAP) emission limits of the facility. The proposed work will be conducted at the Pall Aeropower Corporation (Standard Classification No. 3728). The facility is located in Pasco County at 10540 Ridge Road, New Port Richey, Florida. The UTM coordinates are Zone 17, 339.23 km East, and 3128.72 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the FINAL permit.

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

Due to 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and 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 Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Kelley M. Boatwright 04/29/2013
Kelley M. Boatwright 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 Determination, 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 the date indicated below to the persons listed below.

Jeffrey Brown, Pall Aeropower Corporation (Jeff.Brown@pall.com)

John B. Koogler, Ph.D, P.E., Koogler and Associates, Inc. (jkoogler@kooglerassociates.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.

Anna Boatwright April 29, 2013
(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 (EUs).

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

Project Description and Affected Emissions Unit

This project is to increase volatile organic compound (VOC) and hazardous air pollutants (HAP) emission limits at the facility's Emission Unit (EU) No. 001 - Non-Halogenated VOC cleaning operations, EU No. 003 - Paint Spray Booth, and EU No. 006 - Chromic Acid Anodizing Tank. This project will modify the following emission units (EUs).

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

***NOTE:** Please reference the Permit No., Facility ID, and Emissions Unit ID in all correspondence, test report submittals, applications, etc.*

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.

Exemptions under Rule 62-4.040(1)(b), F.A.C., may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

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 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 hazardous air pollutants (HAPs). The emission limitations in this permit will ensure that the facility's HAPs emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

*This permit modifies Construction Permit No. 1010355-005-AC and references current Operation Permit No. 1010335-007-AO.

(* Permitting Note - This facility was previously permitted as a Title V major source only because it was subject to NESHAP 40 CFR 63, Subpart N – National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. Since the facility is an area source of hazardous air pollutant (HAP) which is not and has never been a major source for HAPs, it had been determined that it was not a Title V major source and could be permitted as a minor source. The facility is now requesting to increase its VOC emission limits from 40 ton per any 12-consecutive month period to 220 tons per any 12-consecutive month period that will make it a major source for VOC emissions. The HAP emissions will be raised from the current combined emissions from the entire facility of less than a total of 10.0 tons per any 12-consecutive month period to less than 10 tons for any individual HAP and less than 25 tons of total HAPs from the EU Nos. 001, 003 and 006 per any 12-consecutive month period. The facility will continue to be an area source for HAP and, therefore, will not be subject to 40 CFR 63, Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities).

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Resource Management Section. The Southwest District Office'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 shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance and Enforcement Section - Attention: AIR. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance and Enforcement Section – Attention: AIR
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

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.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

[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 emissions unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]
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. Annual Emissions Fee Form and Fee - This facility will become subject to Title V Annual Emissions Fees, in accordance with Rule 62-213.205, F.A.C., on the day EU Nos. 001, 003 & 006 commence operation. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: <http://www.dep.state.fl.us/air/emission/tvfee.htm>.
[Rule 62-213.205, F.A.C.]
9. Application for Title V Air Operation Permit -This permit authorizes increase of VOC and HAP emission limits from the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Title V air operation permit is required for continued operation of the permitted emissions units. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of Emissions Unit Nos. 001, 003 & 006. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Title V air 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. a copy of the most recent month of logs required by Specific Condition No. A.9.
 - c. any revisions to the NESHAP 40 CFR 63 Subpart N (EU 006) O & M Plan (*Specific Condition No. A.10.*), if applicable.

[Rules 62-4.030, 62-4.050, 62-4.070(3), and Chapter 62-213, F.A.C.]

SECTION 3. EMISSION 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 (EUs), which are described in more detail below the table.

EU 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 DownFINAL 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 applicable provisions of 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 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 No. 1010335-005-AC]

SECTION 3. EMISSION 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 No. 1010335-005-AC]

EMISSIONS STANDARDS

- A.4.** VOC Emission Limitation - Emissions of volatile organic compounds (VOC) from the emission units 001, 003 & 006 shall not exceed a total of 220.0 tons per any consecutive 12-month period.
[Rule 62-210.200 (Potential to Emit), F.A.C.; as requested by applicant in Construction Permit Application dated 02/15/2013]
- A.5.** HAP Emission Limitations – Individual emissions of hazardous air pollutant (HAP) (as defined in Rule 62-210.200 (Definitions), F.A.C.) from the emission units 001, 003 & 006 shall be less than a total of 10.0 tons per any consecutive 12-month period. Combined emissions of all HAPs from the emission units 001, 003 & 006 shall be less than a total of 25.0 tons per any consecutive 12-month period.
[Rule 62-210.200 (Potential to Emit), F.A.C.; as requested by applicant in Construction Permit Application dated 02/15/2013]
- 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:
- 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.
 - All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.
 - Tightly cover or close all VOC containers when they are not in use.
 - Prevent excessive air turbulence across exposed VOCs.
 - 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 No. 1010335-005-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

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

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.]

A.8. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU Nos. 001, 003 & 006, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

RECORDKEEPING AND O&M PLANS

A.9. 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 the emission units 001, 003 & 006. Monthly entries into the log shall be completed no later than the 10th 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 of the monthly individual HAP, total HAPs 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 individual HAP, total HAPs 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

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

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

sufficient information to determine emissions shall be kept for each material used. (*See also Item 10. of Appendix C - Common Conditions for record retention requirements.*)

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

(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 63.)

- A.10. 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.)*