CAPS File: Cleveland Pneumatic

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

Victoria J. Tschinkel
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

January 13, 1982

Ned Angene
Cleveland Pneumatic Product
Service Division
P. O. Box 520320
Miami, Florida 33152

Enclosed is Permit Number AC 13-41491, dated January 13, 1982
to Cleveland Pneumatic Product Service Division
issued pursuant to Section 403, Florida Statutes.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

for Tim Powell

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management

cc: Tom Tittle
William R. McCoy

CHF:caa

DER Form 17-1.122(65)

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AC 13-41491

Cleveland Pneumatic Product Service
Division, Inc.
P. O. Box 52 0320, Bldg. 2121
Miami International Airport
Miami, Florida 33152

DATE OF ISSUANCE

December 30, 1981

DATE OF EXPIRATION

June 1, 1982

DER FORM PERM 11-42

Final Determination

Cleveland Pneumatic Product Service Division, Inc.
P. O. Box 52 0320, Bldg. 2121
Miami, Florida 33152

Construction Permit
Application Number:
AC 13-41491

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting
December 30, 1981

Final Determination for Cleveland Pneumatic Product Service Division, Inc.'s Hanger Modification to Refurbish Landing Gears

The construction permit application and amendments from Cleveland Pneumatic Product Service Division, Inc. for the conversion of a hanger to rebuild/refurbish landing gears have been reviewed by the Bureau of Air Quality Management. The technical evaluation and preliminary determination was completed on October 28, 1981. Notice of the Department's Intent to Issue was published in the Miami Herald on November 2, 1981 fulfilling all State and Federal Notice requirements. Copies of the preliminary determination were available for public inspection at the Dade County's Environmental Resources Management Office, DER's South Florida Subdistrict Office and the Bureau of Air Quality Management - Tallahassee.

Comments were received from the DER South Florida Subdistrict Office. The memo to file, dated 12/30/81 (Attachment 7) addresses those comments in some detail. Resultant changes are:

1. Deletion of "de minimus" terms.

2. Deletion of the use of the "process weight table" in the application to the shot peen process.

3. Visible emission limits of "less than 20% opacity" will now be applied to the shot peen process and the spray paint booth operation replacing the "0%" opacity and "no visible emissions" originally imposed.

4. The sandblasting operation, because of its internal design, shall have "no external discharge" as its emission limit.

5. Chapter 17-2.16(6)(1)3., FAC, was condensed from the Specific Conditions and is now Attachment 8, and

6. Fugitive emissions will not be applicable.

All changes are now part of the final determination. Therefore, the construction permit should be issued as revised.

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR
Victoria J. Tschinkel
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Cleveland Pneumatic Products Service Division, Inc.
P. O. Box 52 0320, Bldg. 2121
Miami International Airport
Miami, Florida 33152

PERMIT/CERTIFICATION NO. AC 13-41491

COUNTY: Dade

PROJECT: Landing - Gear Rebuilding/Refurbishing Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the modification of an existing hangar at the Miami International Airport, Miami, Florida, to disassemble landing-gears, rebuild or replace parts, repaint or replate parts, and reassemble the parts. The UTM coordinates are 570.000 km. East and 2853.000 km. North (Zone 17).

Construction shall be in accordance with the permit application and its amendments, plans, documents, and drawings except as otherwise noted on pages 3 and 4 of "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16), and accompanying letter from Dade County's Environmental Resources Management Pollution Control Division.
2. Cleveland Pneumatic Company's letter of July 20, 1981 (Response to Technical discrepancies).
3. Cleveland Pneumatic Company's letter of October 8, 1981 (Response to Technical discrepancies).
4. Comments on Wastewater Discharge.
5. Trichloroethylene usage by the month for 1981 as received by phone from Mr. William D. Propes, Cleveland Pneumatic, Miami, Florida, (10/21/81 and 11/2/81).
6. Reclamation of solvents. Memo to file dated 11/4/81.
7. Letter from West Palm - comments on Construction Package dated 12/9/81; 12/30/81 - comments by Tallahassee CAPS.
8. Chapter 17-2.17(6)(ℓ)3, FAC.

PERMIT NO.: AC 13-41491
APPLICANT: Cleveland Pneumatic

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions:, and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. In 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 source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department 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 department rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalities therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

[ ] Determination of Best Available Control Technology (BACT)
[ ] Determination of Prevention of Significant Deterioration (PSD)
[ ] Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 13-41491
APPLICANT: Cleveland Pneumatic

SPECIFIC CONDITIONS:

1. Operation hours shall be 2,080 hours per year.
2. Maximum allowable emissions from the open top degreaser shall be 10.58 lbs./hr. (11.0 TPY). VOC emissions shall be accounted for by accurate record keeping and submittal of annual operation reports (DER FORM 17-1.122(44) on or before March 1st of each year, to the DER South Florida Subdistrict Office and Dade County's Environmental Resources Management - Pollution Control Division.
3. The paint spray booth shall not be operated unless the exhaust fan and filters are functioning as designed. Emission limitations shall be visible emissions - no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere particulate matter, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart the opacity of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart the opacity of which is equal to or greater than 20 percent. Compliance tests shall be conducted using DER Method 9.
4. The applicant shall be required to comply with 17-2.16(6)(1)3., FAC (See Attachment 8).
5. The baghouses associated with the shot-peen and sandblasting systems shall be operated as designed.
   a. As designed, the sandblaster is a self-contained unit with an integral recirculating dust collector with no external discharge.
   b. Emission limits from the shot peen processes' baghouse shall be visible emissions such that no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere particulate matter, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart the opacity of which is equal to or greater than 20 percent. Compliance tests shall be conducted using DER Method 9.
6. The applicant shall notify the Department 10 days prior to conducting compliance tests.
7. Following approval of compliance test results and prior to 90 days before the expiration date of this permit, a complete application for an Operating Permit shall be submitted to the DER South Florida Subdistrict Office and Dade County's Environmental Resources Management-Pollution Control Division. Full operation of the source may then be conducted in compliance with the terms of this permit until expiration or receipt of an Operating Permit.
8. The annual operating report, refer to Specific Condition #2, shall contain solvent purchased, solvent reclaimed, and operating hours.
9. Objectionable odor control must be satisfied according to 17-2.05(4), FAC.

PERMIT NO.: AC 13-41491
APPLICANT: Cleveland Pneumatic

Expiration Date: June 1, 1982

4 Pages Attached.

Issued this 12 day of [illegible], 19[illegible].

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Signature

→ P.4/6

Check Sheet

Company Name: Cleveland Pneumatic
Permit Number: AC13-41491
PSD Number:
County: Dade
Permit Engineer:
Others involved:

Application:
- [x] Initial Application
- [x] Incompleteness Letters
- [x] Responses
- [ ] Final Application (if applicable)
- [ ] Waiver of Department Action
- [ ] Department Response

Intent:
- [x] Intent to Issue
- [x] Notice to Public
- [x] Technical Evaluation
- [ ] BACT Determination
- [x] Unsigned Permit

  Attachments:
  - [ ]
  - [ ]
  - [ ]

- [ ] Correspondence with:
  - [ ] EPA
  - [ ] Park Services
  - [ ] County
  - [x] Other
- [x] Proof of Publication
- [ ] Petitions - (Related to extensions, hearings, etc.)

Final Determination:
- [x] Final Determination
- [x] Signed Permit
- [ ] BACT Determination

Post Permit Correspondence:
- [ ] Extensions
- [x] Amendments/Modifications
- [ ] Response from EPA
- [ ] Response from County
- [ ] Response from Park Services

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. Those documents can be found in the supplementary documents file drawer. Folders in that drawer are arranged alphabetically, then by permit number.

Folder Name: Cleveland Pneumatic
AC 13-41491

Period During Which DOCUMENT WAS SUBMITTED (APPLICATION, PD & TE, FINAL DETERMINATION, POST PERMIT)	Detailed Description
APP	1. 3 @ 22"x34" Blueprints a) PROPOSED WASTEWATER PRETREATMENT PROCESS & INSTRUMENTATION DIAGRAM DWG NO 81004-CE-1 b) PROPOSED WASTEWATER PRETREATMENT GENERAL ARRANGEMENT DWG NO. 81004-CE-2 c) PLATING & SURFACE PREP AREAS GENERAL ARRANGEMENT DWG NO. 81004-CE-3 2. ENGINEERING REPORT FOR WASTEWATER PRETREATMENT FACILITIES AND AIR POLLUTION CONTROL FACILITIES

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Cleveland Pneumatic file: AC 13-41491

FROM: R. Bruce Mitchell

THROUGH: Bill Thomas, P.E.
C. H. Fancy, Deputy Chief

DATE: July 20, 1984

SUBJECT: Comments from I. Goldman with the DER Southeast Florida District office and received via a phone conversation

Mr. Goldman said that there are no substantive comments concerning the amendments requested by the company to the above referenced construction permit and the recommendation is to incorporate the company's requests into the referenced construction permit via a modification to the permit and the Secretary's signature.

BM/agh

SOUTHEAST
ENVIRONMENTAL CONSULTANTS, INC.
10740 Hickory Avenue
Pembroke Pines, Florida 33026
(305)431-6849

• MANAGEMENT • ENGINEERING • TESTING

DER
JUL 11 1984
BAQM

June 21, 1984

Mr. Clair Fancy
BAQM
State of Florida
Department of Environmental Regulation
2600 Blairstone Road
Tallahassee, Florida 32301-8241

Dear Mr. Fancy:

In accordance with our discussions this morning we are pleased to submit two (2) copies of the "Amended" Cleveland Pneumatic Product Service Division, Inc. "Application to Construct" to reflect a change in the permitted hours of operation of the facility in accordance with the request of the WPB District office. Also enclosed is the previous certificate of completion, appropriate compliance test results, process weight statements, and a copy of the most recent "Annual Operations Report Form for Air Emissions Sources". One copy of all data has been submitted to both the WPB District office and MDERM, under separate cover.

Should you have any questions on the above, please contact me at (305) 431-6849.

Sincerely,

H. J. Bauch P.E.

H. J. Bauch, P.E.
Executive Director

Enclosures

HJB:km

cc: W. F. Grun, Cleveland Pneumatic
M. McCormack, Cleveland Pneumatic
P. Wong, MDERM
I. Goldman, FDER - WPB.

AC 13-090247

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Aircraft landing gear rebuilding [ ] New[1] [X] Existing[1]

APPLICATION TYPE: [X] Construction [ ] Operation [ ] Modification

COMPANY NAME: Cleveland Pneumatic Product Services Division, Inc. COUNTY: Dade

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) (2)Dust collectors,(1)paint spray booth,(1)vapour degreaser,&(2) fume scrubbers.

SOURCE LOCATION: Street 6445 NW 25th St. Bldg. #2121-MIAD City Miami, Florida

Zone 17 UTM: East 570073 km E North 2853159 km N

Latitude 25 ° 47 ' 45 "N Longitude 80 ° 18 ' 05 "W

APPLICANT NAME AND TITLE: William F.Grun-Vice President & General Manager.

APPLICANT ADDRESS: P.O. Box 520320, Miami Florida 33152

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Cleveland Pneumatic Product Service Division, Inc.

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: William F. Grun for

William F. Grun-Vice President
Name and Title (Please Type)

Date: 6/20/84 Telephone No. (305)871-3420

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed: H. S. Bauch P.E.

H. S. Bauch, P.E.
Name (Please Type)

(Affix Seal)

Southeast Environmental Consultants, Inc.
Company Name (Please Type)

10740 hickory Avenue
Pembroke Pines, Florida 33026
Mailing Address (Please Type)

Florida Registration No. #22011 Date: 6/20/84 Telephone No. (305)431-6849

[1]See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See Attachment #1

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction N.A. Completion of Construction N.A.

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Spray booth - $12,000

Vapour degreaser - $1,000

Dust Collectors - $16,000

Fume Scrubbers - $60,000

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC13-41491 Issued 1/13/83 Expired 6/1/82

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? ____ Yes __x__ No

F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ; if power plant, hrs/yr N.A. ;

if seasonal, describe:

G. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? Yes

   a. If yes, has "offset" been applied? N.A.

   b. If yes, has "Lowest Achievable Emission Rate" been applied? Yes *

   c. If yes, list non-attainment pollutants. Ozone

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. No

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirements apply to this source? If yes, see Sections VI and VII. No

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? No

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? No

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable. * Vapour Degreaser rule requirements are met.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Trichloroethylene	Voc	100%	Less than 15.75	Vapor degreaser
Methyl Ethyl Ketone	Voc	100%	Less than 0.45	Paint spray booth
Toluene Thinner	Voc	100%	Less than 0.82	Paint spary booth
Paint & Primer	Voc	45%	Less than 0.41	Paint spary booth

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): N/A

2. Product Weight (lbs/hr): N/A

C. Airborne Contaminants Emitted:

Name of Contaminant	Emission[1]		Allowed Emission[2] Rate per Ch. 17-2, F.A.C.	Allowable[3] Emission lbs/hr	Potential Emission[4]		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
Voc	7.88	34.40 34.50	LT 100#/hr & 50T/yr	7.88	15.75	68.80	Vapor Degreaser
Voc	1.38	6.05	LT 3#/hr & 15#/day*	1.38	1.38	6.05	Paint spray
Particulate	0.02	0.09	V.E. LT 20% opacity	0.02	0.21	0.93	Paint spray
Particulate	0.49	0.77	V.E. LT 20% opacity	0.49	98.57	153.77	shot Peen
Particalate	0.51	0.79	V.E. LT 20% opacity	0.51	101.14	157.78	sand Blast

*(paint & Primer only)

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles[5] Size Collected (in microns)	Basis for Efficiency (Sec. V, It[5]
Mapco Model #MW-100 Fume Scrubber	Metal Plating Bath Fumes	97%	N/A	Vendor
Mapco Model #MW-100D Fume Scrubber	Metal Plating Bath Fumes	99%	N/A	Vendor
* Vacu-Blast Dust Collector	Sandblasting Dust	No Discharge	N/A	N/A
Pangborn Model#168-CT-614 Dust Collector	Shot Peen Dust	99.5%	To 0.5 Micron	Vendor
Vapor Degreaser Tank	Solvent Cleaning Solution	50%	N/A	AP42
Devilbiss Model#XDF-6215 Paint Arrestor	Spray Paint Particles	90%	N/A	Vendor
* Ruemelin series #3100KD Dust Collector	Sand Blasting Dust	99.5%	To o.5 Micron	Estimated

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E. (1), F.A.C. – 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard

[4]Emission, if source operated without control (See Section V, Item 3)

[5]If Applicable *Vacu-Blast Dust Collector replaced by Ruemelin Dust Collector

E. Fuels - N.A.

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units Natural Gas, MMCF/hr; Fuel Oils, barrels/hr; Coal, lbs/hr

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. Annual Average N.A. Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.
Liquid waste from scrubbers overflow will be treated in wastewater pretreatment plant. Paint filters and collected dust will be disposed in accordance with appropriate regulations.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack): #1 / #2 / #3 /

Stack Height: 35'+/ 30'+/30'+ ft. Stack Diameter: 34" / 6ft^2 / 6ft^2 ft.

Gas Flow Rate: 12,500/11,500/11,800 ACFM Gas Exit Temperature: ambient °F.

Water Vapor Content: ambient % Velocity: 33.1/32.0/32.8 FPS

#1 - Paint spray booth data
#2 - Shot Peen discharge data
#3 - Sand Blast discharge data

SECTION IV: INCINERATOR INFORMATION - N.A.

Type of Waste	Type O (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By-prod.)
Lbs/hr Incinerated							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ days/week _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner [ ] Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight – show derivation. – N.A.
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.,) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made. See Attachment #1, #4, & #5
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
   See Attachment #1
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, etc.).
   Not applicable
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3, and 5 should be consistent: actual emissions = potential (1-efficiency).
   Not applicable
6. An 8½" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
   See Attachment #2
7. An 8½" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
   See Attachment #3
8. An 8½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
   See Attachment #2

9. An application fee of ~~$20.~~ $100 unless exempted by Section 17-4.05(3), F.A.C. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit. See Attachment #4.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY - N.A.

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?
[ ] Yes [ ] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy) [ ] Yes [ ] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:
2. Operating Principles:
3. Efficiency:*
4. Capital Costs:
5. Useful Life:
6. Operating Costs:
7. Energy:
8. Maintenance Cost:
9. Emissions:

Contaminant	Rate or Concentration

*Explain method of determining D 3 above.

Pages 7,8,9,&10 of 10 are deleted as not applicable

Southeast Environmental Consultants, Inc. ○ Management ○ Engineering ○ Testing	Cleveland Pneumatic Product Service Division, Inc. Attachment # 1 – Supplemental Information	

Section II A.-

The facility project consisted of the modification of an existing building identified as MIAD #2121 and located at 6445 NW 25th Street for purpose of an Aircraft landing gear rebuilding operation as permitted under construction permit #AC13-41491. Two dust collectors, one paint spray booth, and one vapor degreaser were installed, inspected, and tested in accordance with Attachment #4 to provide demonstration that the modified facility is in full compliance with all applicable regulations.

Additional modifications to improve the sand blast dust collector as shown in Attachment #5 will also result in full compliance upon completion and submission of suitable Visible Emission test results.

Section III - C

Vapor Degreaser - (VOC)
Solvent - Trichloroethylene
Area = 105 ft^2 365 x 24 = 8760 ✓
Operating Time = 24x7x52=8736 hours/year
AP-42 Table 4.6-1 Uncontrolled emission factor = 0.15lb/hr-ft^2
∴potential Emission = 0.15 x 105 x 8376 ÷ 2000 = 68.80 Tons/year
(and) 68.985 ✓
= 0.15 x 105 = 15.75 lbs/hr
from AP42 Table 4.6-2 for Vapor degreaser system D
% emission reduction = 50% (range of 45% to 75%)
∴Actual Emission = 50% Potential Emission
= 50% x 68.80 Tons/year = 34.40
(and) 34.493 ✓
= 50% x 15.75 lbs/hr = 7.88 lbs/hr ✓

Paint Spray Booth (VOC)
Paint & Primer = 3377 lbs/year. @ 45% V.O.C.
(from origional application)
Toluene Thinner = 6845 lbs/year @ 100% V.O.C.
(@ historical use rate of 2.03 times Paint & Primer use)
Methyl Ethyl Ketone = 3727 lbs/year @ 100% VOC
(@ historical use rate of 1.10 times Paint & Primer use)
∴Potential Emission = (45% x 3377 + 6845 + 3727)÷2000 = 6.05 T/yr.
(and)
= (45% x 3377 + 6845 + 3727)÷8736 = 1.38 lbs/hr
Potential Emission = Actual Emission 8760 1.38 ✓
(Since VOC's are uncontrolled)
∴Actual Emission = 6.05 T/yr.
(and)
= 1.38 lbs/hr

Paint Spray Booth - (Particulate Matter)
Paint & Primer = 3377 lbs/year @ 55% Particulate Matter
∴Potential Emission = 55% x 3377 ÷ 2000 = 0.93 T/yr.
(and)
= 55% x 3377 ÷ 8736 = 0.21 lbs/hr
from previous application vendor data, 8760 - 0.21 ✓
Paint filter control efficiency = 90%
∴Actual Emission = (1-90%) Potential Emission

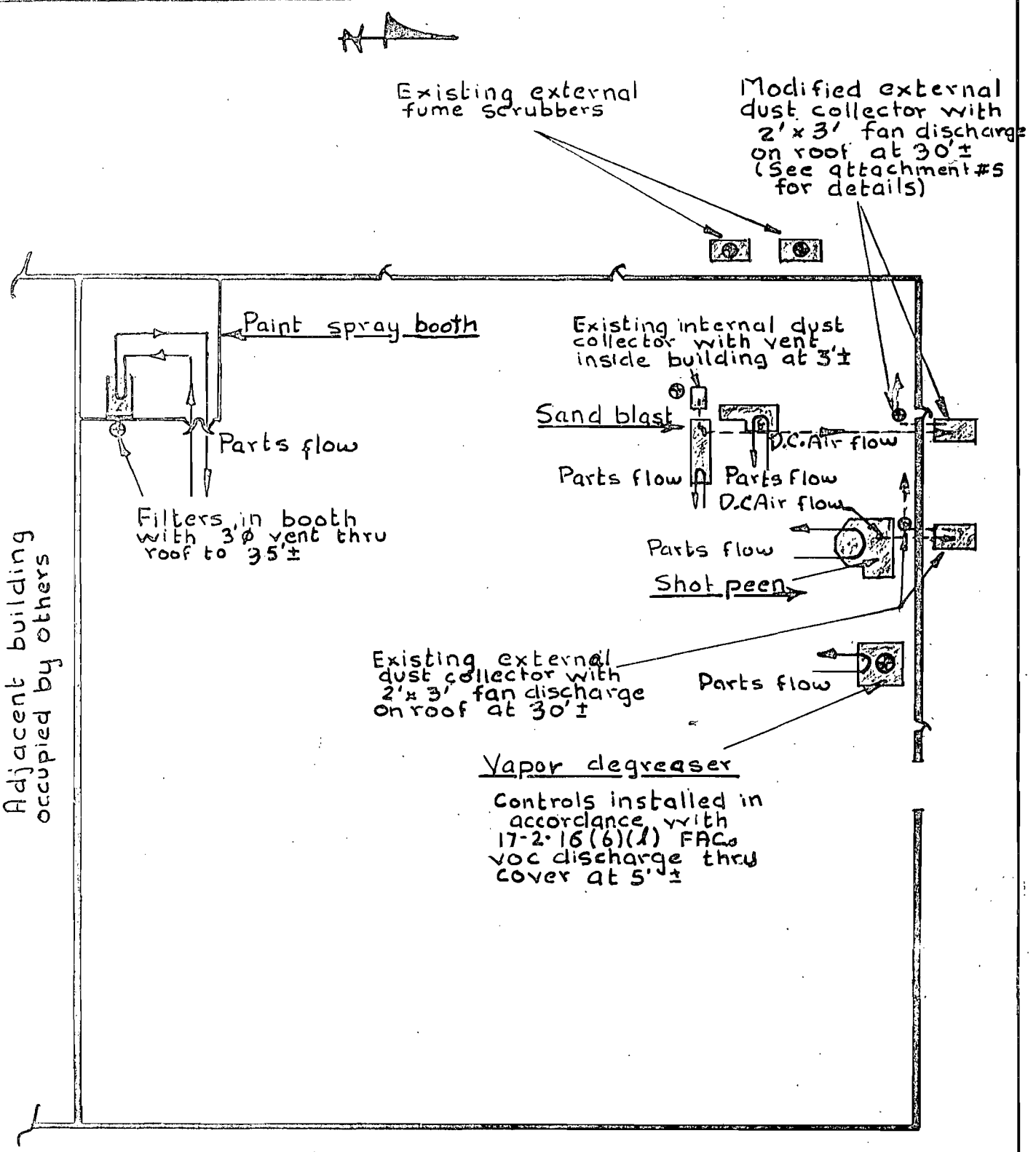
= 0.10 x 0.93 = 0.09 T/yr.
(and)
= 0.10 x 0.21 = 0.02 lbs/hr.

Shot Peen - (Particulate Matter)
From previous application
discharge flow = 11,500 cfm.
Emission factor = 1.0 grains/cf
Pangborn Dust collector control efficiency = 99.5%
Operating hours = 3120 hr/year.
From above -
Potential Emissions = 1/7000 x 11,500 x 3120 x 60 ÷ 2000 = 153.77 T/yr.
(and)
= 1/7000 x 11,500 x 60 = 98.57 lbs/hr.
Dust Collector Control efficiency = 99.5%
∴Actual Emissions = (1-99.5%) Potential Emission
= .005 x 153.77 = 0.77 T/yr.
(and)
= .005 x 98.57 = 0.49 lbs/hr.

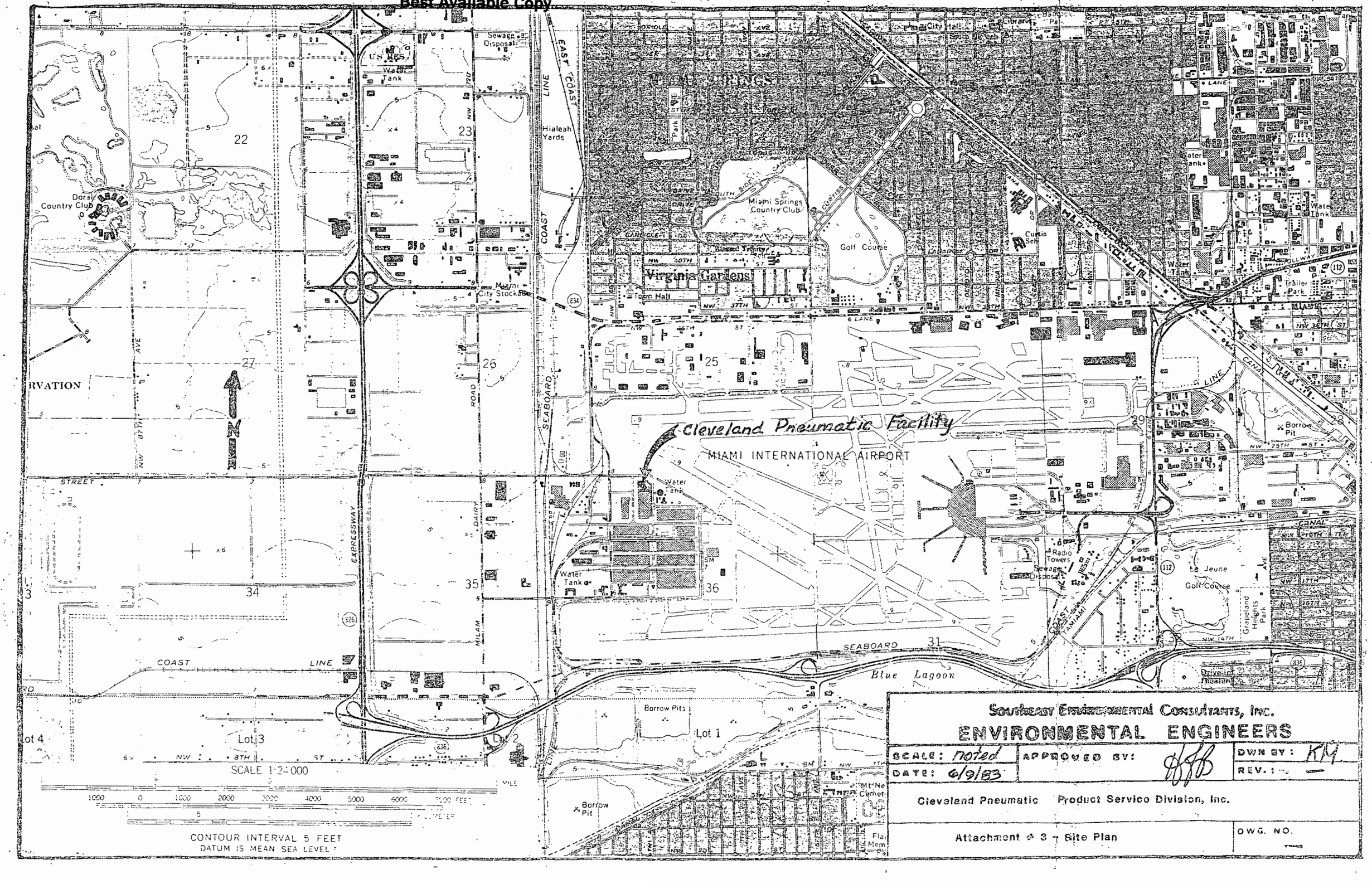
Sand Blast - (Particulate Matter)
Discharge flow = 11,800 cfm.
Emission factor = 1.0 grains/cf.
Ruemelin Dust Collector Control efficiency = 99.5%
Operating hours = 3120 hr/year

From above -
Potential Emissions = 1/7000 x 11,800 x 3120 x 60 ÷ 2000 = 157.78 T/yr.
(and)
= 1/7000 x 11,800 x 60 = 101.14 lbs/hr
Dust Collector Control efficiency = 99.5%
∴Actual Emissions = (1-99.5%) Potential Emission.
= .005 x 157.78 = 0.79 T/yr.
(and)
= .005 x 101.14 = 0.51 lbs/hr.

SOUTHEAST ENVIRONMENTAL CONSULTANTS, INC. ○ MANAGEMENT ○ ENGINEERING ○ TESTING	Cleveland Pneumatic Product Service Division, Inc. Attachment # 2 – Plot Plan and Flow Diagram	6/16/83 Scale: 1"=50' KPG



Note: for location of building see "Site Plan" - Attachment #3.



Southeast Environmental Consultants, Inc.

ENVIRONMENTAL ENGINEERS

SCALE: noted	APPROVED BY:	DWN BY: KM
DATE: 6/9/83		REV.: —

Cleveland Pneumatic Product Service Division, Inc.

Attachment # 3 - Site Plan

DWG. NO. —

SOUTHEAST ENVIRONMENTAL CONSULTANTS, INC. ○ MANAGEMENT ○ ENGINEERING ○ TESTING	Cleveland Pneumatic Product Service Division, Inc. Attachment # 4 - Compliance Test Results	

(See attached sheets)

10740 Hickory Avenue
Pembroke Pines, Florida 33026
(305)431-6849

SOUTHEAST ENVIRONMENTAL CONSULTANTS, INC.

○ MANAGEMENT ○ ENGINEERING ⊖ TESTING

May 23, 1983

PROCESS WEIGHT STATEMENT

Facility: Cleveland Pneumatic Product Service Division

Facility Contact: William D. Propes.
Mark McCormack.

The shot peen cleaning process, paint spray booth, and sand blast cleaning process were operated at the exhaust fan design capacity during the entire period of Visible emission testing. During the period of paint spray booth testing, parts were primed during an approximate half of the test period and painted during the balance of the test period.

Both the shot peen cleaning process and the paint spray booth were operating well with no evidence of fugitive emissions.

The Sand blast cleaning process equipment operating within the building had a damaged seal which resulted in the visible emission levels being emitted from the equipment vent inside the building. Particulate matter was confined within an approximate 10 ft. radius. The facility owner is in the process of providing Modifications to improve this operation thru the nearly complete installation of a large central dust collector outside the north wall of the building.

This test for the detection of Visible Emission (opacity) has been conducted in accordance with the Department of Environmental Regulation Method 9. as described in the Florida Administrative Code, Chapter 17-2.23(6)(a)9.

Sincerely,

H. J. Bauch P.E.

H. J. Bauch P.E.
Executive Director

cc:MDERM
W. Propes - Cleveland Pneumatic

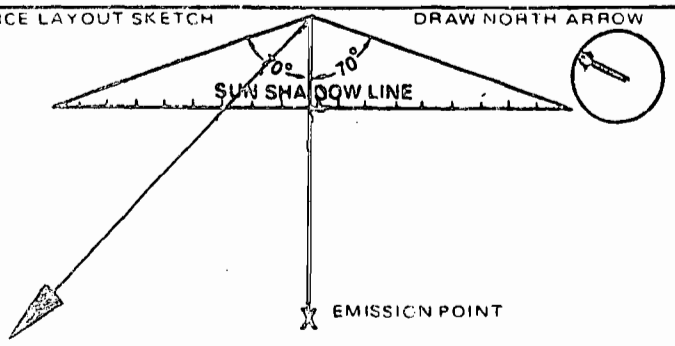
HJB:km

SOUTHEAST ENVIRONMENTAL CONSULTANTS, INC.
10740 Hickory Avenue
Pembroke Pines, Florida 33026
(305) 431-6849

VISIBLE EMISSION OBSERVATION FORM

SOURCE NAME: Cleveland Pneumatic
ADDRESS: 6445 N.W. 25th Street, Miami
STATE: Florida | ZIP: 33152 | TELEPHONE: (305) 871-3420
SOURCE ID NUMBER: AC13-41491 | OBSERVATION DATE: 5/23/83
PROCESS: Shot peen parts cleaning | OPERATING MODE: Batch
CONTROL EQUIPMENT: Dust collector Baghouse | OPERATING MODE: Batch
DESCRIBE EMISSION POINT: Exhaust Fan Outlet
HEIGHT ABOVE GROUND LEVEL: 30' | HEIGHT RELATIVE TO OBSERVER: 25'
DISTANCE FROM OBSERVER: 30' | DIRECTION FROM OBSERVER: S W
DESCRIBE EMISSIONS: None visible
EMISSION COLOR: None visible | PLUME TYPE: CONTINUOUS [X] INTERMITTENT [ ] FUGITIVE [ ]
WATER DROPLETS PRESENT: NO [X] YES [ ] | IF YES, IS PLUME: ATTACHED [ ] DETACHED [ ] N.A.
AT WHAT POINT WAS OPACITY DETERMINED: discharge of Fan
DESCRIBE BACKGROUND: Blue, Gray, white, sky.
BACKGROUND COLOR: Blue, Gray, and white | SKY CONDITIONS: 65% cloudy
WIND SPEED: 3-5 mph. | WIND DIRECTION: East
AMBIENT TEMPERATURE: 75°F | RELATIVE HUMIDITY: 65%
COMMENTS: Area clean and free of Fugitive Emissions.

SOURCE LAYOUT SKETCH — DRAW NORTH ARROW



OBSERVER'S NAME (PRINT): Kirk A. MacFarland
ORGANIZATION: Southeast Environment Consultants, Inc.
CERTIFIED BY: State of Florida. — D.E.R. | DATE: 3/83

START TIME: 9:50:00 AM | STOP TIME: 10:19:45 AM

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27	0	0	0	0	57				
28	0	0	0	0	58				
29	0	0	0	0	59				
30	0	0	0	0	60				

AVERAGE OPACITY FOR FOR HIGHEST PERIOD: 0%
NUMBER OF READINGS ABOVE: 20 % WERE 0
RANGE OF OPACITY READINGS: 0% MINIMUM | 0% MAXIMUM

OBSERVER'S SIGNATURE: Kirk MacFarland | DATE: 5/23/83
VERIFIED BY: J. Hauck P.E.
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS
SIGNATURE: —
TITLE: — | DATE: —

SOUTHEAST ENVIRONMENTAL CONSULTANTS, INC.

10740 Hickory Avenue
Pembroke Pines, Florida 33026
(305) 431-6849

VISIBLE EMISSION OBSERVATION FORM

SOURCE NAME: Cleveland Pneumatic

ADDRESS: 6445 N.W. 25th Street, Miami

STATE: Florida | ZIP: 33152 | TELEPHONE: (305) 871-3420

SOURCE ID NUMBER: AC13-41491 | OBSERVATION DATE: 5/23/83

PROCESS: Paint Spray Booth | OPERATING MODE: Batch

CONTROL EQUIPMENT: Filter Control Booth | OPERATING MODE: Batch

DESCRIBE EMISSION POINT: Exhaust Duct Outlet

HEIGHT ABOVE GROUND LEVEL: 35'

HEIGHT RELATIVE TO OBSERVER: 5'

DISTANCE FROM OBSERVER: 20'

DIRECTION FROM OBSERVER: Northwest

DESCRIBE EMISSIONS: None visible

EMISSION COLOR: None visible

PLUME TYPE: CONTINUOUS [X] INTERMITTENT [ ] FUGITIVE [ ]

WATER DROPLETS PRESENT: NO [X] YES [ ]

IF YES, IS PLUME: ATTACHED [ ] DETACHED [ ] N.A.

AT WHAT POINT WAS OPACITY DETERMINED: discharge of Vent

DESCRIBE BACKGROUND: Blue, Gray, and white cloudy sky.

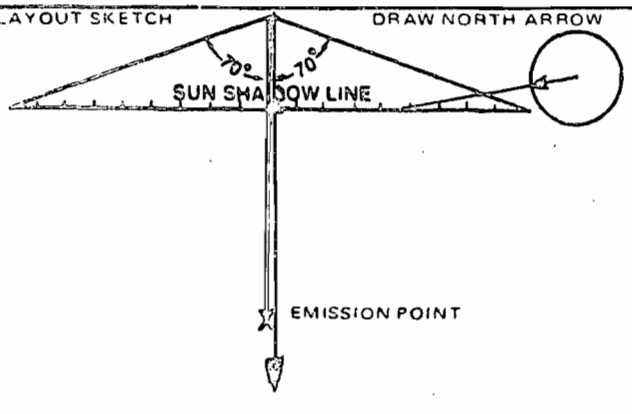
BACKGROUND COLOR: Blue, Gray, + white | SKY CONDITIONS: 65% cloudy

WIND SPEED: 3-5 mph | WIND DIRECTION: East

AMBIENT TEMPERATURE: 75 °F | RELATIVE HUMIDITY: 65%

COMMENTS: Area clean and free of Fugitive Emissions.

SOURCE LAYOUT SKETCH



OBSERVER'S SIGNATURE: Kirk A. MacFarland | DATE: 5/23/83

VERIFIED BY: [illegible] P.E.

OBSERVER NAME (PRINT): Kirk A. MacFarland

ORGANIZATION: Southeast Environmental Consultants, Inc.

CERTIFIED BY: State of Florida-D.E.R. | DATE: 3/83

START TIME: 10:45:00 AM. | STOP TIME: 11:26:45 AM.

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27	0	0	0	0	57				
28	0	0	0	0	58				
29	0	0	0	0	59				
30	0	0	0	0	60				

AVERAGE OPACITY FOR FOR HIGHEST PERIOD: 0%

NUMBER OF READINGS ABOVE: 20 % WERE 0

RANGE OF OPACITY READINGS: 0% MINIMUM | 0% MAXIMUM

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS.

SIGNATURE: —

TITLE: — | DATE: —

SOUTHEAST
ENVIRONMENTAL CONSULTANTS, INC.

10740 Hickory Avenue
Pembroke Pines, Florida 33026
(305) 431-6849

VISIBLE EMISSION OBSERVATION FORM

SOURCE NAME: Cleveland Pneumatic

ADDRESS: 6445 N.W. 25th Street, Miami

STATE: Florida | ZIP: 33152 | TELEPHONE: (305) 871-3420

SOURCE ID NUMBER: AC13-41491 | OBSERVATION DATE: 5/23/83

PROCESS: Sand blast parts cleaning | OPERATING MODE: Batch

CONTROL EQUIPMENT: Closed System-Inside Bldg. | OPERATING MODE: Batch

DESCRIBE EMISSION POINT: Enclosure Vent

HEIGHT ABOVE GROUND LEVEL: 3' | HEIGHT RELATIVE TO OBSERVER: 0'

DISTANCE FROM OBSERVER: 15' | DIRECTION FROM OBSERVER: WEST

DESCRIBE EMISSIONS: Puffs

EMISSION COLOR: beige | PLUME TYPE: CONTINUOUS ☒ INTERMITTENT ☐ FUGITIVE ☐

WATER DROPLETS PRESENT: NO ☒ YES ☐ | IF YES, IS PLUME: ATTACHED ☐ DETACHED ☐ N.A.

AT WHAT POINT WAS OPACITY DETERMINED: Equipment Vent discharge inside building

DESCRIBE BACKGROUND: adjacent Machinery Enclosure

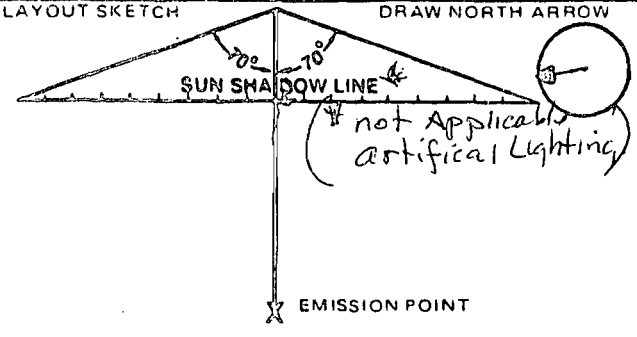
BACKGROUND COLOR: DARK GRAY | SKY CONDITIONS: N.A.

WIND SPEED: N.A. | WIND DIRECTION: N.A.

AMBIENT TEMPERATURE: 75°F | RELATIVE HUMIDITY: 65%

COMMENTS: Emissions consist of SAND Particles which settle on floor within 10' RADIUS. System is being modified to use an improved LARGER outside dust collector.

SOURCE LAYOUT SKETCH — DRAW NORTH ARROW



OBSERVER'S NAME (PRINT): Kirk A. MacFarland

ORGANIZATION: Southeast Environmental Consultants, Inc.

CERTIFIED BY: State of Florida D.E.R. | DATE: 3/83

START TIME: 11:37:00 AM | STOP TIME: 12:06:45 PM

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27	0	0	0	5	57				
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30	0	0	0	0	60				

AVERAGE OPACITY FOR FOR HIGHEST PERIOD: 2.29%

NUMBER OF READINGS ABOVE: 20% WERE 0

RANGE OF OPACITY READINGS: 0% MINIMUM | 5% MAXIMUM

OBSERVER'S SIGNATURE: Kirk A. MacFarland | DATE: 5/23/83

VERIFIED BY: A. Bauch P.E.

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS.

SIGNATURE: —

TITLE: — | DATE: —

SOUTHEAST
ENVIRONMENTAL CONSULTANTS, INC.
10740 Hickory Avenue
Pembroke Pines, Florida 33026
(305)431-6849
O MANAGEMENT O ENGINEERING O TESTING

May 23, 1983

Inspection Report on Vapor Degreaser

Facility: Cleveland Pneumatic Product Service Division

Facility Contact: William D. Propes.
Mark McCormack.

The Vapor Degreaser was personally inspected on 5/23/83 and found in substantial compliance with sections 17-2.16(6)(1)3. as follows:

- appropriate Cover (17-2.16(6)(1)3.a.)
- appropriate safety Switches (17-2.16(6)(1)3.b.)
- appropriate freeboard ratio, cover and chiller (17-2.16(6)(1)3.c
- Permanent conspicuous Instructions (17-2.16(6)(1)3.d.)

The above items appear to be suitably provided in accordance with all applicable regulations.

Sincerely,

H. J. Bauch P.E.

H. J. Bauch, P.E.
Executive Director

HJB:km

SOUTHEAST
ENVIRONMENTAL CONSULTANTS, INC.
10740 Hickory Avenue
Pembroke Pines, Florida 33026
(305)431-6849
MANAGEMENT ENGINEERING TESTING

February 27, 1984

PROCESS WEIGHT STATEMENT

Facility: Cleveland Pneumatic Product Service Division

Facility Contact: Dave Sibila
Mark McCormack

The sand blast cleaning process was operated at the exhaust fan design capacity during the entire period of Visible Emission testing.

The area was clean and free of fugitive emissions. The visible emission test results indicated compliance with all applicable standards.

This test for the detection of Visible Emissions (opacity) has been conducted in accordance with the Department of Environmental Regulation Method 9.

Sincerely,

H. J. Bauch, P.E.

H. J. Bauch, P.E.
Executive Director

cc:MDERM
M. McCormack

HJB:km

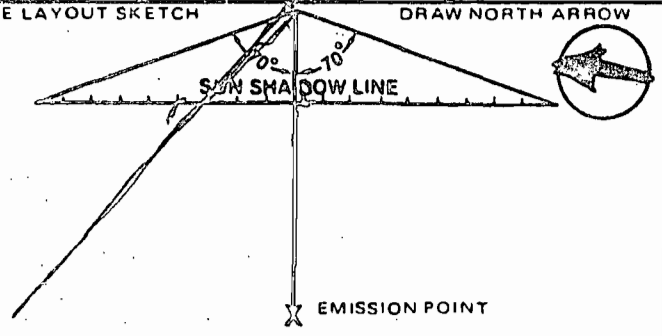
SOUTHEAST ENVIRONMENTAL CONSULTANTS, INC.

VISIBLE EMISSION OBSERVATION FORM

10740 Hickory Avenue
Pembroke Pines, Florida 33026
(305) 431-6849

SOURCE NAME: Cleveland Pneumatic
ADDRESS: 6445 NW 25th Street, Miami
STATE: Florida | ZIP: 33152 | TELEPHONE: (305) 871-3420
SOURCE ID NUMBER: ACB-41491 | OBSERVATION DATE: 2/27/84
PROCESS: Sand blast Parts Cleaning | OPERATING MODE: Continuous
CONTROL EQUIPMENT: Baghouse Dust Collector | OPERATING MODE: Continuous
DESCRIBE EMISSION POINT: Exhaust Fan Outlet
HEIGHT ABOVE GROUND LEVEL: 24' | HEIGHT RELATIVE TO OBSERVER: 18'
DISTANCE FROM OBSERVER: 50' | DIRECTION FROM OBSERVER: WSW
DESCRIBE EMISSIONS: none visible
EMISSION COLOR: none visible (white grey) | PLUME TYPE: CONTINUOUS ☑ INTERMITTENT ☐ FUGITIVE ☐
WATER DROPLETS PRESENT: NO ☒ YES ☐ | IF YES, IS PLUME: ATTACHED ☐ DETACHED ☐ N.A.
AT WHAT POINT WAS OPACITY DETERMINED: Rectangular Fan Exhaust ~2'x3' square
DESCRIBE BACKGROUND: Sky
BACKGROUND COLOR: Blue | SKY CONDITIONS: 5% Clouds (Horizon)
WIND SPEED: 10-15 MPH | WIND DIRECTION: Southeast
AMBIENT TEMPERATURE: 75° F | RELATIVE HUMIDITY: 65%
COMMENTS: Area Clean and Cleared. Fugitive Dust - Collected. Dust Collected in 55 gal drums.

SOURCE LAYOUT SKETCH — DRAW NORTH ARROW



OBSERVER'S SIGNATURE: H. J. Bauch P.E. | DATE: 2/29/84
VERIFIED BY:

OBSERVER NAME (PRINT): H.J. Bauch P.E.
ORGANIZATION: Southeast Environmental Consultants Inc
CERTIFIED BY: State of Fla - DER | DATE: 9/83

START TIME: 9:35 AM | STOP TIME: 10:05 AM

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27	0	0	0	0	57				
28	0	0	0	0	58				
29	0	0	0	0	59				
30	0	0	0	0	60				

AVERAGE OPACITY FOR FOR HIGHEST PERIOD: 0.00 | NUMBER OF READINGS ABOVE: 20 % WERE 0
RANGE OF OPACITY READINGS: 0% MINIMUM | 0% MAXIMUM

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS
SIGNATURE: | TITLE: | DATE:

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

AIR POLLUTION SOURCES
CERTIFICATE OF COMPLETION OF CONSTRUCTION*

PERMIT NO. AC13-41491 DATE: 6/20/83

Company Name: Cleveland Pneumatic product service Division, Inc. County: Dade

Source Identification(s): (2) Dust collectors, (1)Paint Spray Booth, (1) Vapor Degreaser, &(2)fume Scrubbers.

Actual costs of serving pollution control purpose: $ 89,000

Operating Rates: See attached Statement Design Capacity: See attachment Statement

Expected Normal See attached Statement During Compliance Test See attached Statement

Date of Compliance Test: 5/23/83 (Attach detailed test report) (Attached)

Test Results:	Pollutant	Actual Discharge	Allowed Discharge	
Shot Peen	TSP	0% opacity	20 %	
Paint Spray	TSP	0% opacity	20 %	
Sand Blast	TSP	2.29% opacity	20 %	***

Date plant placed in operation: 1982

This is to certify that, with the exception of deviations noted**, the construction of the project has been completed in accordance with the application to construct and Construction Permit No. AC13-41491 dated 1/13/82.

A. Applicant:

William F. Grun, Vice President
Name of Person Signing (Type)

Signature of Owner or Authorized Representative and Title

Date: 6/20/83 Telephone: 305 871-3420

B. Professional Engineer:

H. J. Bauch P.E.
Name of Person Signing (Type)

Signature of Professional Engineer

Southeast Environmental Consultants, Inc.
Company Name

Florida Registration No. 22011

Date: 6/20/83

(Seal)

10740 Hickory Ave. Pembroke Pines, Florida, 33026
Mailing Address

(305) 431-6849
Telephone Number

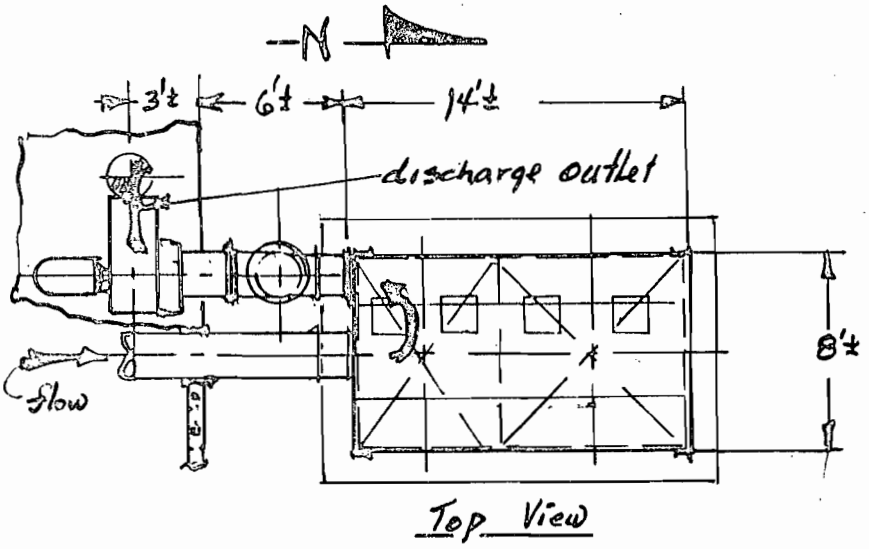
*This form, satisfactorily completed, submitted in conjunction with an existing application to construct permit and payment of application processing fee will be accepted in lieu of an application to operate.

**As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.

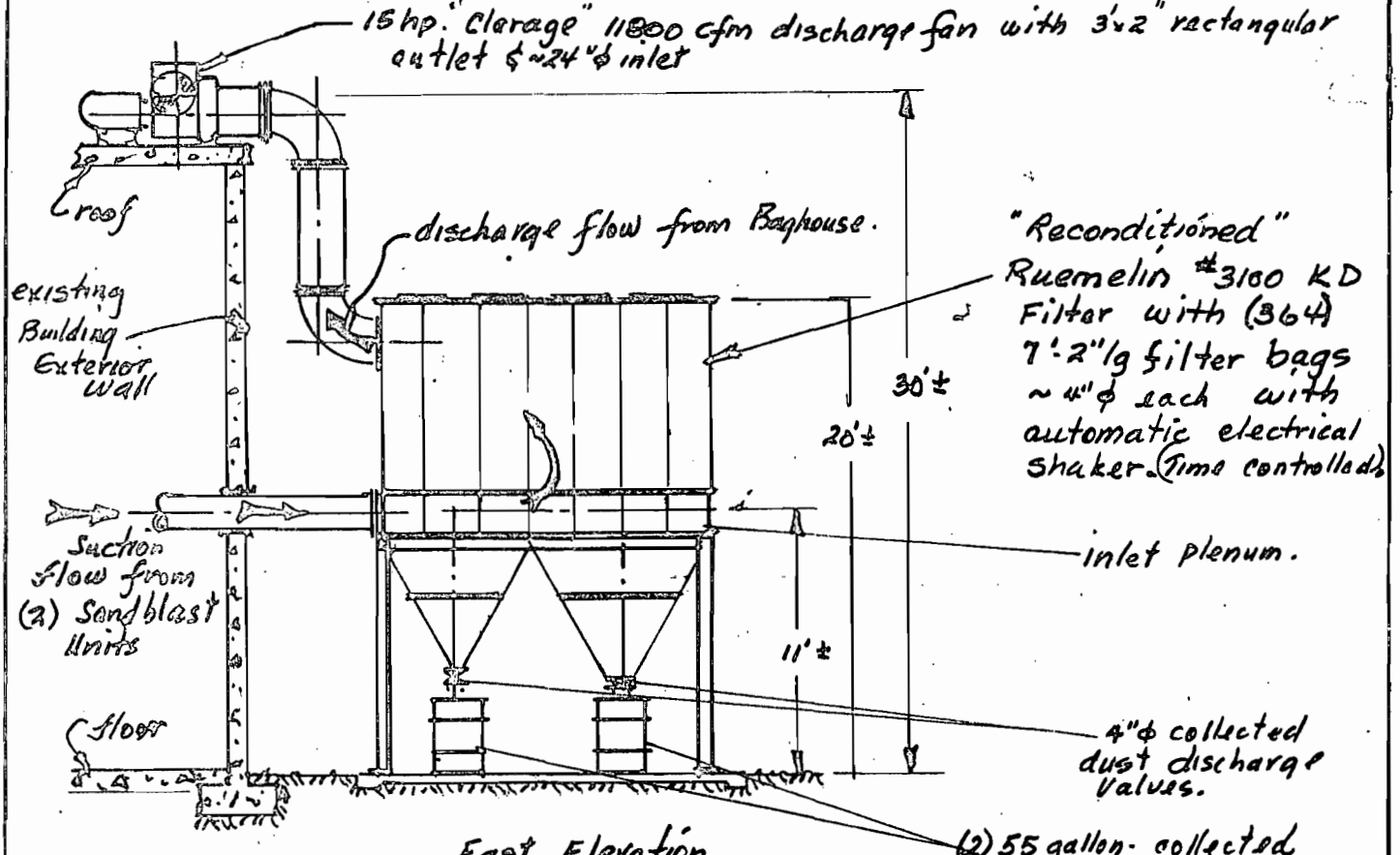
See attached revised application pages & drawings.

*** Indicates Test Results of present system. Modifications to improve are incomplete (See attachment #5). Will provide V.E. Test Results upon completion.

SOUTHEAST ENVIRONMENTAL CONSULTANTS, INC. ○ MANAGEMENT ○ ENGINEERING ○ TESTING	Cleveland Pneumatic Product Service Division, Inc. Attachment # 5 – Details of Sand Blast Dust Collector Modifications	4/16/83 Scale: 1/8" = 1'-0" KM.



Top View



East Elevation

Attachment #5-1

72755-7

Job. No. B-23126

FILTER NO. #3205

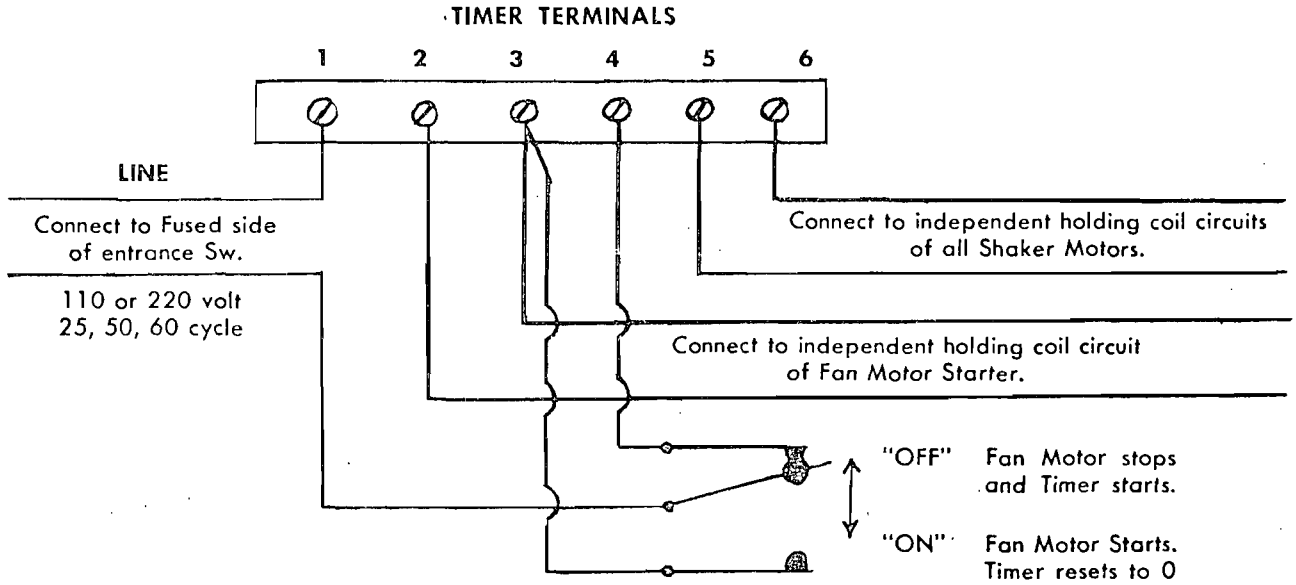
Dwg. No. 2362-L

ITEM	NUMBER FURNISHED	USE	REMARKS
3137-4A	—	Shaft Bearing End	1½" (R-305)
3137-23	—	Shaft Set Collar	1½"
3140-R	—	Shaker - Right Hand	_____ D.C.
3140-L	1	Shaker - Left Hand	Motor: 1 HP 440 V 3 PH 60 CY
3411-A	1	Shaft Bearing - Center	1½"
3435-4	13	Shaking pins	
3437-4	1	Shaft Bearing - Shaker End	1½"
Ø3580	370	Bag Hanging Rods	.204 x 10
Ø3790-B	2	Hanging Rod Bender	1/2" ø x 5½"
Ø3790-G	2	Slack Cage	3/8" ø x 2-7/8" I.D.
Ø16 x 5	375	Bag Fastening Wire	Ø16 x 5
Ø100	2	Bag Fastening Wire Twister	Ø100
BLO	364	Filter Bags - Long	7'-2"
BS	—	Filter Bags - Short	6'-8"
DV	2	Dust Valve	
63-10M	1	Automatic Shaker Timer	110 V ____ PH ___ CY
Ø9001	1	Automatic Shaker on/off Switch	
T-8	1	Transformer	110 PRIMARY 440 SECONDARY
SW-1	—	Shaker Motor Starting Switch	___ HP ___ V ___ PH ___ CY
SW-2	—	Fan Motor Starting Switch	___ HP ___ V ___ PH ___ CY
F1	1	Fan #3066 CLARAGE	11800 CFM 5" SP 1100 RPM
M2	1	Fan Motor	15 HP ___ V ___ PH ___ CY
Fd-2	1	Fan Drive	15 HP

Attachment #5-2

SIMPLIFIED WIRING PERMITS TIMER INSTALLATIONS ON NEW OR EXISTING COLLECTOR SYSTEMS. SPECIAL TIMERS TO ORDER.

(See wiring diagram #3410 for details.)



A-B Model RISC Rotary Switch included.

SHAKER MOTOR TIME DELAY CONTROLS

Model 63-10M-115	115V.	60C.	On/Off switch included	$	list
Model 63-10M-230	230V.	60C.	On/Off switch included	$	list
Model 63-10M-440	440V.	60C.	On/Off switch included	$	list

Prices do not include Motor Starters or Entrance Switches.
Prices on 25 Cycle or 50 Cycle on application. All Timers F.O.B. Milwaukee, Wisc.

AUXILIARY TIMER may be substituted for ON/OFF Switch shown above. When this is done, Fan Motor may be automatically stopped at pre-determined intervals within 4 hours, for Shaker Motor operation. Fan Motor and Shaker Motor operate on a repeating pre-set schedule while Dust Collecting System is in operation.

CYCLE REPEATING INTERVAL TIMER FOR FAN MOTOR

Model 63-ZRCO-115	115 or 230	volts. 60	cycle	$ list

Always Specify Operating Voltage and Cycle

OTHER RUEMELIN PRODUCTS:

- Sand Blast Cabinets
- Abrasive Handling Equipment
- Sand Blast Rooms
- Cloth Tube Dust Filters
- Compressed Air Dryers
- Welding Fume Collectors

Printed in U. S. A

RUEMELIN MANUFACTURING CO.
Mfrs. and Engineers, Sand Blast and Dust Collecting Equipment, Welding Fume Collectors
3860 N. PALMER STREET MILWAUKEE 12, WIS.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

ANNUAL OPERATIONS REPORT FORM FOR AIR EMISSIONS SOURCES

For each permitted emission point, please submit a separate report for calendar year 19 83 prior to March 1st of the following year.

I GENERAL INFORMATION

1. Source Name: Cleveland Pneumatic Product Service Division, Inc.
2. Permit Number: AC13-41491
3. Source Address: 6445 NW 25th Street (MIAD Building #2121)
   Miami, Florida 33152
4. Description of Source: Aircraft landing gear rebuilding facility

II OPERATING SCHEDULE: 24 hrs/day 7 days/wk 52 wks/yr

III RAW MATERIAL INPUT PROCESS WEIGHT:

Raw Material	Input Process Weight	
Trichloroethylene	24.25	tons/yr
Tolyolene & Thinner	4.02	tons/yr
Methyl Ethyl Ketone	6.81	tons/yr
Paint and Primer	0.60	tons/yr
		tons/yr

IV TOTAL FUEL USAGE, including standby fuels. If fuel is oil, specify type and sulfur content (e.g., No. 6 oil with 1 % S). - N.A.

_____ 10^6 cubic feet Natural Gas
_____ 10^3 gallons _____ Oil, _____ %S
_____ 10^3 gallons Propane
_____ 10^3 gallons Kerosene
_____ tons Coal
_____ 10^6 lb Black Liquid Solids
_____ tons Carbonaceous
_____ tons Refuse
Other (Specify type and units) _____

V EMISSION LEVEL (tons/yr):

A. 0.90* Particulates
_____ Sulfur Dioxide
_____ Total Reduced Sulfur
_____ Nitrogen Oxide
_____ Carbon Monoxide
_____ Fluoride
_____ Hydrocarbon
Other (Specify type and units) 35.57 T/yr. - V.O.C.**

B. Method of calculating emission rates (e.g., use of fuel and materials balance, emission factors drawn from AP 42, etc.)
*estimated from application rates for P.U. ** from Materials balance.

VI CERTIFICATION:

I hereby certify that the information given in this report is correct to the best of my knowledge.

William F. Grun
SIGNATURE OF OWNER OR AUTHORIZED REPRESENTATIVE

William F. Grun, Vice President
TYPED NAME AND TITLE

6/20/84
DATE

Cleveland Pneumatic (Dade Co - Miami Int'l Airport)

Review Eng's File Folder Xerox 2/9/82

Rec'd: 3/30/81 - West Palm Beach DER

April 29, 1981 - Incompleteness letter

July 9, 1981 - Already built! memo to file of sequences of events

July 20, 1981 - letter sent with amendment to application
Rec'd August 10, 1981

August 3, 1981 @ 1535 — Spoke to Rick Wilkey, P.E.
Requested: material balance per 100% solvent

August 31, 1981 @ 1528 — Spoke to Rick Wilkey, P.E.
Requested: material balance per 100% solvent
- potential incompleteness without info. -

September 1, 1981 Incompleteness letter sent
10/5/81 spoke with Rick Wilkey, Ira Goldman - West Palm, Tom Keith - West Palm
10/6/81 spoke with Dan Popes about Incompleteness
10/15/81 Rec'd. requested info.
10/20/81 PM Requested density of trichloroethylene of Dan Popes
10/21/81 @ 8:55 " " and monthly usage this year - Dan Popes

cc: Jim Williams, South Florida Subdistrict

Hugh P. Wong, c/o Dade County Environmental Resources Management -
909 SE First Ave.
Brickell Plaza Bldg., Rm. 402
Miami, Fla 33131

Dan Popes

July 9, 1981 - Already built! memo to file of sequences of events

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10/21/81 @ 8:55 " " and monthly usage this year. - Dan Propes

cc: Jim Williams, South Florida Subdistrict

Hugh P. Wong, c/o Dade County Environmental Resources Management - Air
909 SE First Ave.
Brickell Plaza Bldg., Rm. 402
Miami, Fla 33131

Dan Propes
c/o Cleveland Pneumatic Product Services Division, Inc
P.O. Box 52 0320, Bldg. 2121
MIAD
Miami, Fla 33152

To Tom Mueller

Date 7/7 Time 3:55

WHILE YOU WERE OUT

M. Rick Wilbe

of Envright Assoc

Phone 803/288-5190
Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
	RETURNED YOUR CALL		

Message Re: Cleveland Pneumatic — Drier, Inter. Airport. Call before 5:30.

Phillis
Operator

Best Available Copy

Spoke w/ R.W @ 1528, 8/31/81,
He said that the material balance would be sent by the end of the week. (SD)
pgm

14 → SD

Fla Reclaiming
6491 SW 42nd Ter
33155
305/661-6158

Dan Proffer

11:11 11/4/81

Bruce Mitchell

Specific Gravity of Trichlore Ethelene
1.46 25/25

Month of May
550 gal.
June
250 gal.
July
300 gal.
August
200 gal.
Sept
250. gal 11/2/81
so far → Oct (250)
150 gal +100 →

May - 6,721 lb.
June 3,055
July - 3,660
Aug. - 2,444
Sept. - 3,055
Oct. - 1,833

Wt Per gal of trichlorol Ethylene
12.22

17-2.16(6)(ℓ) Solvent Metal Cleaning -

1. Applicability

a. The emission limiting standards and control technology set forth in 17-2.16(6)(l) shall apply to cold cleaning, open-top vapor degreasing, and conveyorized degreasing operations.

b. The provisions of 17-2.16(6)(l) shall apply with the following exceptions:

(i) Open-top vapor degreasers with an open area smaller than 10.8 square feet (one square meter) shall be exempt from 17-2.16(6)(l) 3.c.,

(ii) Conveyorized degreasers with an air/vapor interface smaller than 21.5 square feet (2.0 square meters) shall be exempt from 17-2.16(6)(l)4.b.

3. Open Top Vapor Degreaser Control Technology

Except as provided under 17-2.16(6)(l), the owner or operator of an open top vapor degreaser shall comply with each of the following requirements:

a. Equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone.

b. Provide the following safety switches:

(i) A condenser flow switch and thermostat which shut off the heat if the condenser coolant is either not circulating or too warm; and,

(ii) A spray safety switch which shuts off the spray pump if the vapor level drops more than 4 inches (10 centimeters) below the bottom condenser coil; and,

(iii) A vapor level control thermostat which shuts off the heat when the vapor level rises too high.

c. Install one of the following control devices:

(i) A freeboard ratio greater than or equal to 0.75, and a powered or mechanically assisted cover if the degreaser opening is greater than 10.8 square feet (1.0 square meter); or,

(ii) Refrigerated chiller; or,

(iii) An enclosed design (cover or door opens only when the dry part is actually entering or exiting the degreaser); or,

(iv) A carbon adsorption system, with ventilation greater than or equal to 50 cubic feet per minute per square

foot (15 cubic meters per minute per square meter) of air/vapor area (when cover is open), and exhausting less than 25 parts per million of solvent averaged over one complete adsorption cycle.

d. Keep the cover closed at all times except when processing work loads through the degreaser.

e. Minimize solvent carryout by:

(i) Racking parts to allow complete drainage; and,

(ii) Moving parts in and out of the degreaser at less than 11 feet per minute (3.3 meters per minute); and,

(iii) Holding the parts in the vapor zone at least 30 seconds or until condensation ceases; and,

(iv) Decanting any pools of solvent on the cleaned parts before removal from the vapor zone; and,

(v) Allowing parts to dry within the degreaser for at least 15 seconds or until visually dry.

f. Not degrease porous or absorbent materials, such as cloth, leather, wood, or rope.

g. Not occupy more than half of the degreaser's open-top area with a workload.

h. Not load the degreaser to the point where the vapor level would drop more than 4 inches (10 centimeters) below the bottom condenser coil when the workload is removed from the vapor zone.

i. Always spray below the vapor level.

j. Repair solvent leaks immediately, or shut down the degreaser.

k. Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.

l. Not operate the cleaner so as to allow water to be visually detectable in solvent exiting the water separator.

m. Not use ventilation fans near the degreaser opening, nor provide exhaust ventilation exceeding 66 cubic feet per minute per square foot (20 cubic meters per minute per square meter) of degreaser open area, unless necessary to meet OSHA requirements.

n. Provide a permanent, conspicuous label, summarizing the operating procedure of 17-2.16(6)(1)3.d. through 3.1.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: File - Cleveland Pneumatic Product Service Division, Inc. AC 13-41491

FROM: Bill Thomas

DATE: January 12, 1982

SUBJ: Response to Comments from DER South Florida Subdistrict regarding Preliminary Determination and Intent to Issue above permit.

Comments will be addressed in the order presented.

General Comments

1. Since the complete application was received prior to November 1, 1981, the review was conducted under the rule in effect at that time. Conflicts in issuance of the operation permit should not arise since the operation permit is to allow operation in accordance with the permitted construction of the plant. EPA has held that, in order to be federally enforceable, substantive amendments to any permit which could affect the S.I.P. must be reflected in the construction permit.

2.a. Potential emission definitions are not pertinent since limits are set by design and work practices.

b. No sampling test method is applicable. Compliance is determined by adherence to work practices and indicated by materials balance on solvent usage.

c. See discussion of General Comment 1.

3. Changes made as required.

4. AP42 may not be accurate in all cases but forms the best surrogate standard available as an indication of adherence to required work practices.

5. Changes made as requested.

6. See #4.

7. See #4.

8. DER Method 9 is called out in Specific Condition #3 and #5b.

9. Addition made as requested.

10. The plot plan was submitted. The stack information was incompatible and thereby insufficient although not ground for incompleteness. Since it did not influence the review, it was not made an issue.

11. See Specific Condition #2.

Specific Condition Comments

1. Deleted and incorporated by imposing Specific Condition #4.

2. Revision was done with "control" deleted. See Specific Condition #2.

3. As requested.

4-17. As requested.

18. Deleted as requested and "as designed" was incorporated in Specific Conditions #3 and 5.

19. As requested.

20. "No external discharge" shall be imposed on the sand-blasting operation.

21. As requested.

22. As requested.

23. As requested.

24. Deleted.

25. Specific Condition #7 was written to preclude operation without a currently valid permit during the interval between completion of acceptance testing and issuance of an operation permit. In accordance with Chapter 120 F.S. the issuance could take up to 90 days.

BT:caa

cc: Tom Tittle
Jim Williams
Attachment #7, AC13-41491

AP-42 excerpt

any other plant operations. In these cases, purchase records provide the necessary information, and an emission factor of 1,000 kg of volatile organic emissions per metric ton of solvent purchased can be applied (Table 4.6-1). This factor is based on the assumption that all solvent purchased is eventually emitted. When information on solvent consumption is not available, emission rates can be estimated if the number and type of degreasing units are known. The [illegible] and emission of [illegible] can be estimated by [illegible].

The expected effectiveness of various control devices and procedures is listed in Table 4.6-2. As a first approximation, this efficiency can be applied without regard for the specific solvent being used. However, efficiencies are generally higher for more volatile solvents. These solvents also result in higher emission rates than those computed from the "average" factors listed in Table 4.6-1.

Table 4.6-1. SOLVENT LOSS EMISSION FACTORS FOR DEGREASING OPERATIONS
EMISSION FACTOR RATING: C

Type of degreasing	Activity measure	Uncontrolled organic emission factor[a]	
All[b]	Solvent consumed	2,000 lb/ton	1,000 kg/MT
Cold cleaner			
Entire unit[c]	Units in operation	0.33 tons/yr·unit	0.30 MT/yr·unit
Waste solvent loss		0.18 tons/yr·unit	0.165 MT/yr·unit
Solvent carryout		0.08 tons/yr·unit	0.075 MT/yr·unit
Bath and spray evaporation		0.07 tons/yr·unit	0.060 MT/yr·unit
Entire unit	Surface area and duty cycle[d]	0.08 lb/hr·ft²	0.4 kg/hr·m²
Open top vapor			
Entire unit	Units in operation	10.5 tons/yr·unit	9.5 MT/yr·unit
Entire unit	Surface area and duty cycle[e]	0.15 lb/hr·ft²	0.7 kg/hr·m²
Conveyorized, vapor			
Entire unit	Units in operation	26 tons/yr·unit	24 MT/yr·unit
Conveyorized, nonboiling			
Entire unit	Units in operation	52 tons/yr·unit	47 MT/yr·unit

[a]100% nonmethane hydrocarbons or volatile organic compounds.

[b]Solvent consumption data will provide much more accurate emission estimates than any of the other factors presented.

[c]Emissions would generally be higher for manufacturing units and lower for maintenance units.

[d]For trichloroethane degreaser. From Reference 3, Appendix C-6.

[e]For trichloroethane degreaser. Does not include waste solvent losses.

Table 4.6-2. PROJECTED EMISSION REDUCTION FACTORS FOR SOLVENT DEGREASING[a]

System	Cold cleaner		Vapor degreaser		Conveyorized degreaser	
	A	B	C	D	E	F
Control devices						
Cover or enclosed design	X	X	X	X	X	X
Drainage facility	X	X	X			X
Water cover, refrigerated chiller, carbon adsorption or high freeboard[b]		X		X		X
Solid, fluid spray stream[c]						
Safety switches and thermostats				X		X
Emission reduction from control devices (%)	13-38	NA[e]	20-40	30-60		40-60
Operating procedures						
Proper use of equipment	X	X	X	X	X	X
Use of high volatility solvent		X				
Waste solvent reclamation	X	X	X	X	X	X
Reduced exhaust ventilation			X	X	X	X
Reduced conveyor or entry speed			X	X	X	X
Emission reduction from operating procedures (%)	15-45	NA[e]	15-35	20-40	20-30	20-30
Total emission reduction (percentage)	28-83[d]	55-69[f]	30-60	45-75	20-30	50-70

[a]Reference 2. Ranges of emission reduction present poor to excellent compliance. X indicates devices or procedures which will effect the given reductions.

[b]Only one of these major control devices would be used in any degreasing system. System B could employ any of them; system D could employ any except water cover; system F could employ any except water cover and high freeboard.

[c]If agitation by spraying is used, the spray should not be a shower type.

[d]A manual or mechanically assisted cover would contribute 6-18% reduction; draining parts 15 seconds within the degreaser, 7-20%; and storing waste solvent in containers, an additional 15-45%.

[e]Breakout between control equipment and operating procedures is not available.

[f]Percentages represent average compliance.

4.6.1.3 Conveyorized Degreasers – Conveyorized degreasers may operate with either cold or vaporized solvent, but they merit separate consideration because they are continuously loaded and are almost always hooded or enclosed. About 85 percent are vapor types, and 15 percent are nonboiling.

4.6.2 Emissions and Controls[1,2,3]

Emissions from cold cleaners occur through (1) waste solvent evaporation, (2) solvent carry-out (evaporation from wet parts), (3) solvent bath evaporation, (4) spray evaporation, and (5) agitation (Figure 4.6-1). Waste solvent loss, cold cleaning's greatest emission source, can be minimized through distillation

State of Florida

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee

To: Bill Thomas Loctn.:

To: Loctn.:

To: Loctn.:

From: Date:

TO: Bruce Mitchell, Bureau of Air Quality Management, Tallahasee

FROM: Tom Tittle/Jim Williams - DER, West Palm Beach

DATE: December 9, 1981

SUBJECT: Cleveland Pneumatic Product Service Division Application to Construct a Degreasing and Plating Facility (AC13-41491) Intent To Issue

The following comments are resubmitted, in accordance with your request, for consideration in terms of Chapter 17-2 prior to November 1, 1981:

GENERAL COMMENTS:

1. We understand that the construction application was reviewed initially in accordance with Chapter 17-2 as it was effective prior to November 1, 1981. Further, it is now our understanding that permits should be issued in accordance with the rules as they exist at the time the permit application is complete. In accordance with General Condition 7. of the permit, this office will have to review the operation permit application in light of Chapter 17-2 as it exists at the time the application to operate is complete. We will be addressing our concerns regarding rule change effects (as indicated in General Comment #2 and Specific Condition Comment #24) at that time. We feel that any conflicts between the old and new rule should be ommitted from the permit wherever possible and the applicant should at least be informed that revisions have been made to the rules which may affect him.

2. Reorganization of the rule has resulted in the following changes (to name a few) which may be pertinent to the eventual issuance of an operation permit:

a. Potential emissions are now based on design emissions rather than uncontrolled emissions.

b. No test method is specified (as required) in Section 17-2.700, Table 1, Florida Administrative Code, for unconfined emissions regulated by Section 17-2.610(3), Florida Administrative Code.

Initial operation permit to be issued on DC

DEC 1981 BUREAU A Q M

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DUE DATE

		INITIAL	DATE
1.	TO: (NAME, OFFICE, LOCATION) Clair Fancy Bruce Bill		
2.	Bureau of Air Qual. Mgmt.		
3.	DER-Tallahassee		
4.			

REMARKS:

Clarified Permit

CAPS

file

TO FILE

JP

INFORMATION
- REVIEW & RETURN
- REVIEW & FILE
- INITIAL & FORWARD

DISPOSITION
- REVIEW & RESPOND
- PREPARE RESPONSE
- FOR MY SIGNATURE
- FOR YOUR SIGNATURE
- LET'S DISCUSS
- SET UP MEETING
- INVESTIGATE & REPS
- INITIAL & FORWARD
- DISTRIBUTE
- CONCURRENCE
- FOR PROCESSING
- INITIAL & RETURN

FROM: Jan Nubaca

DATE 12-9-81

PHONE

c. The Limited New Source Review Exemption of Section 17-2.510(3)(a)1.a.(ii), Florida Administrative Code, requires permitting in accordance with Section 17-2.510(4), Florida Administrative Code. Prior to November 1, 1981, the rule required the most stringent of the following: 17-2.05 (now 17-2.600, 17-2.610 and 17-2.620), 17-2.13 (now 17-2.650(2)) and 17-2.16 (now 17-2.650(1)). In the present rule, 17-2.610 and 17-2.620 are no longer required by 17-2.510(4). The result of this deletion is that sources whose non-attainment pollutants are subject to the Limited NSR Exemption are no longer required to comply with: Process Weight Table, General Visible Emissions Standard, Fugitive Emission Provisions and the General Pollutant Emission Limiting Standards for VOC's and objectional odor.

Complete Appl. Oct 15

3. Greater care should be used when using the terms "de minimus" and "no visible emissions". "De minimus" is only found in the air rule effective after November 1, 1981, in reference to Table 500-3; and the 15 ton/year particulate level is an emissions cutoff level found in Section 17-2.17, Table II. Several statements in the review and the proposed permit refer to "0% opacity" and "no visible emissions". The two are not synonymous. Section 17-2.01 defines "visible emissions" as an emission greater than 5% opacity. Thus a 4% opacity meets the no visible emission criteria but not the 0% opacity criteria.

yes

4. The AP-42 emission factors used as a basis for an emission limiting standard may be considerably in error when applied to one particular unit (see AP-42 reference enclosed).

N/A — Surrogate

5. To insure particulate and unconfined emissions remain insignificant the permit imposes emission limiting standards. We are aware of no rule which authorizes such standards to be imposed although Section 17-4.23(b), Florida Administrative Code, allows the best available "technology" to be required.

yes agree

6. To insure that VOC emissions remain below "estimated" emissions (when equipped and operated in accordance with the appropriate regulations), the permit imposes emission limiting standards. Again we see no basis in the rules for an emission limiting standard for these sources. Sections 17-4.23(b) and 17-2.05(5), Florida Administrative Code, only require "control devices or systems" deemed necessary and ordered by the Department (note general comment 2(c) as well).

ck cite

7. Assurance that a source's emissions will remain controlled as designed is provided by Section 17-2.05(12), Florida Administrative Code, which precludes circumvention and requires proper operation of controls.

not use. w/mass balance

8. The permit is not clear as to what test method is required for visible emissions (DER or EPA Method 9?).

yes

re #6 — Since circum is covered specifically in rule (no case specific interp) it is unk. whether or not in permit. — However becomes academic w/ daily usage rpt.

9. The UTM zone 17 is not specified. It should be stated for clarity since Florida falls into zones 16 and 17.

10. The following information in the application is deficient:
   (a) Stack height above ground level is not given. (Section III H.)
   (b) Flow, stack diameter and velocity are not compatible. Which are correct? (Section III H.)
   (c) Plot plans of the facility and facility location were not submitted.

11. If an emission limitation in lbs/hour is going to be specified as in specific conditions #20, 21 and 22, then the test method for determining compliance also needs to be specified.

SPECIFIC CONDITION COMMENTS

1. Pursuant to General Comment #6, we feel that proviso #1 should be deleted.

2. Accurate record keeping and submittal of annual operation reports do not "control" VOC's. The annual operation reports, DER Form 17-1.122(44), which are required to be submitted on or before March 1st of each year can be useful in accounting for actual emissions. We request that proviso #2 be revised accordingly.

3. We suggest that the word "properly" be changed to "as designed" in proviso #3.

4 to 17. We suggest that these provisos be replaced by a single proviso which states that the vapor degreaser and its operation, must comply with Section 17-2.16(6)(l)3., Florida Administrative Code and include Section 17-2.16(6)(l)3., Florida Administrative Code as an attachment to the permit.

18. Unenforceable permit condition. We suggest that this proviso be worded similarily to proviso #3 after changing the word "properly" to "as designed".

19. See General Comment #3. We feel that the process weight table is not applicable to these sources. We suggest that this proviso be revised to inform the applicant that the shot peen and sandblasting process will be limited to visible emissions of less than 20% opacity in accordance with Section 17-2.05(1), Florida Administrative Code.

20. See Specific Condition Comment #19. Although the sandblasting operation is enclosed, we feel the only emission limiting standard that could be applied is the Visible Emission Standard of Section 17-2.05(1).

21. See Specific Condition Comment #19.

22. See General Comment #5. We feel that the only applicable emission limitation is the Visible Emission Standard of Section 17-2.05(1).

23. Thirty (30) days is a bit long for V. E. test scheduling. We suggest ten (10) days or so is more reasonable.

24. See General Comments #2(b) and #5 and Specific Condition Comment #2. In addition, this proviso implies that visible emission testing for compliance will be provided by the Department. Compliance "testing" is the applicant's responsibility. NOTE: If visible emissions testing is applied to fugitive emissions then the 20% opacity limitation may or may not result in reasonable precaution as required by the new rule (post November 1, 1981). According to Mary Clark, the fugitive emission rule prior to November 1, 1981 was unconstitutionally vague and not to be used in the proposed manner.

See screen up in Dade

25. Test results should be submitted with the operation permit application or certificate of completion in accordance with the instructions given on these approved forms. "Full" operation of this facility should not be stated as permissible in the permit in that this would seem to be in conflict with Section 17-4.21(3), Florida Administrative Code.

N/A

In addition to the above, we feel the applicant should be advised either in the permit or by separate letter that the sludges from the wastewater treatment line and probably the degreaser are hazardous waste and must be disposed of accordingly.

If you have any questions on the above please contact Tom Tittle of this office at SUNCOM 451-5005.

JW:TT:jh

Enclosure

cc: Clair Fancy
Marshall Mott-Smith

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee
To: Clair Fancy Loctn.:
To: Loctn.:
To: Loctn.:
From: Date:

TO: Bill Thomas, Bureau of Air Quality Management, Tallahasee

FROM: Tom Tittle/Jim Williams for Duke - DER, West Palm Beach

DATE: December 1, 1981

SUBJECT: Cleveland Pneumatic Product Service Division Application to Construct a Degreasing and Plating Facility (AC13-41491) Intent To Issue

The following comments are submitted for your consideration:

GENERAL COMMENTS:

1. The application was understandably reviewed initially in accordance with Chapter 17-2 as it was effective prior to November 1, 1981. However, it is our understanding that permits should be issued in accordance with the rules as they exist at the time of permit issuance.

not according to Marti Hall

2. Reorganization of the rule has resulted in the following changes (to name a few) which are pertinent to the review of this application.

a. Potential emissions are now based on design emissions rather than uncontrolled emissions.

true →

b. No test method is specified (as required) in Section 17-2.700, Table 1, Florida Administrative Code, for unconfined emissions regulated by Section 17-2.610(3), Florida Administrative Code.

only an inspection Right?

c. The Limited New Source Review Exemption of Section 17-2.510(3)(a)1.a.(ii), Florida Administrative Code, requires permitting in accordance with Section 17-2.510(4), Florida Administrative Code. Prior to November 1, 1981, the rule required the most stringent of the following: 17-2.05 (now 17-2.600, 17-2.610 and 17-2.620), 17-2.13 (now 17-2.650(2)) and 17-2.16 (now 17-2.650(1)). In the present rule, 17-2.610 and 17-2.620 are no longer required by 17-2.510(4). The result of this deletion is that sources whose non-attainment pollutants are subject to the Limited NSR Exemption are no longer required to comply with: Process Weight Table, General Visible EmissionsStandard, Fugitive Emission Provisions and the General Pollutant Emission Limiting Standards for VOC's and objectional odor.

3. Greater care should be used when using the terms "de minimus" and "no visible emissions". "De minimus" is only found in reference to Table 500-3; and the 15 ton/year particulate level is an emissions cutoff level found in Section 17-2.510, Table II. Several statements in the review and the proposed permit refer to "0% opacity" and "no visible emissions". The two are not synonymous. Section 17-2.100(174) defines visible emissions as an emission greater than 5% opacity. Thus a 4% opacity meets the no visible emission criteria but not the 0% opacity criteria.

true →

4. The AP-42 emission factors used as a basis for an emission limiting standard may be considerably in error when applied to one particular unit (see AP-42 reference enclosed).

5. To insure particulate and unconfined emissions remain insignificant the permit imposes emission limiting standards. We are aware of no rule which authorizes such standards to be imposed although Section 17-4.23(b), Florida Administrative Code, allows the best available "technology" to be required.

that is a void rule →

6. To insure that VOC emissions remain below "estimated" emissions (when equipped and operated in accordance with the appropriate regulations), the permit imposes emission limiting standards. Again we see no basis in the rules for an emission limiting standard for these sources. Sections 17-4.23(b) and 17-2.620(2), Florida Administrative Code, only require "control devices or systems" deemed necessary and ordered by the Department (note general comment 2(c) as well).

equipment spec is std

7. Assurance that a source's emissions will remain controlled as designed is provided by Section 17-2.240, Florida Administrative Code, which precludes circumvention and requires proper operation of controls.

8. The permit is not clear as to what test method is required for visible emissions (DER or EPA Method 9?).

9. The UTM zone 17 is not specified. It should be stated for clarity since Florida falls into zones 16 and 17.

10. The following information in the application is deficient:

Should have been included

(a) Stack height above ground level is not given. (Section III H.)
(b) Flow, stack diameter and velocity are not compatible. Which are correct? (Section III H.)
(c) Plot plans of the facility and facility location were not submitted.

11. If an emission limitation in lbs/hour is going to be specified as in specific conditions #20, 21 and 22, then the test method for determining compliance also needs to be specified.

true

SPECIFIC CONDITION COMMENTS

1. Pursuant to General Comment #6, we feel that proviso #1 should be deleted.

2. Accurate record keeping and submittal of annual operation reports do not "control" VOC's. The annual operation reports, DER Form 17-1.122(44), which are required to be submitted on or before March 1st of each year can be useful in accounting for actual emissions. We request that proviso #2 be revised accordingly.

3. We suggest that the word "properly" be changed to "as designed" in proviso #3.

4 to 17. We suggest that these provisos be replaced by a single proviso which states that the vapor degreaser and its operation, must comply with Section 17-2.650(1)(f)12.c., Florida Administrative Code and include Section 17-2.650(1)(f)12.c., Florida Administrative Code as an attachment to the permit.

one way to do it.

18. Unenforceable permit condition. We suggest that this proviso be worded similarily to proviso #3 after changing the word "properly" to "as designed".

19. See General Comment #3. We feel that the process weight table is not applicable to these sources. We suggest that this proviso be revised to inform the applicant that the shot peen and sandblasting process will be limited to visible emissions of less than 20% opacity in accordance with Section 17-2.610(2), Florida Administrative Code, General Visible Emissions Standard.

I would agree

20. See Specific Condition Comment #19. Although the sandblasting operation is enclosed, we feel the only emission limiting standard that could be applied is the General Visible Emission Standard.

Unfortunately true

21. See Specific Condition Comment #19.

22. See General Comment #5. We feel that the only applicable emission limitation is the General Visible Emission Standard.

23. Thirty (30) days is a bit long for V. E. test scheduling. We suggest ten (10) days or so is more reasonable.

24. See General Comments #2(b) and #5 and Specific Condition Comment #2. In addition, this proviso implies that visible emission testing for compliance will be provided by the Department. Compliance testing is the applicant's responsibility. If visible emissions testing is applied to fugitive emissions then the 20% opacity limitation may or may not result in reasonable precaution as required by the rule.

25. Test results should be submitted with the operation permit application or certificate of completion in accordance with the instructions given on these approved forms. "Full" operation of this facility should not be stated as permissible in the permit in that this would seem to be in conflict with Section 17-4.21(3), Florida Administrative Code.

In addition to the above, we feel the applicant should be advised either in the permit or by separate letter that the sludges from the wastewater treatment line and probably the degreaser are hazardous waste and must be disposed of accordingly. See G.C. #11

If you have any questions on the above please contact Tom Tittle of this office at SUNCOM 451-5005.

JW:TT:jh

Enclosure

cc: Clair Fancy
Marshall Mott-Smith

The district can handle this when they issue operating permit.

Cleveland Pneumatic
Landing Gear

Product Service Division, Inc.
P.O. Box 520320
Miami, Fla. 33152

Pneumo

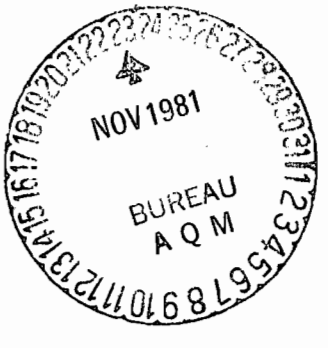
November 17, 1981

Department of Environmental Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Dear Bruce Mitchel:

Here is the information that you requested on our trichloroethylene. If I can be of any help please call me at 305-871-3428.

Sincerely,
William D. Propes
William D. Propes



305 | 871-3420 | TLX 80-8114 | TWX 810 848 4153

MATERIAL SAFETY DATA SHEET

(APPROVED BY THE U.S. DEPARTMENT OF LABOR AS—"essentially similar" to form OSHA-20)

FORM No. 100-5463-75

● Section 1—NAME & PRODUCT

Manufacturer's Name	City, State and Zip Code	Emergency Phone No. 24 hours
DOW CHEMICAL U.S.A.	Midland, Michigan 48640	517-636-4400

Date this form written: January 30, 1975

INORGANIC CHEMICALS DEPARTMENT

Trade Name: NEU-TRI* solvent

Synonyms:

● Section 2—INGREDIENTS—TYPICAL VALUES

	WT. %
Trichloroethylene (minimum)	95

● Section 3—PHYSICAL DATA

BOILING POINT (°F.)	189°F (87°C)	SOLUBILITY IN WATER	0.1 gm/100 gm at 25°C
VAPOR PRESSURE (mm Hg at 20°C)	60	SPECIFIC GRAVITY (H_2O : 1)	1.46 at 25/25°C
VAPOR DENSITY (air : 1)	4.53	% VOLATILE BY VOLUME	100 (Essentially)

APPEARANCE: Colorless liquid

● Section 4—FIRE AND EXPLOSION HAZARD DATA

Flash Point (and method used): None °F

Flammable Limits (STP in air)—Vol. % at 25°C: L.F.L. 8.0 U.F.L. 10.5

EXTINGUISHING MEDIA: [X] Water Fog [ ] Foam [ ] Alcohol Foam [ ] CO_2 [ ] Dry Chemical [ ] Other

Special Fire Fighting Protection Equipment and Hazards

Self-contained respiratory protection. Strong unpleasant odor. Not considered a flammable liquid hazard under normal industrial use conditions.

● Section 5—REACTIVITY DATA

STABILITY (Normal Conditions)			
X	STABLE		UNSTABLE

Conditions to avoid: Open flames, welding arcs or other high temperature sources which induce thermal decomposition.

INCOMPATIBILITY

Materials to avoid: [ ] Water [ ] Acid [X]* Base [ ] Corrosive [ ] Oxidizing Material

Other [ ]

*Strong bases: Caustic soda, caustic potash.

Hazardous Decomposition Products: Hydrogen chloride and very small amounts of phosgene & chlorine.

HAZARDOUS POLYMERIZATION			Conditions to avoid
		MAY OCCUR	
	X	WILL NOT OCCUR	

● Section 6—SPILL OR LEAK PROCEDURES—USE PROPER PROTECTIVE EQUIPMENT

Steps to be taken in case material is released or spilled

Small spills: Mop up, wipe up or soak up immediately. Remove to out of doors.

Large spills: Evacuate area. Contain liquid; transfer to closed metal containers. Keep out of water supply.

Disposal Method: Send solvent to a reclaimer. In some cases it can be transported to an area where it can be placed on the ground and allowed to evaporate safely. Refer to Chemical Safety Data Sheet SD-14, Manufacturing Chemists Association, 1825 Connecticut Avenue, Washington, D.C. 20009.

MEC-TRI solvent

MATERIAL SAFETY DATA SHEET (Continued)

● Section 7—HEALTH HAZARD DATA

Ingestion

Lethal dose for a 150 pound person is estimated to be in the range of 5 to 30 ml. or one teaspoonful to one ounce.

Eye Contact

Pain and irritation, but no (or only minor) corneal injury likely.

Skin Contact

Short contact – no irritation. Prolonged or repeated contact – irritation may occur. If confined to skin – pain and a burn.

Skin Absorption

Very low; not a hazard.

Inhalation

TLV: 100 ppm (1974)

Effects of Overexposure

Anesthesia. Chronic exposures to level over 100 ppm – possible organic injury.

FIRST AID PROCEDURE

EYES AND SKIN: Flush with plenty of water and get medical attention.
INHALATION: If illness occurs, get patient to fresh air, keep him quiet and warm and get a physician. If breathing stops, start artificial respiration.
INGESTION: Induce vomiting. Call a physician immediately.*
CAUTION: With some solvents, drinking alcohol shortly before, during or after exposure may cause undesirable effects.

CAUTION: Never give fluids or induce vomiting if patient is unconscious or having convulsions

● Section 8—SPECIAL PROTECTION INFORMATION

Ventilation

Limit concentration in air to TLV.

Respiratory Protection Below 100 ppm – None. Respiratory protection required in the absence of environmental control. For levels up to 2% for 1/2 hour or less, a suitable full-face mask with organic canister should be used. Above 2 per cent and for emergencies, use a self-contained breathing apparatus.

Protective Clothing

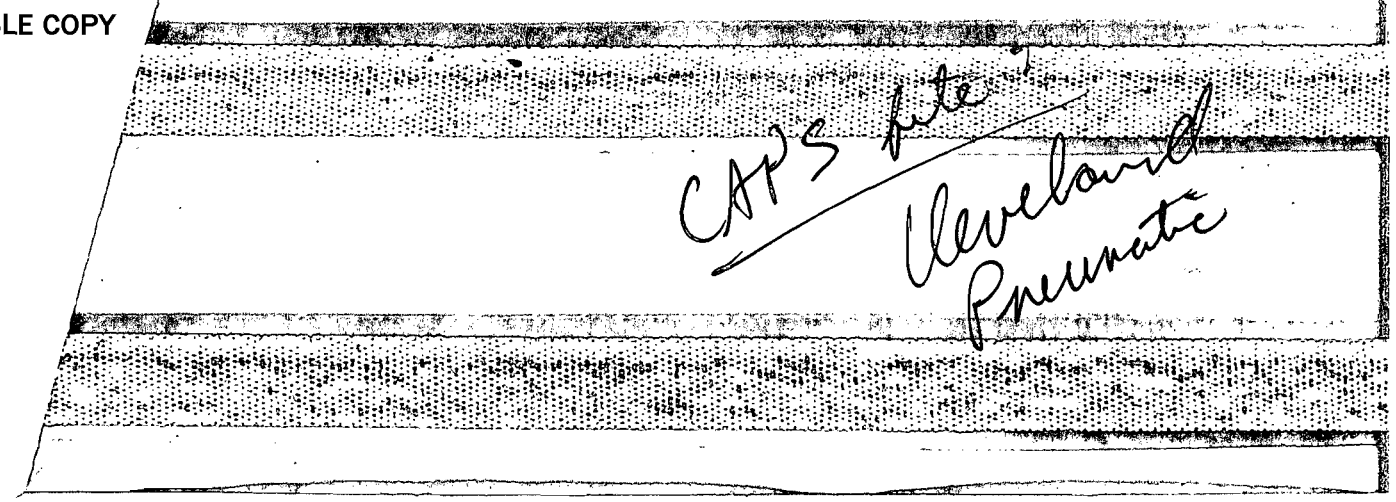
No special protective clothing needed.

EYE PROTECTION				
	☐ Not normally necessary	☐ Safety glasses with side shields	☒ Safety glasses without side shields	☐ Chemical workers' goggles
	☐ Gas tight goggles or equivalent	☒ Other Eye wash stations and safety showers should be readily available.		

● Section 9—SPECIAL PRECAUTIONS OR OTHER COMMENTS

Handle with reasonable care. Avoid breathing vapors. Store in cool place.

*NOTE TO PHYSICIAN: Overexposure to many of the chlorinated solvents, especially if accompanied by anoxia, may temporarily increase cardiac irritability. Maintain adequate oxygenation until recovery. Avoid sympatomimetic amines, such as epinephrine, which may precipitate arrhythmias.



The Miami Herald
A KNIGHT-RIDDER NEWSPAPER

PUBLISHED DAILY
MIAMI — DADE — FLORIDA

STATE OF FLORIDA
COUNTY OF DADE:

Before the undersigned authority personally appeared

Eddie L. Sweet

who on oath says that he/she is

Front Office Manager

of The Miami Herald, a daily newspaper published at Miami in Dade County, Florida; that the attached copy of advertisement was published in said newspaper in the issues of

Nov. 6, 1981

PUBLIC NOTICE
The Florida Department of Environmental Regulation (DER) has received an application from and intend to issue a Construction permit to Cleveland Pneumatic Product Service Division for the construction of a metal plating facility to be located at Miami International Airport, in Dade County, Florida. A determination of Best Available Control Technology was not required. Copies of the Application, Technical Evaluation, and Departmental Intent are Available for inspection at the following office:

FDER, South Florida Subdistrict
Dept of Environmental Regulation
2745 SE Morningside Blvd
Port St Lucie, Florida 33452

Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dade County Department of Environmental Resources Management
515 West 6th Street
Jacksonville, Florida 32206

Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee Office within 30 days of this notice.
Nov 2, 1981
Ad NO187732R

Affiant further says that the said The Miami Herald is a newspaper published at Miami, in the said Dade County, Florida and that the said newspaper has heretofore been continuously published in said Dade County, Florida, each day and has been entered as second class mail matter at the post office in Miami, in said Dade County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

E L Sweet

Sworn to and subscribed before me this 9th day of Nov. A.D. 19 81

Margaret Ford Marcone

My commission expires NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES AUG. 17 1983
BONDED THRU GENERAL INS. UNDERWRITERS

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____ Loctn.: _____		
To: _____ Loctn.: _____		
To: _____ Loctn.: _____		
From: _____ Date: _____		
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: File - Cleveland Pneumatic

FROM: Bruce Mitchell via telephone call from Dan Propes with Cleveland Pneumatic

DATE: November 4, 1981

SUBJ: Reclaiming of VOC's (Volatile Organic Carbons)

Mr. Propes said that the following company was reclaiming the used trichloroethylene.

Florida Reclaiming
6491 SW 42nd Terrace
Miami, Florida 33155
Phone Number: (305) 661-6158

BM/bjm

cc: Dan Propes - Cleveland Pneumatic
Hugh Wong - Dade County Environmental Resources Management-Air
Jim Williams - DER's South Florida Subdistrict

Public Notice

The Department intends to issue a permit to Cleveland Pneumatic Product Service Division for the construction of a solvent cleaning, sandblasting, spray painting, and metal plating operation at the Miami International Airport, Miami, Florida. The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code (F.A.C.).

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

Mr. C. H. Fancy
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:

Ms. Martha Hall
Office of General Counsel
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

	INITIAL	DATE
1. TO: (NAME, OFFICE, LOCATION) Bill Thomas		
2.		
3.		
4.		

REMARKS:

1st Final on

Cleveland Pneumatic

P/N 11/6

INFORMATION
- REVIEW & RETURN
- REVIEW & FILE
- INITIAL & FORWARD

DISPOSITION
- REVIEW & RESPOND
- PREPARE RESPONSE
- FOR MY SIGNATURE
- FOR YOUR SIGNATURE
- LET'S DISCUSS
- SET UP MEETING
- INVESTIGATE & REPT
- INITIAL & FORWARD
- DISTRIBUTE
- CONCURRENCE
- FOR PROCESSING
- INITIAL & RETURN

FROM: Bruce

DATE 11/4/81

PHONE

Technical Evaluation

and

Preliminary Determination

Cleveland Pneumatic Product Service Division

Miami, Florida

Application Number:

AC 13-41491

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

I. Project Description

A. Applicant

Cleveland Pneumatic Product Service Division
P. O. Box 52 0320, Bldg. 2121
Miami International Airport
Miami, Florida 33152

B. Project and Location

The applicant plans to modify an existing hangar building to house a vapor degreaser, a sandblasting process, a shot peen process, metal platers and associated ovens, a paint spray booth, and necessary control equipment to disassemble, rebuild, and reassemble landing gear parts. The vapor degreaser will use 3,600 gallons (22.00 tons per year (TPY)) of trichloroethylene annually. The facility annual uncontrolled emissions of volatile organic compounds (VOC) will be 22.00 TPY of trichloroethylene and 0.76 TPY of paint thinner and primer combined. The facility will operate 2080 hrs. per year.

The facility will be located at the Miami International Airport in Miami, Florida. The UTM coordinates are 570.000 km east and 2853.000 km north.

C. Process and Controls

The operation consists of disassembling the landing gear into components, cleaning the components in an open top vapor degreaser, removing paints by sandblasting, removing various coatings by a shot peen process, repainting or replating, rebuilding or replacing defective parts, and finally reassembling the unit.

The sandblasting process and shot peen process will each have a fabric filter control system to collect the particulate matter emissions. The sandblasting process is fully self-contained with no discharge. The shot peen process dust collector has a projected efficiency of 99.5%.

All of the painting will take place inside of a paint arrestor type spray booth. The control section of the booth will contain 48 paint filters and an exhaust stack. The manufacturer projects greater than 90% collection efficiency of the paint particulate matter. No control will be applied to VOC emissions from the paint. Filter inspection will be foremost in a pollution abatement program unless a draft guage is installed to indicate when the exhaust filters need replacement.

The new plant will contain several plating lines including chromium, nickel, and cadmium plating processes. In order to remove toxic fumes from the plating tanks, two (2) fume scrubber systems with associated duct work, fans, and sprayers will be installed. One (1) fume scrubber will serve three (3) chromium plating tanks and two (2) strip tanks with a minimum removal efficiency of 97%. The other fume scrubber will serve a sulfuric acid and three (3) nickel sulfamate tanks with a minimum removal efficiency of 99%. Furthermore, the heat treating ovens that will follow the metal plating operations are electrically powered with no emissions and exhaust; consequently, no air pollution control equipment will be required.

The open top vapor degreaser will have an opening greater than 10.8 square feet; therefore, the cover will be motorized. There will be a minimum freeboard ratio of 0.75. The cover will be open a maximum of three (3) minutes during the degreasing operation. The following safety switches will be required:

(1) a condenser flow switch and thermostat which shut off the heat if the condenser coolant is either not circulating or too warm,

(2) a spray safety switch which shuts off the spray pump if the vapor level drops more than four (4) inches (10 centimeters) below the bottom condenser coil, and

(3) a vapor level control thermostat which shuts off the heat when the vapor level rises too high.

Other control practices required in 17-2.16(6)(ℓ)3, F.A.C., will become part of the "Specific Conditions." Only good operational practices will be used to keep the VOC emissions to a minimum, and those emissions that do escape will be released into the ambient air untreated.

Estimates of VOC emissions will be accomplished through accurate record-keeping of paint/solvent purchasing and usage. Submittal of these records to the Department, DER's West Palm Beach Office, and Dade County's Pollution Control Office for evaluation will assure limitation of VOC emissions to acceptable levels.

II. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapter 17-2, Florida Administrative Code (F.A.C.).

The proposed project is located in the Dade County ozone nonattainment area. Since potential emissions of VOC's are greater than fifteen (15) tons per year (TPY) and allowable emissions are less than 100 lbs./hr. and fifty (50) TPY, this is a "Tier I" source and is subject to the Limited New Source Review (NSR) exemption according to 17-2.17(3)(a)1.a.(ii) requiring permitting in accordance with 17-2.17(4). Furthermore, only those VOC's not exempted in 17-2.17(3)(a)2.a. and 17-2.16 (4) will be considered.

Under 17-2.17(4), review should be conducted in accordance with Federal New Source Performance Standards (NSPS) or Hazardous Air Pollutant Standards, or any applicable emission limiting standard in Chapter 17-2.05 or 17-2.16, F.A.C., with precedence going to the more restrictive limit. Since there are currently no NSPS regulations on VOC's for open top solvent degreasers and there was no BACT (Best Available Control Technology) determination, this source will be regulated under the VOC RACT (Reasonable Available Control Technology) Rule, 17-2.16 (Nonattainment Areas and Emission Limits for Ozone), F.A.C., 17-2.17 (New Source Review for Nonattainment Areas), F.A.C., and 17-2.05(5) (VOC emissions or organic solvent emissions), F.A.C., which gives the Department authority to require vapor emission control devices or systems as deemed necessary.

The paint spray booth operation will have VOC emissions. However, the VOC emissions will be less than fifteen (15) pounds (6.8 kilograms) in any one (1) day and not more than three (3) pounds (1.4 kilograms) in any one (1) hour. Therefore, this source is an exception and exempt under 17-2.16(3)(a), F.A.C.

Regarding particulate matter from the shot peen process, the process weight rate is less than thirty (30) tons per hour (TPH) and would require the use of the equation, $E = 3.59\ P^{0.62}$, according to 17-2.05(2), F.A.C., to calculate the emission limit. The emissions limit for this pollutant calculates to be 0.56 pounds per hour and 0.87 TPY. Since actual emissions are less than fifteen (15) TPY (de minimus level), the emissions are considered insignificant and exempted from PSD (Prevention of Significant Deterioration) Review according to 17-2.04, F.A.C. To assure this, compliance with particulate emissions should require no visible emissions from the exhaust flue gas.

Potential particulate emissions from the solids portion of the paints are 0.9 TPY. By the expected reduction of 90% (manufacturer's proposed efficiency) through the use of exhaust filters, the actual emissions will be equal to or less than 0.09 TPY. Since actual emissions are less than fifteen (15) TPY (de minimus level), the emissions are considered insignificant and exempted from PSD Review according to 17-2.04, F.A.C. To assure this, compliance with particulate emissions shall require no visible emissions from the exhaust flue gas.

The fugitive particulate control provisions of 17-2.05(3), F.A.C., must be satisifed.

Objectionable odor control must be satisfied according to 17-2.05(4), F.A.C.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The proposed VOC emission rates are based upon information in the application and its amendments. Individual solvent potential emissions are given in the following table. The emission rates are based on 2,080 hours of operation:

	Potential Emissions	
Solvent	lbs./hr.	TPY
Trichloroethylene [1]	21.15	22.00
1.1.1. Trichloroethane	14.00	22.4*
Paint [2]	0.73	0.76
Total		22.76

*1,1,1 Trichloroethane is nonreactive and exempted according to 17-2.17(3)(a)2.a. and 17-2.16(4), F.A.C.

The potential emissions do not exceed 50 TPY; therefore, it is assumed that the allowable emissions will not exceed 50 TPY, the cutoff required for the Limited New Source Review Exemption (LNSRE). Process and equipment design will further reduce the VOC emissions such that a 50% reduction is expected (AP-42, Table 4.6-2, Projected Emission Reduction Factors for Solvent Degreasing). This reduction should maintain emissions to under 100 lbs./hr., a second criteria for the LNSRE. In conclusion, this facility will be limited to maximum VOC emissions as given in the following table, based on the Potential

[1]See Attachment 5: Memo dated October 21 and November 2, 1981.

[2]See Attachment 2: Table 2, Emission Inventory, Addendum dated July 20, 1981.

Emissions and 50% minimum expected efficiency[1] :

Solvent	Allowable Emissions lbs./hr	TPY
Trichloroethylene	10.58	11.0
Paint	0.73	0.76

Given the impracticality of a VOC emissions test in this case, compliance shall be proven through materials balance reports submitted to the Department and local authority on an annual basis.

Particulate emissions from the shot peen process are based on process weight rates and the calculated maximum allowable emissions are:

Particulate 0.56 lbs./hr., not to exceed 0.87 TPY

Since the emissions will be under 15 TPY (de minimus level), the emissions are considered insignificant. To assure this, compliance of particulate emissions shall require no visible emissions from the exhaust flue gas.

Visible Emissions 0% Opacity

Potential particulate emissions from the solids portion of the paints are calculated to be 0.9 TPY. Proper use and maintenance of the proposed exhaust filters will reduce particulate emissions to 0.09 TPY. Therefore, emissions are considered insignificant and shall require no visible emissions from the exhaust flue gas.

Particulate 0.087 lbs./hr., not to exceed 0.09 TPY
Visible Emissions 0% Opacity

Fugitive emissions from the modified hangar should not be a problem at this facility. However, if a Department or local program representative should determine that fugitive emissions are excessive during a compliance inspection, greater than 20% opacity, the applicant shall be required to correct the problem.

If the plant is a source of objectionable odors, the applicant shall be required to correct the problem by whatever means necessary.

B. Air Quality Analysis

No modeling for VOC's is required.

[1]See Attachment 2: Addendum dated July 20, 1981.

IV. CONCLUSIONS

The proposed VOC emission rates were based upon information in the application, the application amendments, and the vendor's information/specifications. It has been determined that more stringent emission limiting requirements and controls, than that required by Chapters 17-2.16, 17-2.05, and 17-2.17, F.A.C., would not be economically justifiable.

Maximum VOC emissions shall be limited as follows:

Solvent	Allowable Emissions lbs./hr.	TPY
Trichloroethylene	10.58	11.0
Paint	0.73	0.76

Given the impracticality of VOC emission tests in this case, compliance shall be proven through materials balance reports submitted to the Department and local authority on an annual basis.

The particulate emission limits for the shot peen process, based on a process weight rate calculation, is 0.56 lbs./hr. and 0.87 TPY with 0% opacity. Particulate emission limits from the paint spray booth, with an expected 90% plus reduction by paint exhaust filters, shall be equal to or less than 0.09 TPY with 0% opacity. Since actual emissions will be less than 15 TPY, the emissions from both sources are considered insignificant and exempted from PSD Review. However, compliance with particulate emissions shall require no visible emissions from the exhaust flue gas. Furthermore, the plant will not be allowed to operate unless the paint exhaust fan filters are in place and are functioning properly.

There shall be no emissions from the sandblasting operation. Fugitive emissions, if found to be in excess of 20% opacity, shall require attention by the applicant with an abatement program instituted. The same shall be required of the applicant if an objectionable odor exists.

The permitted emissions from this facility, with its annual maximum utilization rate of 3,600 gallons of trichloroethylene (VOC), will not cause or contribute to any violation of ambient air quality standards.

The General and Specific Conditions listed in the proposed permits (attached) will assure compliance with all applicable requirements of Chapter 17-2, F.A.C..

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR
Victoria J. Tschinkel
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT:

Cleveland Pneumatic Products Service
Division, Inc.
P.O. Box 52 0320, Bldg. 2121
Miami International Airport
Miami, Florida 33152

PERMIT/CERTIFICATION NO. AC 13-41491

COUNTY: Dade

PROJECT: Landing - Gear Rebuilding/Refurbishing Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the modification of an existing hangar at the Miami International Airport, Miami, Florida, to disassemble landing-gears, rebuild or replace parts, repaint or replate parts, and reassemble the parts. The UTM coordinates are 570.000 km. East and 2853.000 km. North.

Construction shall be in accordance with the permit application and its amendments, plans, documents, and drawings except as otherwise noted on pages 3, 4, and 5 of "Specific Conditions".

Attachments are as follows:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16),and accompanying letter from Dade County's Environmental Resources Management-Pollution Control Division.

2. Cleveland Pneumatic Company's letter of July 20, 1981 (Response to Technical discrepancies).

3. Cleveland Pneumatic Company's letter of October 8 , 1981 (Response to Technical discrepancies).

4. Comments on Wastewater Discharge.

5. Trichloroethylene usage by the month for 1981 as received by phone from Mr. William D. Propes, Cleveland Pneumatic, Miami, Florida, (10/21/81 and 11/2/81).

PERMIT NO.: AC 13-41491
APPLICANT: Cleveland Pneumatic Products Service Division, Inc.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions:, and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. In 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 source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department 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 department rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalities therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

[ ] Determination of Best Available Control Technology (BACT)
[ ] Determination of Prevention of Significant Deterioration (PSD)
[ ] Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 13-41491
APPLICANT: Cleveland Pneumatic Products Service Division, Inc.

SPECIFIC CONDITIONS:

1. Maximum allowable emissions from the open top vapor degreaser and paint spray booth shall be 10.58 lbs/hr.(11.0TPY) and 0.73 lbs/hr.(0.76 TPY) respectively.
2. VOC emissions shall be accounted for and controlled through accurate record-keeping of all paints and solvents used in operation of the open top vapor degreaser and paint spray booth. The applicant shall submit annual reports to the DER South Florida Subdistrict Office and Dade County's Environmental Resources Management - Pollution Control Division as proof of compliance with permit VOC limits commencing one (1) year after the operating permit is issued and annually thereafter.

3. The paint spray booth shall not be operated unless the exhaust fan and filters are functioning properly.

4. Equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone.

5. Provide the following safety switches:

   a. A condenser flow switch and thermostat which shut off the heat if the condenser coolant is either not circulating or too warm; and,

   b. A spray safety switch which shuts off the spray pump if the vapor level drops more than 4 inches (10 centimeters) below the bottom condenser coil; and,

   c. A vapor level control thermostat which shuts off the heat when the vapor level rises too high.

6. Install a freeboard ratio greater than or equal to 0.75 and a powered or mechanically assisted cover because the degreaser opening is greater than 10.8 square feet (1.0 square meter).

7. Keep the cover closed at all times except when processing work loads through the degreaser.

8. Minimize solvent carryout by:

   a. Racking parts to allow complete drainage; and,

   b. Moving parts in and out of the degreaser at less than 11 feet per minute (3.3 meters per minute); and,

   c. Holding the parts in the vapor zone at least 30 seconds or until condensation ceases; and

   d. Decanting any pools of solvent on the cleaned parts before removal from the vapor zone; and,

e. Allowing parts to dry within the degreaser for at least 15 seconds or until visually dry.

9. Not degrease porous or absorbent materials, such as cloth, leather, wood, or rope.

10. Not occupy more than half of the degreaser's open-top area with a workload.

11. Not load the degreaser to the point where the vapor level would drop more than 4 inches (10 centimeters) below the bottom condenser coil when the workload is removed from the vapor zone.

12. Always spray below the vapor level.

13. Repair solvent leaks immediately, or shut down the degreaser.

14. Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.

15. Not operate the cleaner so as to allow water to be visually detectable in solvent exiting the water separator.

16. Not use ventilation fans near the degreaser opening, nor provide exhaust ventilation exceeding 66 cubic feet per minute per square foot (20 cubic meters per minute per square meter) of degreaser open area, unless necessary to meet OSHA requirements.

17. Provide a permanent, conspicuous label, summarizing the operating procedures 7 through 15.

18. Provide a continuous maintenance program to the baghouses servicing the shot peen and sandblasting processes.

19. No visible emissions, 0% Opacity, allowed from the baghouses.

20. No emissions allowed from the sandblasting process or its associated baghouse.

21. Maximum particulate emissions from the shot peen process is 0.56 lbs/hr and 0.87 TPY.

22. Maximum particulate emissions from the paint spray booth is 0.09 TPY (0.087 lbs/hr.).

23. The applicant shall notify the Department 30 days prior to compliance testing.

24. Compliance with the conditions of the permit shall be determined through visual inspection by a Department representative during normal operating conditions and submittal of paint/solvent records as stated in Condition No. 2. If at that time, fugitive particulate emissions are determined to be greater

than 20% opacity, provisions must be taken by the applicant to correct the problem before an operating permit is issued.

25. Following approval of test results and prior to 90 days before the expiration of this permit, a complete application for an Operating Permit shall be submitted to the DER South Florida Subdistrict Office and Dade County's Environmental Resources Management - Pollution Control Division. Full operation of the source may then be conducted in compliance with the terms of this permit until the expiration or receipt of an Operating Permit.

Expiration Date: April 30, 1982

Issued this _____ day of _____, 19____.

5 of 5 Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

_____
Signature

PUBLIC NOTICE

The Florida Department of Environmental Regulation (DER) has received an application from and intends to issue a Construction Permit to Cleveland Pneumatic Product Service Division for the construction of a metal plating facility to be located at Miami International Airport, in Dade County, Florida. A determination of Best Available Control Technology was not required. Copies of the application, Technical Evaluation, and Departmental Intent are available for inspection at the following offices:

FDER, South Florida Subdistrict
Dept. of Environmental Regulation
2745 S. E. Morningside Blvd.
Port St. Lucie, Florida
33452

Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Dade County Department of Environmental Resources Management
515 West 6th Street
Jacksonville, Florida 32206

Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee Office, within 30 days of this notice.

To Appear In: Miami Herald

On: 11/2/81

To Purchasing 10/21/81

Public Notice 11/2/81

~~10/21/81~~

PUBLIC NOTICE

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Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee Office, within 30 days of this notice.

To Appear In: Miami Herald

On: 11/2/81

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

MIAMI HERALD
1 HERALD PLAZA
MIAMI, FL 33101

10-21-81

Dear Sir:

We are forwarding to you a legal/~~classified~~ advertisement to be published:

NOV 2, 1981 - MONDAY

Subject: CONSTRUCTION PERMIT

To ensure prompt payment, please send an invoice and proof of publication for legal ads to the address below:

Department of Environmental Regulation
PURCHASING OFFICE
2600 Blair Stone Road
Tallahassee, FL 32301

If you have any questions, please contact us at 904/488/0870.

Sincerely,

William H. Wallace
Purchasing Office

Enclosure: (1)

OCT 1981
BUREAU
A Q M

Bill Wallace

PUBLIC NOTICE

The Florida Department of Environmental Regulation (DER) has received an application from and intends to issue a Construction Permit to Cleveland Pneumatic Product Service Division for the construction of a metal plating facility to be located at Miami International Airport, in Dade County, Florida. A determination of Best Available Control Technology was not required. Copies of the application, Technical Evaluation, and ~~Departmental~~ DER Intent are available for inspection at the following offices:

~~F~~DER, South Florida Subdistrict
~~Dept. of Environmental Regulation~~
2745 S. E. Morningside Blvd.
Port St. Lucie ~~, Florida, 33452~~

Bureau of Air Quality ~~Management~~ Mgt.
~~Department of Environmental Regulation~~ DER
2600 Blair Stone Road
Tallahassee, Florida 32301

Dade County Department of Environmental Resources Management
515 West 6th Street
Jacksonville ~~, Florida 32206~~

Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee Office, within 30 days of this notice.

To Appear In: Miami Herald

On: 11/2/81

Please call Sue Powell if any problems 8-B44

DER
OCT 21 1981
PURCHASING

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____ Loctn.: _____		
To: _____ Loctn.: _____		
To: _____ Loctn.: _____		
From: _____ Date: _____		
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Cleveland Pneumatic File

FROM: Bruce Mitchell via phone call with Mr. William D. Propes, Environmental and Quality Lab Supervisor, Cleveland Pneumatic, MIAD, Miami, Florida.

DATE: October 21, 1981
November 2, 1981

SUBJ: Trichloroethylene monthly usage in 1981.

TRICHLOROETHYLENE MONTHLY USAGE - 1981

Month	Gal./Mth.	Potential Emissions Lbs./Mth.	Comments
May	550	6,721*	Transmitted 10/21/81
June	250	3,055	Transmitted 10/21/81
July	300	3,666	Transmitted 10/21/81
August	200	2,444	Transmitted 10/21/81
September	250	3,055	Transmitted 10/21/81
October 31, 1981	250	3,055	Transmitted 11/2/81
Total	1800**	21,996	

*1 gallon trichloroethylene = 12.22 lbs.

** For May thru October, 1981: 1800 gals. used for a 6-month period.

Therefore, an annual estimate:

1800 gal./6 mths. x 12 mths./yr.=3,600 gal. annually
3,600 gal./yr x 12.22 lbs./gal.=43,992 lbs./yr.
43,992 lbs./yr x ton/2000 lbs.=22.00 TPY

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Bill Thomas, BAQM

THROUGH: David W. York

FROM: David H. Scott

DATE: October 5, 1981

SUBJECT: Cl20429010 - Miami-Dade County
Cleveland Products, Inc.
Miami International Airport

Herb Zebuth reported on 10/2/81 that the Miami-Dade sludge already has a fairly high heavy metals content and maybe should consider more stringent heavy metal controls. Other than that, the pretreatment appears to be fairly standard for the materials they are dealing with. Mr. Zebuth notes that Miami-Dade has the most lenient requirement of all listed in the report.

DHS/mj

cc: J. P. Subramani
Herb Zebuth

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee

To: _____ Loctn.: _____
To: _____ Loctn.: _____
To: _____ Loctn.: _____
From: _____ Date: _____

TO: Mr. Bill Thomas, Bureau of Air Quality Management

THROUGH: Dr. David W. York, Administrator, Sewage Technology and Planning Section
Bureau of Wastewater Management and Grants

FROM: David H. Scott, P.E., Sewage Technology and Planning Section
Bureau of Wastewater Management and Grants

SUBJECT: Cl20429010 (Step 1) Miami-Dade

DATE: October 2, 1981

This is in response to your request of September 10, 1981 for our comments about water permitting on the Engineering Report for Wastewater Pretreatment Facilities and Air Pollution Control Facilities/Cleveland Pneumatic Product Service Division Inc., Miami International Airport. We circulated copies of the engineering report excerpt to both Dr. J. P. Subramani and Mr. Herb Zebuth in the sub-district office.

Dr. Subramani reports that there is no problem with the proposed approach, as Cleveland Pneumatic Product Service Division, Inc. is meeting the standards of a local ordinance which is more stringent than the Federal Pretreatment Standards. Dr. Subramani also notes that they do not need a permit if they have a connection permit from the owner/operator of the wastewater collection system which receives the wasteload.

Mr. Zebuth reports that he was on leave and the document apparently was circulated elsewhere within his subdistrict, and if he has any comments other than the above he will forward them at the earliest opportunity. In the meantime, he concurs with Dr. Subramani's recommendations.

DWY/dsm

cc: Dr. J. P. Subramani
Mr. Herb Zebuth

ENGINEERING REPORT

FOR

WASTEWATER PRETREATMENT FACILITIES

AND

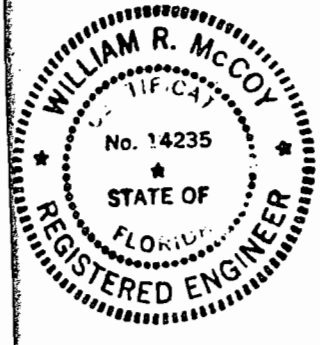
AIR POLLUTION CONTROL FACILITIES

PROJECT: CLEVELAND PNEUMATIC PRODUCT SERVICE DIVISION, INC.
MIAMI INTERNATIONAL AIRPORT
MIAMI, FLORIDA

CLIENT: METALS APPLIED, INC.
DIVISION OF CLEVELAND PNEUMATIC
CLEVELAND, OHIO

REVISED MARCH 1981

FEBRUARY, 1981



ENWRIGHT ASSOCIATES, INC.
ENGINEERS
GREENVILLE, SOUTH CAROLINA

PROJECT NO. 81004-00-2-00

William R. McCoy
William R. McCoy, PE
Vice President

Rick C. Wilkey
Rick C. Wilkey, PE
Project Manager

III. WASTEWATER CHARACTERIZATION

A. Wastewater Flowrates

The majority of wastewater generated at Cleveland Pneumatic will be overflows from the fume scrubbers. Estimated flowrates are:

System I: 6.25 gpm.

System II: 3.75 gpm.

As previously described, wastewater flows from the plating area will be intermitten. The majority of the rinse tanks are "dead" (e.g., non-continuous) rinses. Most excess rinse waters are used as make-up supplies for the plating tanks.

Estimated average process flowrate to the pretreatment facilities is 10.4 gpm or approximately 15,000 gallons per 24 hours. The DMP pretreatment system is capable of handling 20 gpm (28,800 gals/24 hours) on a continuous basis. Sump holding tanks, sump pumps and the pump controls are designed to accommodate either intermitten or continuous wastewater flows.

B. Wastewater Analysis

1. Cadmium/Cyanide (CN) Wastewater

The untreated Cd/CN wastewater will contain varying concentrations of the following compounds/elements:

a) Metallic Cadmium

b) Sodium Cyanide

c) Sodium Carbonate

d) Sodium Hydroxide

2. Chromate Wastewater

a) Sodium Dichromate

b) Sulfuric Acid

3. Chrome Rinse Wastewater

a) Nitric Acid

b) Hydrochloric Acid

c) Sodium Hydroxide

d) Metallic Nickel

e) Boric Acid

f) Wetting Agents/Additives

g) Chromic Acid

4. Chrome Stripping Wastewater

a) Chromium (+3)

b) Sodium Hydrosulfite

c) Sodium Hydroxide

C. Wastewater Treatability

1. Cyanide Treatment

Cyanide wastes will be treated through the use of alkaline chlorination. Cyanide will be converted to sodium cyanate in a one-step process by feeding caustic soda (NaOH) for pH adjustment and sodium hypochlorite for oxidation of the cyanide. The chemical equation for conversion of cyanide to sodium cyanate is:

$$NaCN + NaOCl \rightarrow NaCNO + NaCl$$

The optimum pH for this reaction is in the range 10.0 to 11.0.

2. Chromium Treatment

Chromium wastes will be treated by standard reduction and precipitation. Hexavalent chromium (Cr^{+6}) must be reduced to trivalent chromium (Cr^{+3}) prior to precipitation. Sodium metabisulfite ($Na_2S_2O_5$) or sodium bisulfite can be utilized for chromium reduction. The following equation presents reduction of chromic acid:

$$4CrO_3 + 3Na_2S_2O_5 + 3H_2SO_4 \rightarrow 2Cr_2(SO_4)_3 + 3Na_2SO_4 + 3H_2O$$

This reaction is instantaneous at a pH of 1 and essentially instantaneous at a pH of 2.0 to 2.5.

Alkaline chrome stripping wastewater will be reduced while in the alkaline condition. Sodium hydrosulfite will be utilized as the reducing agent. The chrome will be mixed with other wastewaters for precipitation.

Heavy metals such as chromium can be precipitated as metal hydroxides. Typically, sodium hydroxide is used. The chemical equation for precipitation of chromium is:

$$Cr_2(SO_4)_3 + 6NaOH \rightarrow 2Cr(OH)_3\downarrow + 3Na_2SO_4$$

The solubility of metals is pH dependent. Graphs (from EPA publication) showing the relation between pH and metals solubility are presented in Appendix 1.

IV. WASTEWATER PRETREATMENT SYSTEM

A. Required Effluent Quality

Effluent quality at the new Cleveland Pneumatic plant in Miami, Florida will be governed by regulations of the Metro-Dade County Code [Section 24-11(9)], regulations of the Miami-Dade Water and Sewer Authority and the Environmental Protection Agency (EPA) Pretreatment Standards.

Local Pretreatment guidelines affecting Cleveland Pneumatic are presented in Table 7. Excerpts from these guidelines are included as Appendix 7.

TABLE 7

LOCAL PRETREATMENT GUIDELINES
DADE COUNTY, FLORIDA

Parameter	Section 24-11(9) Metro-Dade County Code	Miami-Dade Water and Sewer Authority
pH (units)	5.5 to 9.5	5.5 to 9.5
CN (mg/l)	0.01	2.0
Cr (mg/l)	0.5	0.5
Cr (T)	1.0	10.0
Cd (mg/l)	0.5	2.0
Ni (mg/l)	None	10.0

The Federal (EPA) pretreatment guidelines for discharge of more than 10,000 gallons per calendar day are given in Table 8. The pretreatment guidelines for less than 10,000 gpd are presented as Table 9.

TABLE 8

FEDERAL PRETREATMENT GUIDELINES
ELECTROPLATING OF COMMON METALS SUBCATEGORY
10,000 GPD OR MORE DISCHARGE
(Effective Regulation Date: March 16, 1981)

Pollutant or pollutant property	Pretreatment standard (mg/1)	
	Maximum for any 1 day	Average of daily values for 4 consecutive monitoring days shall not exceed-
CN,T.....	1.9	1.0
Cu.....	4.5	2.7
Ni.....	4.1	2.6
Cr.....	7.0	4.0
Zn.....	4.2	2.6
Pb.....	0.6	0.4
Cd.....	1.2	0.7
Total metals.....	10.5	6.8

TABLE 9

FEDERAL PRETREATMENT GUIDELINES
ELECTROPLATING OF COMMON METALS SUBCATEGORY
10,000 GPD OR LESS DISCHARGE
(Effective Regulation Date: March 16, 1981)

Pollutant or pollutant property	Pretreatment standard (mg/1)	
	Maximum for any 1 day	Average of daily values for 4 consecutive monitoring days shall not exceed-
CN,A.....	5.0	2.7
Pb.....	0.6	0.4
Cd.....	1.2	0.7

The Metro-Dade County Code, Section 24-11(9), Table 7, presents the most stringent guidelines, with the exception of nickel. Thus, Cleveland Pneumatic's wastewater will be governed by the Dade County Code for all parameters except nickel. Effluent nickel concentrations will be governed by the EPA guidelines presented in Table 8.

Considerable research has been conducted concerning the chemistry and fate of cyanide in wastewaters and the environment. Research shows that cyanide toxicity is associated with molecular hydrogen cyanide (HCN). Consequently, effluent guidelines should be based on free or molecular cyanide, not on total cyanide. This is particularly important to the metal finishing/electroplating industry due to possible presence of cyanide/iron complexes.

Analyses for cyanide at the 0.01 mg/l level is difficult. A number of substances, including sulfides and fatty acids, can interfere with the analyses. Confidence levels at the 0.01 mg/l level are questionable.

Excerpts from an EPA cyanide report and excerpts from an Inter-Industry Cyanide Group Report are presented as Appendix 8. These excerpts present information concerning cyanide toxicity and analyses problems.

The DMP pretreatment system, when properly operated, contains the equipment necessary to pretreat Cleveland Pneumatic's wastewater (as herein described) within compliance of the local pretreatment guidelines.

B. Proposed Pretreatment Facilities

The overall concept for the proposed system for Cleveland Pneumatic wastewater treatment system is presented in the Process and Instrumentation Diagram, drawing number 81004-CE1, page 23. The pretreatment system layout and arrangement is shown on the General Arrangement, drawing number 81004-CE2, page 24.

The proposed pretreatment system will be designed to handle three separate wastestreams as follows:

1. Cyanide

   Rinsewaters from the cadmium plating line will be collected in a sump tank, pumped to a cyanide storage tank and held for metering to the cyanide treatment reactor.

2. Chromium

   Rinsewaters from the chrome and nickel plating lines, the nital etch line, the chromate coating line and overflows from the fume scrubbers will be collected in a sump tank and held for pumping to a chrome treatment reactor.

3. Chromium Strip

   Rinsewaters and dumps from the chrome strip line will be collected in a holding tank, batch treated with sodium hydrosulfite to reduce the Cr^{+6} to Cr^{+3}, then pumped to the DMP treatment system, Tank N-1.

Cleveland Pneumatic

Landing Gear

Product Service Division, Inc.
P.O. Box 520320
Miami, Fla. 33152

October 8, 1981

Mr. Steve Smallwood
Department of Environmental Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Fla. 32301

Subject: Construction Application No. AC13 41491

Dear Mr. Smallwood:

The Department of Environmental Regulations reviewed our application and supplemental material and ruled the information was incomplete. You requested the following information.

1) Give the material balance of the solvents, at 100% pure solvent, to be used annually in the vapor degreaser.

2) Give the hours of operation you desire to be permitted per operation unit.

3) Identify and describe all safety switches (there are some that are mandatory per type of unit used).

The following information is an amendment to the application. If you have any question, please call Dan Propes at 305-871-3428.

Sincerely,

William D. Propes
Environmental & Quality Lab Supervisor

cc: Mr. Ned Angene
Mr. Rick Wilkey

305 | 871-3420 | TLX 80-8114 | TWX 810 848 4153

Cleveland Pneumatic
Landing Gear

Product Service Division, Inc.
P.O. Box 52[illegible]
Miami, Florida [illegible]

Pneumo

AMENDMENT TO:

STATE OF FLORIDA AIR POLLUTION APPLICATION

No. AC 13 41491

FOR

AIR POLLUTION CONTROL FACILITIES

AT

CLEVELAND PNEUMATIC PRODUCT SERVICE DIVISION, INC.

MIAMI INTERNATIONAL AIRPORT

MIAMI, FLORIDA 33152

305 · 871-3420 TLX 80-8114 TWX 810 848 4153

Cleveland Pneumatic

Landing Gear

Product Service Division, Inc.
P.O. Box 520320
Miami, Fla. 33152

Cleveland Pneumatic used approximately ~~3,276~~ 3550 gallons of Trichlorethylene. This is based on last year usage. Cleveland Pneumatic control the degreaser by the following testing:

Requested Density from Don Propes: 10/20/81 Q 1540
10/6/81 12.66 #/gal

1) Acid acceptance test

2) Ph test

3) Percent solids

Cleveland Pneumatic operate the degreaser 2,080 hrs/year.

Safety devices:

1) A water flow switch, which prevents the heater source from bring energized until there is cooling water flowing through the cooling coils.

2) A temperature control is discharge side of the cooling water line which will shut off the heaters if the cooling water overheats and is not able to condense the vapor.

3) The degreaser is designed with 80% freeboard.

4) The degreaser has a motorized cover that is easily open and close without disturbing the vapor zone.

5) A power hoistis used for lowering and raising parts out of the degreaser hoist travels at 9 ft/min.

305 | 871-3420 | TLX 80-8114 | TWX 810 848 4153

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

September 1, 1981

Mr. Ned Angene
Cleveland Pneumatic Product Service
Division
P.O. Box 52 0320
Building 2121, MIAD
Miami International Airport
Miami, Florida 33152

Subject: Construction Application No. AC13 41491

Dear Mr Angene:

The Department has reviewed your application and supplemental material and have ruled the information incomplete. Would you address the following issues and respond as soon as possible:

1) Give the material balance of the solvents, at 100% pure solvent, to be used annually in the vapor degreaser.

2) Give the hours of operation you desire to be permitted per operational unit.

3) Identify and describe all safety switches (there are some that are mandatory per type of unit used).

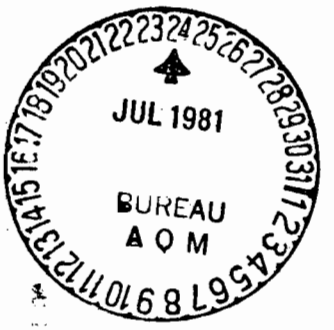
Please send the information as an amendment to the application. If you have any questions, please call Bruce Mitchell at (904) 488-1344.

Sincerely,

for Steve Smallwood, Chief
Bureau of Air Quality Management

cc: Rick Wilkey
Ed Cahill
Jim Williams

ENWRIGHT ASSOCIATES, INC.



July 20, 1981

Mr. Steve Smallwood, Chief
Bureau of Air Quality Management
Department of Environmental Regulation
State of Florida
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Subject: Cleveland Pneumatic Facility
Miami International Airport
Enwright Associates #81004-00-2-00

Dear Mr. Smallwood:

Please find attached detailed emission estimated for the new Cleveland Pneumatic Facility at the Miami International Airport, Miami, Florida, as requested in your letter to Mr. Ned Angene, Cleveland Pneumatic, dated April 29, 1981 (see Appendix I).

As described in the Engineering Report submitted in February, 1981, the Cleveland Pneumatic Facility will rebuild aircraft landing gear parts. Table 1 summarizes the emissions from the degreaser, shot peen operation, plating/stripping operations and the paint booth. Table 2 shows the details of the emission calculations.

The emission factor for the degreaser was obtained from EPA's "Air Pollutant Emission Factors," AP-42 (see Appendix II). The factor 0.15 lb/ft^2-hr was reduced by 50% since the degreaser is equipped with a lid which remains closed except when material is being removed or put into the degreaser. Since the degreaser is not vented through a stack, these emissions will leave the building through other sources.?

The uncontrolled emission factor of 1 grain of PM/SCF for the shot peen operation was obtained from actual emission measurements at a similar facility (see Appendix III). Emissions from the shot peen operation are controlled by a Pangborn baghouse with a collection efficiency of 99.5% (per Mr. James W. Muller, see Appendix IV).

The uncontrolled emission factor for the plating/stripping tanks was obtained from EPA's "Air Pollution Manual," AP-40, page 829. The

measured emission rate of 0.45 lb. of mixture per hour was for a 1300 gallon chrome plating tank operating at 100 amps/ft^2. Mr. Archie McQueen, Source Analysis Branch, EPA/OAQPS, Durham, North Carolina (phone 919/541-5585), suggested that emission rates for tanks of other sizes and operating currents are directly proportional to capacity and propoertional to the square of the current as shown in Table 2. The chrome plating/stripping tanks are controlled by a double packed scrubber, System I, with a removal efficiency of 99% and the nickel plating/stripping tanks are controlled by a single packed scrubber, System II, with a removal efficiency of 97% (see the Scrubber Manufacturer's information in the Engineering Report). Since no current passes through tank #17, the uncontrolled emission factor for this tank was estimated to be less than 25% of a 100 amp/ft^2 tank or 0.25 X (0.45) (gal/1300) lb of mixture/hr.

Emissions from the paint booth are based on Cleveland Pneumatic's estimate of the annual amount of paint used (see Table 3) and the assumption that the total VOC content of the paint evaporates. The paint booth manufacturer estimates that the collection efficiency of the paint filters are greater than 90% (see Engineering Report).

Table 3 contains the details of the tank and paint contents used in the calculations.

I feel that the use of a lid on the degreaser (the major VOC source) and the use of scrubbers on the plating/stripping tanks represents the use of LAER control technology by Cleveland Pneumatic at the facility.

Based on the minimal emissions and the use of LAER control technology, I recommend that a Construction Permit for this facility be approved.

If you have any questions on these calculations, please do not hesitate to call me. I shall look forward to hearing from you in the near future concerning this permit.

Yours very truly,

ENWRIGHT ASSOCIATES, INC.

Rick C. Wilkey, P. E.
Project Manager

RCW/mh
Enclosure: Addendum to
State of Florida Air
Pollution Permit
cc w/enclosure:
Mr. Hugh P. Wong, Dade County
Mr. Ed Cahill, Dade County
Mr. Jim Williams, South Florida District
Mr. Bruce Mitchell, State of Florida
Mr. Ned Angene, Cleveland Pneumatic, Miami
Mr. Dan Propes, Cleveland Pneumatic, Miami
Mr. Tim Aish, Cleveland Pneumatic, Cleveland
File

ADDENDUM TO

STATE OF FLORIDA AIR POLLUTION APPLICATION

ENGINEERING REPORT

FOR

AIR POLLUTION CONTROL FACILITIES

PROJECT: CLEVELAND PNEUMATIC PRODUCT SERVICE DIVISION, INC.

MIAMI INTERNATIONAL AIRPORT

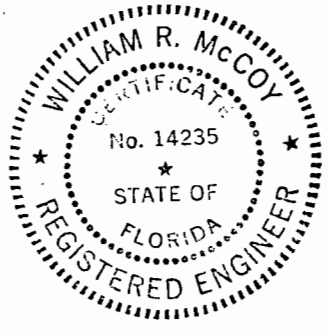
MIAMI, FLORIDA

CLIENT: METALS APPLIED, INC.

DIVISION OF CLEVELAND PNEUMATIC

CLEVELAND OHIO

REVISED JULY 1981



ENWRIGHT ASSOCIATES, INC.
ENGINEERS
GREENVILLE, SOUTH CAROLINA

PROJECT NO. 81004-00-2-00

William R. McCoy, P. E.
Vice President

Rick C. Wilkey, P. E.
Project Manager

TABLE 1

EMISSION SUMMARY

TABLE 1
EMISSION SUMMARY

Emission in Tons/Yr.

Source	PM*	VOC	Chromic Acid CrO_3	H_2SO_4	Boric Acid	NaOH	HFL	Ni
Degreaser		8.2						
Shot Peen	0.8							
System I Scrubber			0.09	0.0009		0.009		
System II Scrubber				0.0006	0.00016		<0.00007	0.0032
Paint Booth	0.1	0.7						
TOTALS	0.9	8.9	0.09	0.0015	0.0002	0.009	<0.00007	0.003

*PM = Particulate Matter

TABLE 2

EMISSION INVENTORY

TABLE 2
EMISSION INVENTORY

ITEM	EMISSION FACTOR CONTROLLED	RATE	OPERATING TIME	UNCONTROLLED EMISSIONS TONS/YR	CONTROL DEVICE (EFFICIENCY)	CONTROLLED EMISSIONS TONS/YR
Degreaser	0.075 $\frac{\text{lb VOC}}{\text{ft.}^2\text{-hr}}$	.53 / 105 ft.^2	3200 / 2080 hr/yr	12.67 / 8.2 VOC	-	8.2 VOC*
Shot Peen	1.0 GrPM/SLF	11,500 cfm	3120 hr/yr	153.8 PM	Baghouse (99.5)	0.8 PM
System I Tanks						
Chrome Tank #1	0.45 $\frac{(\text{amp})^2}{(100)}\frac{(\text{gal})}{(1300)}$ lb/hr	360 amps / (ft^2), 1375 gal	4160 hr/yr	3.2 CrO_3 0.03 H_2SO_4	Scrubber (99%)	0.02 CrO_3 0.0003 H_2SO_4
Chrome Tank #4	"	360 amps / (ft^2), 900 gal	"	2.3 CrO_3 0.02 H_2SO_4	"	0.02 CrO_3 0.0002 H_2SO_4
Chrome Tank #10	"	360 amps / (ft^2), 1732 gal	"	4.0 CrO_3 0.04 H_2SO_4	"	0.04 CrO_3 0.004 H_2SO_4
Chrome Strip #11	"	360 amps / (ft^2), 500 gal	"	0.3 NaOH	"	0.003 NaOH
Chrome Strip #12	"	360 amps / (ft^2), 1000 gal	"	0.6 NaOH	"	0.006 NaOH
System II Tanks						
Nickel Tank #13	0.45 $\frac{(\text{amp})^2}{(100)}\frac{(\text{gal})}{(1300)}$ lb/hr	60 amps / (ft^2), 500 gal	2080 hr/yr	0.005 Ni 0.002 Boric Acid	Scrubber (97%)	0.0001 Ni 0.00006 Boric Acid
Nickel Tank #14	"	"	"	"	"	"
Nickel Tank #15	"	60 amps / (ft^2), 1200 gal	"	0.01 Ni 0.005 Boric Acid	"	0.003 Ni 0.0001 Boric Acid
Nickel Tank #17	$<0.1125\frac{(\text{gal})}{(1300)}\frac{\text{lb}}{\text{hr}}$**	500 gal	"	<0.02 H_2SO_4 <0.02 HFL	"	<0.0006 H_2SO_4 <0.00007 HFL
Paint Booth				0.76		
VOC	3377 lb/yr	45% VOC	-	0.7	-	0.7 VOC
Dry Dust	"	55% Paint & Primer	-	0.9	Paint Filters (90%)	0.1 PM

NOTES:
*Not a Point Source
**Estimated

TABLE 3

TANK & PAINT CONTENTS

TABLE 3
TANK & PAINT CONTENTS

ITEM	CONTENTS	AMPS
System I	% by mass	ft^2
Chrome Tank #1	25% CrO3 & 25% CrO_3	360
Chrome Tank #4	" "	"
Chrome Tank #10	" "	"
Chrome Tank #11	6% NaOH	"
Chrome Tank #12	"	"
System II Ni Tank #13	7% Ni 3% Boric Acid	60
#14	"	"
#15	"	"
#17	42% H_2SO_4	0
	5% HFL	
Paint Booth		
Primer	1680 lb/yr, 45% VOC	
Paint	1697 lb/yr, 46% VOC	

APPENDIX I

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

April 29, 1981

Mr. Ned Angené
Cleveland Pneumatic Product Service Division
P. O. Box 520320
Building 2121, MIAD
Miami International Airport
Miami, Florida 33152

Dear Mr. Angene:

RE: Construction Application for a Plating Operation

The Department has received your application to construct a plating operation with control equipment and have found it to be incomplete. The following items need to be addressed and/or clarified before the application can be processed.

1. In Section III:C, the VOC potential emissions are 16 pounds per hour (#PH) and 26 tons per year (TPY) for the total facility. Show the calculations, referencing the emission factors used, and the amount of emissions to be emitted by each separate point source. Meaning, show the actual emissions from the two (2) fume scrubbers, the baghouse, and the degreaser, separately.

2. In Section III:C, the paint dust potential emissions are 1 #PH and 4 TPY. Show the calculations, referencing the emission factor(s) used.

3. In Section III:C, the actual emissions for VOC's and paint dust are the same as the potential emissions. In Section III:D, the efficiencies indicated are 97 and 99 percent (%) for the fume scrubbers and 99.99% for the dust collector. Therefore, the potential emissions, using the appropriate control efficiencies, will not be the same as the actual emissions. Show how each efficiency was derived, and then recalculate the actual emissions per unit.

Send the requested information as an addendum or revision. If there are any questions, please call Bruce Mitchell at (904) 488-1344.

Sincerely,

Steve Smallwood, Chief
Bureau of Air Quality Management

Bruce Mitchell

SS:dav

cc: Hugh P. Wong
William R. McCoy, P.E.
Ed Cahill, Dade County
Jim Williams, South Florida District

APPENDIX II

SUPPLEMENT NO. 9
FOR
COMPILATION
OF AIR POLLUTANT
EMISSION FACTORS,
THIRD EDITION
(INCLUDING SUPPLEMENTS 1-7)

LIMITED
PREVIEW EDITION

March 1979

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Air and Waste Management
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

Table 4.6-1. SOLVENT LOSS EMISSION FACTORS FOR DEGREASING OPERATIONS.
(EMISSION FACTOR RATING: C)

Type of degreasing	Activity measure	Uncontrolled organic emission factor[a]	
All[b]	Solvent consumed	2,000 lb/ton	1,000 kg/MT
Cold cleaner			
Entire unit[c]	Units in operation	0.33 tons/yr·unit	0.30 MT/yr·unit
Waste solvent loss		0.18 tons/yr·unit	0.165 MT/yr·unit
Solvent carryout		0.08 tons/yr·unit	0.075 MT/yr·unit
Bath and spray evaporation		0.07 tons/yr·unit	0.060 MT/yr·unit
Entire unit	Surface area and duty cycle[d]	0.08 lb/hr. ft^2	0.4 kg/hr. m^2
Open top vapor			
Entire unit	Units in operation	10.5 tons/yr·unit	9.5 MT/yr·unit
Entire unit	Surface area and duty cycle[e]	0.15 lb/hr·ft^2	0.7 kg/hr·m^2
Conveyorized, vapor			
Entire unit	Units in operation	26 tons/yr·unit	24 MT/yr·unit
Conveyorized, nonboiling			
Entire unit	Units in operation	52 tons/yr·unit	47 MT/yr·unit

[a] 100 percent nonmethane hydrocarbons or volatile organic compounds.

[b] Solvent consumption data will provide much more accurate emission estimates than any of the other factors presented.

[c] Emissions would generally be higher for manufacturing units and lower for maintenance units.

[d] For trichloroethane degreaser. From Reference 3, Appendix C-6.

[e] For trichloroethane degreaser. Does not include waste solvent losses.

APPENDIX III

FORM AP 357

ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR POLLUTION CONTROL
PERMIT - PROCESS

APC USE ONLY
Permit
Check No.
Receipt No.
Issued
Expires
Fee
Basis

COMPLETION DATE — DATE INSTALLED
INSTALLATION ☐ — OPERATING ☒

NAME	ADDRESS	BUSINESS
[redacted] Corp.	Oakmont, PA. 15139	MFG
OWNER	**ADDRESS**	**PHONE**
[redacted] Corp.	Oakmont, PA. 15139	412-828-9000
INSTALLER OR CONTRACTOR	**ADDRESS**	**PHONE**
—	—	—
AUTHORIZED REPRESENTATIVE	**TITLE**	**SIGNATURE** / **PHONE**
[redacted]	Dir. Environmental Control	828-4006

PROCESS	YOUR IDENTIFICATION	PRODUCTION RATE ☐ / CHARGING RATE ☒	FEE
Shot Cleaner For Wheel Peening		.133 TONS/HR.	$ 20.00

OPERATING TIME					CONTINUOUS ☒ / BATCH ☐	BATCH TIME
16	HOURS/DAY	5	DAYS/WK.	50	WEEKS/YR.	HR.

RAW MATERIALS: Steel shot sizes - 85% #S550 & 15% fines — TOTAL

MATERIALS PRODUCED: Steel shot sizes - 100% #S550 — TOTAL

FUEL	AMT./HR	BTU	% ASH	% SULFUR	FUEL	AMT./HR.	BTU	% ASH	% SULFUR
—	—	—	—	—	—	—	—	—	—
FUEL	AMT./HR	BTU	% ASH	% SULFUR	FUEL	AMT./HR.	BTU	% ASH	% SULFUR
—	—	—	—	—	—	—	—	—	—

GAS CLEANER	GAS FLOW	INLET TEMP.	DUST LOADING	EFFICIENCY	PRESSURE DROP
FABRIC	~~3300~~ 3300 SCFM	70 °F	0.999 GR./SCF.	99.5 %	3.5/07 "W.
GAS CLEANER	GAS FLOW	INLET TEMP.	DUST LOADING	EFFICIENCY	PRESSURE DROP
—	— SCFM	— °F	— GR./SCF.	— %	— "W.

EMISSION ANALYSIS	PARTICULATE	SO_2	CO	NO_x	HC	OTHER
POTENTIAL	0.999 GR/SCF	NIL	NIL	NIL	NIL	—
FINAL	0.005 GR/SCF	NIL	NIL	NIL	NIL	—

STACK HEIGHT	STACK AREA	EXHAUST FLOW	TEMPERATURE	DUST LOADING
20 FT.	0.92 SQ. FT.	3300 ACFM	70 °F	0.005 GR./SCF

EMISSION BASIS: MFG. DATA ☐ — EMISSION FACTORS ☐ — STACK TEST ☐ — COMPANY ESTIMATE ☒ — SUBMIT SUPPORTING DATA FOR METHOD USED.

NEAREST BUILDING: #116	HEIGHT	DISTANCE	COST OF EQUIPMENT	COST OF GAS CLEANING SYSTEM
	16 FT.	15 FT.	$ —	$ —

DRAWING NO'S. AND TITLES: Location Dwg # 15765 Rev 1

REMARKS

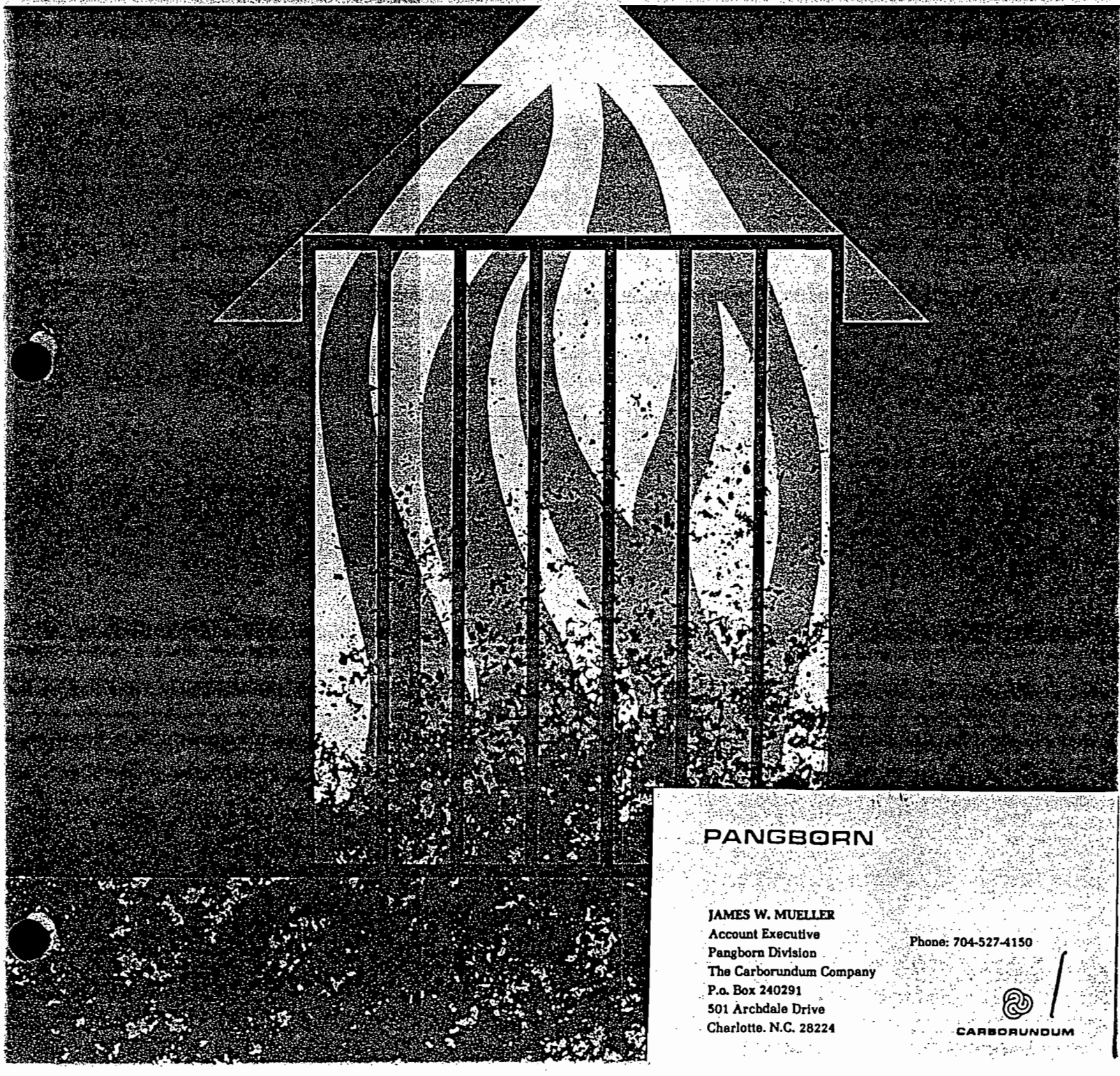
REVIEWED BY	TITLE	DATE	REVIEWED BY	TITLE	DATE
REVIEWED BY	TITLE	DATE	PERMIT APPROVED BY	TITLE	DATE

APC USE ONLY

APPENDIX IV

CN-2 Unit Type Dust Collector

CARBORUNDUM



PANGBORN

JAMES W. MUELLER
Account Executive
Pangborn Division
The Carborundum Company
P.o. Box 240291
501 Archdale Drive
Charlotte. N.C. 28224

Phone: 704-527-4150

CARBORUNDUM

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

KAHEL		FANCY		STARNES	
BLOMMEL		THOMAS		MARY CLARK	
BARKER		GEORGE		HODGES	
J. ROGERS		PALAGYI		MARSHALL MOTT-SMITH	

REMARKS

First we must decide whether permits this Permit App Re: Dade Co Situation call Dade Co's District to let them know. please expedite.

Bruce Mitchell

INFORMATION
- REVIEW & RETURN
- REVIEW & FILE
- INITIAL & FORWARD

DISPOSITION
- REVIEW & RESPOND
- PREPARE RESPONSE
- FOR MY SIGNATURE
- FOR YOUR SIGNATURE
- LET'S DISCUSS
- SET UP MEETING
- INVESTIGATE & REPT
- INITIAL & FORWARD
- DISTRIBUTE
- CONCURRENCE
- FOR PROCESSING
- INITIAL & RETURN

FROM: STEVE SMALLWOOD SS

DATE 7-29

PHONE

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____ Loctn.: _____		
To: _____ Loctn.: _____		
To: _____ Loctn.: _____		
From: _____ Date: _____		
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: File

FROM: Bruce Mitchell

DATE: July 9, 1981

SUBJ: Cleveland Pneumatic (CP) Construction Application and Permit

I was assigned the slot of review engineer on April 7, 1981, of this source. The package was sent to the Department by Hugh Wong, review air engineer for Dade County Environmental Resources (DCER) Pollution Control Division, with an accompanying letter dated March 23, 1981. West Palm Beach (WPB) logged receipt of the package on March 27, 1981. CAPS received the referral from WPB on March 30, 1981.

After speaking with H. Wong on certain application issues, a letter of incompleteness was issued on April 29, 1981. The WPB and DCER offices were copied.

Since I had not been contacted by the company since sending the incompleteness letter, a phone call was made on July 7, 1981, and then several more through the next day. The reason was because it was found that the company had already built the facility under a Dade County Construction Permit without obtaining a State Construction Permit. The events by day are:

A. 7/7/81

1. at 1520: spoke with Steve Barge, WPB, and I. Goldman through Steve Barge - they were unsure about the status, so I requested a site inspection.

2. at 1540: spoke with Ned Angene, V.P. with C.P., and he said that the requested data would be sent.

3. at 1550: spoke with Mr. Childers, DCER, and he said that the facility had already been built.

4. at 1555: spoke with Bill Thomas, BAQM, about the situation.

5. at 1625: spoke with Ned Angene and advised him to await a phone call from BAQM on 7/8/81.

6. at 1650: spoke with Rick Wilkes,consulting engineer for C.P., and requested that he send the requested information.

B. 7/8/81.

1. A.M.: Bill Thomas spoke with Steve Smallwood and Clair Fancy, BAQM
Marshall Mott-Smith, BAQM
Ned Angene

2. at 11:50: Mr. Anderson, DCER supervisor/chief-engineering division, called me. I got Bill Thomas on the phone and we discussed the situation. Mr. Anderson requested referenced material by Bill Thomas of the Jake Varn's memo of a couple of years ago on permitting authority, Chp. 17-2 (current), and a synopsis of the Annual Engineer's Meeting held here in Tallahassee in June, 1981.

   Mr. Anderson said that he had given the release on the facility while H. Wong was out of the office and unavailable for comment.

Note: During the conversation with Mr. Childers,DCER, on July 7, 1981, he said that releasing the county construction permit before final review has been completed is done all the time. Further, he said that this is general practice everywhere. I protested this remark immediately.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

April 29, 1981

Mr. Ned Angene
Cleveland Pneumatic Product Service Division
P. O. Box 520320
Building 2121, MIAD
Miami International Airport
Miami, Florida 33152

Dear Mr. Angene:

RE: Construction Application for a Plating Operation

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2. In Section III:C, the paint dust potential emissions are 1 #PH and 4 TPY. Show the calculations, referencing the emission factor(s) used.

3. In Section III:C, the actual emissions for VOC's and paint dust are the same as the potential emissions. In Section III:D, the efficiencies indicated are 97 and 99 percent (%) for the fume scrubbers and 99.99% for the dust collector. Therefore, the potential emissions, using the appropriate control efficiencies, will not be the same as the actual emissions. Show how each efficiency was derived, and then e lculate the actual emissions per unit.

Send the requested information as an addendum or revision. If there are any questions, please call Bruce Mitchell at (904) 488-1344.

Sincerely,

Steve Smallwood, Chief
Bureau of Air Quality Management

SS:dav

cc: Hugh P. Wong
William R. McCoy, P.E.
Ed Cahill, Dade County
Jim Williams, South Florida Subdistrict

7/7/81 @ 1520
Spoke with Steve Barge and requested a site inspection.

@ 1540
Spoke to Mr. Ned Angene and he said that the data would be on the way.

@ 1550
Spoke with Mr. Childers of DES and he said that the facility had already been built.

@ 1625
Spoke with Mr. Angene and advised him to await a call from me concerning the project.

7/8/81 – AM – BT
(a) Marshall will track them by phone & get back today
(b) Briefed Steve & Clair on problem
(c) Spoke to Mr Angene – apologized for confusion – We will solve problem – Will continue processing SC ASAP w/comp. info. – No operation until permit issued – Will keep informed.

7/8/81 @ 1150
Spoke with Mr. Anderson, DES; Bill Thomas via telephone about correcting communications and permitting authority. Send Pinellas memo (Hayes?) 17-2, synopsis of Annual Eng. meeting, Tally (June, 81).

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#0000000041491 COE# DER PROCESSOR:MITCHELL DER OFFICE:TLH
FILE NAME:ANGENE, NED DATE FIRST REC: 03/30/81 APPLICATION TYPE:AC
APPL NAME:CLEVELAND PNEUMATIC PROD APPL PHONE:(305)871-3420 PROJECT COUNTY:13
ADDR:P.O. BOX 52 0320 CITY:MIAMI ST:FLZIP:33152
AGNT NAME:WILLIAM R. MC COY AGNT PHONE:(803)288-5190
ADDR:P.O. BOX 5287, STATION B CITY:GREENVILLE ST:SCZIP:29606

ADDITIONAL INFO REQ: / / / / / / REC: / / / / / /
APPL COMPLETE DATE: 03/30/81 COMMENTS NEC:Y DATE REQ: / / DATE REC: / /
LETTER OF INTENT NEC:Y DATE WHEN INTENT ISSUED: / / WAIVER DATE: / /

HEARING REQUEST DATES: / / / / / /
HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / / /
HEARING ORDER OR FINAL ACTION DUE DATE: / / MANUAL TRACKING DESIRED:N
*** RECORD HAS BEEN SUCCESSFULLY UPDATED *** 04/07/81 11:11:15
FEE PD DATE#1:03/30/81 $0020 RECEIPT#00050301 REFUND DATE: / / REFUND $
FEE PD DATE#2: / / $ RECEIPT# REFUND DATE: / / REFUND $
APPL:ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED:AC DATE:03/30/81
REMARKS: VAPOR DEGREASER AND SPRAYBOOTH. ALSO METAL PLATING AND STRIPPING WITH SANDBLASTING/ SHOT-PEEN OPERATIONS. THIS FACILITY REBUILDS AIRPLANE LANDING GEAR. UTM: 570.000 E/2853000 N

Transferred from WPB 4/7/81 - Fee entered at WPB office

Start File for:

Cleveland Pneumatic Product
Service Division

Miami

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

	INITIAL	DATE
1. TO: (NAME, OFFICE, LOCATION) Tim Powell		
2. BAQM		
3. Tallahassee		
4.		

REMARKS:

Per telcon with Larry George on 4/1/81, for processing.
Cleveland Pneumatic Products application (construction)

INFORMATION
- REVIEW & RETURN
- REVIEW & FILE
- INITIAL & FORWARD

DISPOSITION
- REVIEW & RESPOND
- PREPARE RESPONSE
- FOR MY SIGNATURE
- FOR YOUR SIGNATURE
- LET'S DISCUSS
- SET UP MEETING
- INVESTIGATE & REPT
- INITIAL & FORWARD
- DISTRIBUTE
- CONCURRENCE
- FOR PROCESSING
- INITIAL & RETURN

FROM: D. Goldman

DATE 4/1/81

PHONE

NOTE: FOR ADDITIONAL INFORMATION SEE ENGINEERING REPORT BY ENWRIGHT ASSOCIATES, INC. DATED MARCH 1981.

file copy

PAID

MAR 30 1981

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Dept. of Environmental Reg.
West Palm Beach

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Plating Operations [X] New[1] [ ] Existing[1]

APPLICATION TYPE: [X] Construction [X] Operation [ ] Modification

COMPANY NAME: Cleveland Pneumatic Product Service Division COUNTY: Dade

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) fume scrubbers (2), dust collectors (2), vapor degreaser (1), arrestor type spray booth (1).

SOURCE LOCATION: Street Bldg. #2121 Miami International Airport City Miami

UTM: East $5_{70}000$m. North $28_{53}000$m.

Latitude 25 ° 47 ' 45 "N Longitude 80 ° 18' 05 "W

APPLICANT NAME AND TITLE: Ned Angene, Vice President of Operations

APPLICANT ADDRESS: P.O. Box 52 0320, Bldg. 2121, MIAD, Miami Intl. Airport, Miami, Fla.,33152

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Cleveland Pneumatic Product Service Division (see list above)

I certify that the statements made in this application for a permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Ned Angene

Ned Angene, Vice President of Operations
Name and Title (Please Type)

Date: 3-12-81 Telephone No. 871-3420

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

WILLIAM R. McCOY
No. 14235
STATE OF FLORIDA
REGISTERED ENGINEER

(Affix Seal)

Signed: William R. McCoy

William R. McCoy
Name (Please Type)

Enwright Associates, Inc.
Company Name (Please Type)

Post Office Box 5287, Sta. B.,Greenville, S.C. 29606
Mailing Address (Please Type)

Florida Registration No. 14235 Date: 3-5-81 Telephone No. 803/288-5490

WILLIAM R. McCOY CERTIFICATE NO. 14235 STATE OF FLORIDA REGISTERED ENGINEER

RECEIVED
MAR 30 1981
Dept. of Environmental Reg.
West Palm Beach

[1]See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Two (2) water spray fume scrubbers for metal plating bath fumes; Two (2) dust collectors - one (1) fully self-contained (no discharge) for sand blasting operations - one (1) cloth tube bag collector for shot peen operations, one (1) vapor degreaser unit, and one (1) paint arrestor type spray booth - (see attached report).

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction March 1981 Completion of Construction April 1981

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Fume Scrubbers:	$60,000
Dust Collector:	$ 8,000
Vapor Degreaser:	$ 1,000
Spray Booth:	$12,000

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

None

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? ____ Yes X No

F. Normal equipment operating time: hrs/day 16 ; days/wk 5 ; wks/yr 40 ; if power plant, hrs/yr N/A ; if seasonal, describe: all air pollution equipment will operate when required. Due to job nature of operations, equipment will not operate continuously.

G. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? yes
   a. If yes, has "offset" been applied? N/A
   b. If yes, has "Lowest Achievable Emission Rate" been applied? N/A
   c. If yes, list non-attainment pollutants.
      Ozone
2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. No
3. Does the State "Prevention of Significant Deterioriation" (PSD) requirements apply to this source? If yes, see Sections VI and VII. No
4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? No
5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? No

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Trichloroethylene	VOC	100	15.25	N/A
(or) 1.1.1.Trichloroethane	VOC	100	14.00	N/A
Paint	VOC	30	1	N/A

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): N/A

2. Product Weight (lbs/hr): N/A

C. Airborne Contaminants Emitted:

Name of Contaminant	Emission[1]		Allowed Emission[2] Rate per Ch. 17-2, F.A.C.	Allowable[3] Emission lbs/hr	Potential Emission[4]		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
VOC's	16.	26			16.	26.	
Paint	1	4			1	4	
Dust							

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles[5] Size Collected (in microns)	Basis for Efficiency (Sec. V, It[5]
Mapco Model #MW-100 Fume Scrubber	Metal Plating Bath Fumes	97%	N/A	Vendor
Mapco Model #MW-100D Fume Scrubber	Metal Plating Bath Fumes	99%	N/A	Vendor
Vacu-Blast Dust Collector	Sandblasting Dust	No Discharge	N/A	N/A
Pangborn Model #168-CT-614 Dust Collector	Shot Peen Dust	99.99%	To 0.5 Micron	Vendor
Vapor Degreaser Tank	Solvent Cleaning Solution	N/A	N/A	N/A
DeVilbiss Model #XDF-6215 Paint Arrestor	Spray Paint Particles			

[1] See Section V, Item 2.

[2] Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E. (1), F.A.C. – 0.1 pounds per million BTU heat input)

[3] Calculated from operating rate and applicable standard

[4] Emission, if source operated without control (See Section V, Item 3)

[5] If Applicable

E. Fuels

N/A

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units Natural Gas, MMCF/hr; Fuel Oils, barrels/hr; Coal, lbs/hr

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. Annual Average N/A Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Liquid waste from fume scrubbers overflow will be treated in wastewater pretreatment plant. Paint filters and dust will be disposed of in accordance with appropriate regulations.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack): Paint Arrestor Spray Booth

Stack Height: To 3 feet above roof line ~~ft.~~ Stack Diameter: 34 inches ~~ft.~~

Gas Flow Rate: 12,500 ACFM Gas Exit Temperature: N/A °F.

Water Vapor Content: N/A % Velocity: 100 FPM ~~FPS~~

SECTION IV: INCINERATOR INFORMATION

NOT APPLICABLE

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By-prod.)
Lbs/hr Incinerated							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ days/week _____

Manufacturer _____

Date Constructed _____ Model No. _____

NOT APPLICABLE

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (^oF)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner [ ] Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

SECTION V: SUPPLEMENTAL REQUIREMENTS

SEE ATTACHED REPORT

Please provide the following supplements where required for this application.

1. Total process input rate and product weight – show derivation.
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.,) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, etc.).
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3, and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8½" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8½" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. An application fee of $20, unless exempted by Section 17-4.05(3), F.A.C. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

NOT APPLICABLE

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?
[ ] Yes [ ] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy) [ ] Yes [ ] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:
2. Operating Principles:
3. Efficiency:*
4. Capital Costs:
5. Useful Life:
6. Operating Costs:
7. Energy:
8. Maintenance Cost:
9. Emissions:

Contaminant	Rate or Concentration

*Explain method of determining D 3 above.

NOT APPLICABLE

10. Stack Parameters

a. Height: ft. b. Diameter: ft.

c. Flow Rate: ACFM d. Temperature: °F

e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency*: d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy*: h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency*: d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy**: h. Maintenance Costs:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

*Explain method of determining efficiency.

**Energy to be reported in units of electrical power – KWH design rate.

3.

a. Control Device:

b. Operating Principles:

c. Efficiency*: d. Capital Cost:

e. Life: f. Operating Cost:

g. Energy: h. Maintenance Cost:

*Explain method of determining efficiency above.

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space and operate within proposed levels:

4.

a. Control Device

b. Operating Principles:

c. Efficiency*:

d. Capital Cost:

e. Life:

f. Operating Cost:

g. Energy:

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency*:

3. Capital Cost:

4. Life:

5. Operating Cost:

6. Energy:

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a.

(1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

*Explain method of determining efficiency above.

(7) Emissions*:

Contaminant	Rate or Concentration

(8) Process Rate*:

b.

(1) Company:

(2) Mailing Address:

(3) City:

(4) State:

*Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions*:

Contaminant	Rate or Concentration

(8) Process Rate*:

10. Reason for selection and description of systems:

*Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII – PREVENTION OF SIGNIFICANT DETERIORATION

NOT APPLICABLE

A. Company Monitored Data

1. _____ no sites _____ TSP _____ ( ) SO^2* _____ Wind spd/dir

Period of monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

2. Instrumentation, Field and Laboratory

a) Was instrumentation EPA referenced or its equivalent? _____ Yes _____ No

b) Was instrumentation calibrated in accordance with Department procedures? _____ Yes _____ No _____ Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____/_____/_____ to _____/_____/_____
month day year month day year

2. Surface data obtained from (location) _____

3. Upper air (mixing height) data obtained from (location) _____

4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO^2	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description on point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

*Specify bubbler (B) or continuous (C).

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

FLORIDA DEPARTMENT OF STATE
George Firestone
Secretary of State

DIVISION OF CORPORATIONS

DER-WPB | Copy ✓ Route # 2 | Action A

CM		PER.	✓	DADE	
SDM		ENF.		BROW.	
PT.P.		T/A		P.SCH.	
AA		BAG		P. BCH.	

REMARKS:

APR 1981
BUREAU
AQM

March, 1981

Metals Applied, Inc.
2800 E. 33rd SSt.
Cleveland, Ohio 44115
Attn: Timothy Aish

SUBJECT: CLEVELAND PNEUMATIC PRODUCT SERVICE DIVISION, INC.

Dear Mr. Aish:

Pursuant to your recent request, we are enclosing a certificate(s) under the Great Seal for above captioned corporation(s).

If we may be of any further assistance, please call (904)488-9520.

Sincerely,

D. W. McKinnon

D. W. McKinnon, Director
Division of Corporations

DWM/ac

Enclosure(s)

RECEIVED
APR 3 1981
Dept. of Environmental Reg.
West Palm Beach

FLORIDA-State of the Arts

The Capitol Tallahassee, Florida 32301

WP-101 (3-80)

State of Florida

Department of State

I certify from the records of this office that CLEVELAND PNEUMATIC PRODUCT SERVICE DIVISION, INC., is a corporation organized under the laws of the State of Florida.

The charter number for this corporation is F05233.

I further certify that said corporation has paid all filing fees due this office through December 31, 1980, and its status is active.

Given under my hand and the Great Seal of the State of Florida, at Tallahassee, the Capital, this the 24th day of March, 1981.

George [illegible]

Secretary of State

CER 101 Rev. 12-80

3301 GUN CLUB ROAD
P.O. BOX 3858
WEST PALM BEACH, FLORIDA 33402

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

WARREN G. STRAHM
SUBDISTRICT MANAGER

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTH FLORIDA SUBDISTRICT

March 19, 1981

Mr. William R. McCoy
Enwright Associates, Inc.
Post Office Box 5287
Station B.
Greenville, SC 29606

Dear Mr. McCoy:

Re: Cleveland Pneumatic Product Service Division (AP)

The above referenced material has been received in this office. It cannot be considered an acceptable application for further Department review because it lacks the following:

[ ] Signature of applicant.

[ ] Letter of authorization (if application is signed by other than applicant).

[ ] Professional Engineer's seal (raised).

[X] Processing fee in the amount of $20.00 (check made payable to the Department of Environmental Regulation).

[ ] Enclosures called out but not included.

[ ] Other:

When the referenced material contains the items checked, the package will be assigned a number and officially entered on Department records. At that time technical review for completeness will begin. The Department is allowed thirty days from date of official receipt for the completeness review of your application. This office has set a target for itself of ten (10) working days.

If you've been unable to provide the item(s) checked to the receptionist at this office by March 29, 1981, the referenced material will be returned to you by mail*.

Sincerely,

Warren G. Strahm
Subdistrict Manager

WGS:fs

cc: Roy Duke
Local Program
PATS Operator
F. Stone

* With the exception of bulky attachments which will be held for 30 days for your pick-up.

ENWRIGHT ASSOCIATES, INC.

March 24, 1981

Department of Environmental Regulation
South Florida Sub-District
Post Office Box 3858
West Palm Beach, Florida 33402

Subject: Cleveland Pneumatic Product Service Division

Gentlemen:

We are enclosing our check in the amount of $20.00 for payment of processing fee for Cleveland Pneumatic Product Service Division.

Yours very truly,

ENWRIGHT ASSOCIATES, INC.

William R. McCoy

William R. McCoy, P. E.

WRM/mh
Enclosure

cc: Mr. Rick Wilkey

METROPOLITAN **DADE** COUNTY, FLORIDA

METRO-DADE

ENVIRONMENTAL RESOURCES MANAGEMENT
909 S.E. FIRST AVENUE
BRICKELL PLAZA BUILDING—RM. 402
MIAMI, FLORIDA 33131
(305) 579-2760

March 23, 1981

AP

DER-WPB	Copy ✓ Action A	Route # 2	
DM		PER. ✓	DADE
SPM		ENF.	SEDM.
FT.P.		T/A	E.ENGR.
AA		BAG	E. SR.

REMARKS:

Warren G. Strahm, P.E.
Subdistrict Manager
Florida Department of Environmental Regulation
P. O. Box 3858
West Palm Beach, Florida 33402

REFERENCE: Application for Permit to Construct an Air Pollution Source

APPLICANT: Cleveland Pneumatic Products Service Div., Inc.

LOCATION: Building 2121, Miami International Airport
POLLUTION SOURCE (1) Vapor Degreaser
POLLUTION CONTROL DEVICE: None

Dear Mr. Strahm:

The referenced application has been reviewed and found to be acceptable within the provisions of Chapters 17-2 and 17-4 of the Rules of the State of Florida Department of Environmental Regulation and Chapter 24, Dade County Pollution Control Ordinance.

The issuance of a permit should be subject to the standard provisos. The APIS number for this source is 404 Point 01.

Very truly yours,

Hugh P. Wong

Hugh P. Wong
Air Engineer
Pollution Control Division

HPW/lja

cc: William R. McCoy
Enwright Associates Inc.
P. O. Box 5287, Sta. B
Greenville, S.C. 29606

RECEIVED
MAR 27 1981
Dept. of Environmental Reg.
West Palm Beach

enwright associates, inc.
ENGINEERS · SURVEYORS · PLANNERS
HAYWOOD ROAD POST OFFICE BOX 5287
GREENVILLE, SOUTH CAROLINA 29606

PHONE 803 – 288-5190

TRANSMITTAL

JOB NAME: Metals Applied, Inc.
Air & Wastewater Facilities for
Cleveland Pneumatic - Miami International Airport

JOB NO. 81004-00-2-00
PAGE NO. 1 OF PAGES 1
DATE March 17, 1981
PURCHASE ORDER NO. OURS ☐ YOURS ☐

THE FOLLOWING INFORMATION AND/OR ATTACHMENTS ARE FOR DISTRIBUTION AS INDICATED BELOW:

COMPANY	TITLE	NO.	REV. NO.	ISSUE	EQT. OR MTR. NUMBER	ACTION
Enwright Associates, Inc.	Process & Instrumentation Diagram	81004-CE-1	1			
	General Arrangement - Pretreatment Facilities	81004-CE-2	1			
	General Arrangement - Plating and Surface Prep Areas	81004-CE-3	1			
	Revised Engineering Report/Specifications					

TO	DISTRIBUTION	T	P	SEP
	Mr. Ed King Enviropact, Inc.	1	1	
	Mr. Pablo Prieto Metals Applied, Inc.	1		
	Mr. Ned Angene Cleveland Pneumatic (Florida)	1		
	Mr. Tim Aish Metals Applied, Inc.			

TO	DISTRIBUTION	T	P	SEP

TO	DISTRIBUTION	T	P	SEP
	CIVIL & SANITARY			
	ELECTRICAL			
	INSTRUMENTATION			
	H VAC			
	PROJECT MANAGER			
	RESIDENT ENGINEER			
	STRUCTURAL			
	File	1		

REMARKS

Additional copy of Revised Engineering Report, Plans, and Specifications issued for State of Florida approval.

Enviropact to deliver to Florida Department of Environmental Regulation P. O. Box 2858, West Palm Beach, Florida 33402.

ACTION CODES ▶ A – APPROVED; AN – APPROVED AS NOTED; RC – RETURNED FOR CORRECTION
ABBREVIATIONS T – TRANSMITTAL ONLY; P – PRINT; SEP – SEPIA

BY Rick C. Wilkey enwright associates, inc.
Rick C. Wilkey, P.E.

EA-1