Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION
One North University Drive, Suite A203, Plantation, Florida 33324
954-519-1260 • Fax 954-765-4804

November 21, 2012

ELECTRONIC MAIL – EMAIL Return Receipt Requested

Ms. Thamer Azule-Wright
Human Resources Director
Zumro Manufacturing, Inc.
650 S.W. 16th Terrace
Pompano Beach, Florida 33069

Re: Initial Title V Air Operation Permit
PROPOSED Permit No.: **0112706-004**-AV
Zumro Manufacturing, Inc.

Dear Ms. Azule–Wright:

One copy of the "PROPOSED Determination" for the Title V Air Operation Permit for the Zumro Manufacturing, Inc. facility located at 650 S.W. 16th Terrace, Pompano Beach, Broward County is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit. An electronic version of this determination has been posted on the Division of Air Resources Management's World Wide Web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is: "http://www.dep.state.fl.us/air/eproducts/ards/default.asp" Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Ms. Olga M. Ibarra, P.E. at 954-519-1275.

Sincerely,

Daniela Banu

Daniela Banu
Air Quality Program Administrator

DB/omi

Enclosures

copy furnished to:
Albert Webber, P.E. via email
Veronica Pickett, EPAC Environmental Services, Inc. via email
Manuel De Los Santos, SFDEP, Air Section, via email
Barbara Friday, BAR [barbara.friday@dep.state.fl.us] (for posting with Region 4 , U.S. EPA)

PROPOSED Determination

PROPOSED Permit No.: 0112706-004-AV
Page 1 of 1

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Ms. Thamer Azule-Wright, Human Resources Director for the Zumro Manufacturing, Inc. located at [650 S.W. 16th Terrace, Pompano Beach, Broward County was clerked on October 12, 2012. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Sun-Sentinel on October 18, 2012. The file has been available for public inspection at the Pollution Prevention, Remediation and Air Quality Division in Plantation. The Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on October 23, 2012.

II. Public Comment(s).

(1) No comments were received during the 30 (thirty) day public comment period. Since no comments were received, the DRAFT Permit becomes the PROPOSED Permit.

III. Conclusion.

(1) Since there were no comments received during the Public Notice period, no changes were made to the DRAFT Permit and the permitting authority hereby issues the PROPOSED Permit, No. 0112706-004-AV.

Zumro Manufacturing, Inc.

Facility ID No. 0112706

Broward County

Initial Title V Air Operation Permit

PROPOSED Permit No.: 0112706-004-AV

Permitting and Compliance Authority:

Pollution Prevention, Remediation and Air Quality Division

One North University Drive, Suite: 203

Plantation, Florida 33324-2038

Telephone: 954-519-1260

Fax: 954-519-1495

PROPOSED PERMIT

PERMITTEE:
Zumro Manufacturing, Inc.
650 S.W. 16th Terrace
Pompano Beach, Florida 33069

Permit No. 0112706-004-AV
Zumro Manufacturing, Inc.
Facility ID No. 0112706
Initial Title V Air Operation Permit

The purpose of this permit is for the Initial Title V air Operation permit for the above referenced facility. The Zumro Manufacturing, Inc. is located in Broward County at 650 S.W. 16th Terrace, Pompano Beach Florida. UTM Coordinates are: Zone 17, 585.54 Km East and 2900.56Km North. Latitude is: 26° 13' 19.5"; and, Longitude is: 80°8' 37.2" West. SIC code: 2399.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date:
Renewal Application Due Date:
Expiration Date:
Broward County, Pollution Prevention,
Remediation and Air
Quality Division

_____
Daniela Banu
Air Quality Program Administrator

DB/omi

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Statement of Basis

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

Zumro Manufacturing, Inc. is a manufacturer of temporary inflatable shelters and rescue pods. As part of the manufacturing process, adhesives containing Hazardous Air Pollutants identified as toluene, hexane and methanol are applied to the product material which is a fabric reinforced neoprene rubber. This operation is not equipped with air pollution control equipment, as only fugitive emissions occur during the application of adhesives. The manufacturing operation consists of the following principal steps: 1)adhesive containers are removed from the hazardous materials storage area, as needed, opened; 2) adhesive is applied to the portions of the neoprene fabric to be joined together; 3) toluene is wiped on the adhesive to activate the adhesive; 3) the pieces are joined together and pressure is applied to assure a seal; and 4)the containers are closed tightly and returned to the hazardous materials storage area upon completion of the adhesives application. There is no surface coating application associated with the process. The facility also utilizes a solvent distillation system to recover unused toluene from the manufacturing process and to reduce its generation of hazardous waste.

The facility has an Operation and Maintenance Plan which is part of the permit application. The facility exceeded the single HAP (toluene) emissions limit of 10 tons/year set in the FESOP, 0112706-001-AF. This facility does not have miscellaneous unregulated/ insignificant emissions units and/or activities.

Based on the initial Title V permit application received electronically via EPSAP on July 30, 2012, this facility is a major source of HAP. Compliance Assurance Monitoring (CAM) rule does not apply.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
001	One process/production unit consisting of adhesives application area. The material (fabric) is cut and then glued together to create the inflatable product. The adhesives are applied manually. The volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions resulting from this operation are fugitive in nature.
Unregulated Emissions Units and Activities	
	None

Subsection C. Applicable Regulations

Based on the Title V air operation permit application received electronically via EPSAP on July 30, 2012; and the construction permit application received via regular mail August 20, 2012, this facility is a major source of hazardous air pollutants (HAP). This operation is not subject to any National Emissions Standards of Hazardous Air Pollutants (NESHAPS) – 40 CFR 63.

Subsection D. Relevant Documents

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Appendix A .Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1: Permit History
Statement of Basis

These documents are on file with permitting authority:
Initial Title V Permit Application received electronically via EPSAP July 30, 2012.
Construction Permit Application received via regular mail August 20, 2012.

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.

FW4. General Pollutant Emission Limiting Standards. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
a. Tightly cover or close all VOC containers when they are not in use;
b. Tightly cover all open tanks, which contain VOCs when they are not in use;
c. Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition;
d. Confine rags used with VOCs to tightly closed, fireproof containers when not in use; and,
e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.
[Rule 62-296.320(1) (a), F.A.C., 0112706-003-AC]

FW4. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:
a. Paving and maintenance of roads, parking areas and yards.
b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
e. Landscaping or planting of vegetation.
f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
g. Confining abrasive blasting where possible.
h. Enclosure or covering of conveyor systems.
[Rule 62-296.320(4) (c), F.A.C., Permit No. 0112706-003-AC]

Annual Reports and Fees

FW5. Annual Operation Report (AOR). The AOR shall be submitted to the PPRAQD by April 1 of the following year. If the permittee elects to use FDEP's electronic annual operation report software (EAOR), the report must be submitted directly to FDEP and there is no requirement to submit a copy to PPRAQD. [Rule 62-210.370(3), F.A.C.]
{Permitting Note. Information on the EAOR submittal is available at http://www.dep.state.fl.us/air/emission/eaor/default.htm}

FW 6. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW 7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3) (a) 2. & 3. and (3) (b), F.A.C.]

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

FW9. General Prohibitions.

a) Circumvention. No person shall circumvent any air pollution device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
b) Concealment. No person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which could otherwise constitute a violation of any provisions of Broward County Code.
c) Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Code.

[Rule 62-210.650, F.A.C., Broward County Code, Sec. 27-175(b) and (d)]

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
001	One process/production unit consisting of adhesives application area. The material (fabric) is cut and then glued together to create the inflatable product. The adhesives are applied manually. The volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions resulting from this operation are fugitive in nature.

Recordkeeping and Reporting Requirements

A.1 VOC Content and Emissions: The permittee shall determine the VOC content of all materials, including solvents, and shall monitor the usage of such materials at the referenced emissions unit(s), by recording and maintaining the following information:
a. The VOC content for each material containing or emitting VOCs.
b. The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emissions unit(s).
c. The total monthly VOC emissions rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month.
d. A rolling consecutive 12-month total emissions rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.
[Rule 62-4.070(3) F.A.C., Permit No. 0112706-003-AC]

A.2. HAP Content and Emissions: The permittee shall determine the total and individual HAP contents of all materials, including solvents, and shall monitor the usage of such materials at the referenced emissions unit(s), by recording and maintaining the following information:
a. The individual and total HAP contents for each material containing or emitting HAPs.
b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emissions unit(s).
c. The individual and total monthly HAP emissions rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.
d. A rolling consecutive 12-month total emissions rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months.
[Rule 62-4.070(3) F.A.C., Permit No. 0112706-003-AC]

A.3 A log shall be kept to document the amount of chemicals manifested to recyclers, the manufacturer, or landfilled.
[Rule 62-4.070(3) F.A.C., Permit No. 0112706-003-AC]

A.4 Semiannual Monitoring Reports: The permittee shall submit to the PPRAQD, Air Quality Program, a report of all required monitoring every 6 months. All instances of deviations from permit requirements must be clearly identified in such reports. The responsible official shall certify each report to be true, accurate, and complete based on the information submitted and belief formed after the reasonable inquiry. The reports shall be completed and submitted to the PPRAQD on or before the deadline specified in Table A.1.
below:

Table A.1. Dates for Semiannual Monitoring Reports

Reporting Period	Report Deadline
July through December	January 31st
January through June	July 31st

[Rule 62-213.440(1)(b)3 F.A.C.]

A.5. Supporting Documentation: Supporting documentation, such as Material Safety Data Sheets (MSDS), purchase orders, etc., shall be kept, which includes sufficient information, to determine compliance. The log and documents shall be kept for at least 5years and made available to the PPRAQD. Monthly logs shall be completed within 10 calendar days after completion of the preceding month.
[Rule 62-4.070(3) and 62-213.440(1)(b)2b F.A.C., Permit No. 0112706-003-AC]

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Appendix TV- 5, TITLE V General Conditions (version dated 02/16/2012)
Appendix H-1: Permit History
Appendix A: Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix B. Operation and Maintenance Plan

Zumro Manufacturing Inc.
Pompano Beach, Florida
Broward County, Florida

Initial Title V Air Operation Permit

PROPOSED Permit Project No.: 0112706-004-AV

APPLICANT

The applicant for this project is Zumro Manufacturing, Inc. The applicant's responsible official and mailing address are: Ms. Thamer Azule-Wright, Human Resources Director at 650 S.W. 16th Terrace, Pompano Beach, Florida 33069-4533.

FACILITY DESCRIPTION

Zumro Manufacturing, Inc. is a manufacturer of temporary inflatable shelters and rescue pods. This facility uses a significant amount of toluene. As part of the manufacturing process, adhesives containing EPA Hazardous Air Pollutants identified as toluene, hexane and methanol are applied to the inflatable material(s). This operation is not equipped with air pollution control equipment, as only fugitive emissions occur during the application of adhesives. The operation requires adhesives application and it is performed as follows: adhesive containers are removed from the hazardous materials storage area, as needed, opened and applied to the inflatable material. This process releases fugitive emissions. The containers are closed tightly and returned to the hazardous materials storage area upon completion of the adhesives application.
There is no surface coating application associated to this operation.

Zumro Manufacturing, Inc. has an Operations and Maintenance Plan which it is part of the permit application.

The facility previously operated as a Synthetic Minor Source with the following emissions limits: 25 TPY of Total HAP, 10 TPY of individual HAP and 100 TPY of VOC. Since this facility exceeded the individual HAP emissions limit of 10 tons/year for toluene, set in the FESOP, 0112706-001-AF, it is currently a Title V Major Source; and these emissions limits are no longer necessary. Therefore, the construction permit appropriately modifies the facility's emissions limits.

This permit does not include miscellaneous insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to obtain the initial TV air operation permit. No modification(s) from previous permit (0112706-001-AF) is/are requested.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application to obtain the initial TV air operation permit was received electronically July 30, 2012; it was withdrawn pending receipt the construction permit application. It was received on August 20, 2012. At that time, the permit application process was initiated. The professional engineer authentication code and R.O. certification were received September 19, 2012.

PRIMARY REGULATORY REQUIREMENTS

Broward County Chapter 27 – Pollution Control, Article IV Air Quality

Florida Administrative Code
62.4.070(3) – Reasonable Assurance
62-296.320(2) - Objectionable Odor Rule.
62-296.320(1) (a) – VOC or Organic Solvent Emissions.

Federal Regulations

There is a NESHAP/MACT that this operation would be subject at the present time.

CAM Rule Applicability Analysis:

CAM applies to each pollutant specific emissions unit that meets the four criteria listed below:

1. The emissions unit (EU) must be located at a major source which is required to have a major source (Title V) permit: EU #001 is located at a major source (TV source) for HAP.
2. The EU must be subject to emissions limitations or standards for an applicable regulated air pollutant. This includes a limit set in a permit condition.
   EU #001 is not subject to a NESHAP or any other EPA/DEP promulgated rule. EU #001 does not have an emissions cap for toluene or any other HAP subject to a specific applicable rule.
3. The EU must use an add-on control device to achieve compliance with an emission limit or standard. EU #001 is not equipped with a pollution control device to achieve compliance.
4. The EU must have "potential pre-control device emissions" equal to or greater than the amount required for a source to be classified as a major source in the Title V Program. Typically, this means uncontrolled emissions would exceed 100 tons per year for a criteria pollutant, or exceed 10 tons per year for a hazardous air pollutant. All emissions are uncontrolled, since this operation does not have pollution control device. The potential HAP emissions exceed the major source threshold.

   CAM rule requires owners or operators to monitor the operation and maintenance of their control device(s) and report whether or not their facilities meet emissions standards. This facility does not meet the four criteria; therefore CAM does not apply at this time.

PROJECT REVIEW

This project is to obtain the initial TV air operation permit.

The facility consists of the following emissions unit:

E.U. ID No.	Brief Description
001	One process/production unit consisting of adhesives application area. The material (fabric) is cut and then glued together to create the inflatable product. The adhesives are applied manually. The volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions resulting from this operation are fugitive in nature.

CONCLUSION

Based on the FESOP issued November 6, 2008, this facility was a Synthetic Major Source of HAP and the Title III program. The facility exceeded the single HAP emissions limit of 10 tons/year verified through the 2011 Annual Operation Report (AOR) and it is now required to obtain a major source (TV) permit. Zumro Manufacturing, Inc. becomes a major source under the Title V Operating Permit Program. Compliance Assurance Monitoring (CAM) does not apply.

This initial Title V Air Operation Permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213.

ABBREVIATIONS, ACRONYMS, CITATIONS AND IDENTIFICATION NUMBERS

Abbreviations and Acronyms:

° F: degrees Fahrenheit

acfm: actual cubic feet per minute

AOR: Annual Operating Report

ARMS: Air Resource Management System (Department's database)

BACT: best available control technology

Btu: British thermal units

CAA: Clean Air Act

CAAA: Clean Air Act Amendments of 1990

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

CO: carbon monoxide

COMS: continuous opacity monitoring system

DARM: Division of Air Resources Management

DCA: Department of Community Affairs

DEP: Department of Environmental Protection

Department: Department of Environmental Protection

dscfm: dry standard cubic feet per minute

EPA: Environmental Protection Agency

ESP: electrostatic precipitator (control system for reducing particulate matter)

EU: emissions unit

F.A.C.: Florida Administrative Code

F.D.: forced draft

F.S.: Florida Statutes

FGR: flue gas recirculation

Fl: fluoride

ft^2: square feet

ft^3: cubic feet

gpm: gallons per minute

gr: grains

HAP: hazardous air pollutant

Hg: mercury

I.D.: induced draft

ID: identification

ISO: International Standards Organization (refers to those conditions at 288 Kelvin, 60% relative humidity and 101.3 kilopascals pressure.)

kPa: kilopascals

LAT: Latitude

lb: pound

lbs/hr: pounds per hour

LONG: Longitude

MACT: maximum achievable technology

mm: millimeter

MMBtu: million British thermal units

MSDS: material safety data sheets

MW: megawatt

NESHAP: National Emissions Standards for Hazardous Air Pollutants

NO_X: nitrogen oxides

NSPS: New Source Performance Standards

O&M: operation and maintenance

O_2: oxygen

ORIS: Office of Regulatory Information Systems

OS: Organic Solvent

Pb: lead

PM: particulate matter

PM_{10}: particulate matter with a mean aerodynamic diameter of 10 microns or less

PSD: prevention of significant deterioration

psi: pounds per square inch

PTE: potential to emit

RACT: reasonably available control technology

RATA: relative accuracy test audit

RMP: Risk Management Plan

RO: Responsible Official

SAM: sulfuric acid mist

scf: standard cubic feet

scfm: standard cubic feet per minute

SIC: standard industrial classification code

SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)

SOA: Specific Operating Agreement

SO_2: sulfur dioxide

TPH: tons per hour

TPY: tons per year

UTM: Universal Transverse Mercator coordinate system

VE: visible emissions

VOC: volatile organic compounds

x: By or times

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers and ID numbers.

Code of Federal Regulations:

Example: **[40 CFR 60.334]**

Where:	40	refers to	Title 40
	CFR	refers to	Code of Federal Regulations
	60	refers to	Part 60
	60.334	refers to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: **[Rule 62-213.205, F.A.C.]**

Where:	62	refers to	Title 62
	62-213	refers to	Chapter 62-213
	62-213.205	refers to	Rule 62-213.205, F.A.C.

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where:

105 = 3-digit number code identifying the facility is located in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where:

AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is located in Polk County
0221= 4-digit number assigned by permit tracking database
001 or 002= 3-digit sequential project number assigned by permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where:

PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC53 = old Air Construction Permit numbering identifying the facility is located in Polk County

APPENDIX B

Operation and Maintenance Plan

The owner or operator of this facility will review and evaluate this Spill Prevention and Control Plan every twelve months.
Revisions to this plan will be completed within three months of any commencement of construction, closure or alteration of any facility or alteration of the operating procedures at that facility that may cause or be a source of air pollution, or that may eliminate, reduce or control pollution of the air.
Changes requiring amendment to this plan include, but are not limited to the following conditions:
• the facility permit is revised;
• the plan fails;
• the facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for air pollution;
• standard operation or maintenance procedures at the facility are revised to include more effective control technology if such technology will significantly reduce the likelihood of air pollution and if such technology has been field proven at the time of the review.

Records regarding all aspects of this operation and maintenance plan will be retained by the facility owner for a period of five years.

General Information
This facility operates as a manufacturer of temporary inflatable shelters and rescue pods. As part of the manufacturing process, adhesives containing EPA Hazardous Air Pollutants identified as toluene, hexane and
methanol are applied to the inflatable material(s). The adhesive application releases fugitive emissions of these volatile organic compounds (VOCs).

Operation Plan
• Adhesive application is only to be performed at designated adhesive application areas within the facility building. No adhesive use is permitted outside of these designated areas.
• Adhesive application is limited to normal facility operating hours with employee supervision provided by a designated manager/supervisor.
• All employees authorized to perform adhesive application must be trained as to the proper use, storage and handling procedures.
• Records of employee training should be maintained on-site and readily available for review by a regulatory official.

Maintenance Plan
• All adhesive containers shall be stored within a flame retardant cabinet.

• All adhesive containers shall be properly sealed to eliminate the potential for fugitive emissions when not in use.

• Adhesive storage cabinets shall be properly maintained and inspected by managing personnel on a weekly basis.
• Records of spills, leaks or cabinet replacement(s) shall be maintained on-site and readily available for review by a regulatory official.

TITLE V GENERAL CONDITIONS

(Version Dated 02/16/2012)

Operation

TV1. General Prohibition. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit. [Rule 62-4.030, Florida Administrative Code (F.A.C.)]

TV2. Validity. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department. [Rule 62-4.160(2), F.A.C.]

TV3. Proper Operation and Maintenance. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules. [Rule 62-4.160(6), F.A.C.]

TV4. Not Federally Enforceable. Health, Safety and Welfare. To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. [Rule 62-4.050(3), F.A.C.]

TV5. Continued Operation. An applicant making timely and complete application for permit, or for permit renewal, shall continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, and in accordance with applicable requirements of the Acid Rain Program and applicable requirements of the CAIR Program, until the conclusion of proceedings associated with its permit application or until the new permit becomes effective, whichever is later, provided the applicant complies with all the provisions of subparagraphs 62-213.420(1)(b)3., F.A.C. [Rules 62-213.420(1)(b)2., F.A.C.]

TV6. Changes Without Permit Revision. Title V sources having a valid permit issued pursuant to Chapter 62-213, F.A.C., may make the following changes without permit revision, provided that sources shall maintain source logs or records to verify periods of operation:

a. Permitted sources may change among those alternative methods of operation allowed by the source's permit as provided by the terms of the permit;
b. A permitted source may implement operating changes, as defined in Rule 62-210.200, F.A.C., after the source submits any forms required by any applicable requirement and provides the Department and EPA with at least 7 days written notice prior to implementation. The source and the Department shall attach each notice to the relevant permit;
   (1) The written notice shall include the date on which the change will occur, and a description of the change within the permitted source, the pollutants emitted and any change in emissions, and any term or condition becoming applicable or no longer applicable as a result of the change;
   (2) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes;
c. Permitted sources may implement changes involving modes of operation only in accordance with Rule 62-213.415, F.A.C.

[Rule 62-213.410, F.A.C.]

TV7. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

Compliance

TV8. Compliance with Chapter 403, F.S., and Department Rules. Except as provided at Rule 62-213.460, Permit Shield, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules. [Rule 62-4.070(7), F.A.C.]

TV9. Compliance with Federal, State and Local Rules. Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of a facility or an emissions unit from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Department or any other such requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

TV10. Binding and enforceable. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions. [Rule 62-4.160(1), F.A.C.]

TV11. Timely information. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly. [Rule 62-4.160(15), F.A.C.]

TV12. Halting or reduction of source activity. It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity. [Rule 62-213.440(1)(d)3., F.A.C.]

TV13. Final permit action. Any Title V source shall comply with all the terms and conditions of the existing permit until the Department has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C. [Rule 62-213.440(1)(d)4., F.A.C.]

TV14. Sudden and unforeseeable events beyond the control of the source. A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference. [Rule 62-213.440(1)(d)5., F.A.C.]

TV15. Permit Shield. Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall, as of the effective date of the permit, be deemed compliance with any applicable requirements in effect, provided that the source included such applicable requirements in the permit application. Nothing in this condition or in any permit shall alter or affect the ability of EPA or the Department to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program or the CAIR Program. [Rule 62-213.460, F.A.C.]

TV16. Compliance With Federal Rules. A facility or emissions unit subject to any standard or requirement of 40 CFR, Part 60, 61, 63 or 65, adopted and incorporated by reference at Rule 62-204.800, F.A.C., shall comply with such standard or requirement. Nothing in this chapter shall relieve a facility or emissions unit from complying with such standard or requirement, provided, however, that where a facility or emissions unit is subject to a standard established in Rule 62-296, F.A.C., such standard shall also apply. [Rule 62-296.100(3), F.A.C.]

Permit Procedures

TV17. Permit Revision Procedures. The permittee shall revise its permit as required by Rules 62-213.400, 62-213.412, 62-213.420, 62-213.430 & 62-4.080, F.A.C.; and, in addition, the Department shall revise permits as provided in Rule 62-4.080, F.A.C. & 40 CFR 70.7(f).

TV18. Permit Renewal. The permittee shall renew its permit as required by Rules 62-4.090, 62.213.420(1) and 62-213.430(3), F.A.C. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information

identified in Rules 62-210.900(1) [Application for Air Permit - Long Form], 62-213.420(3) [Required Information], 62-213.420(6) [CAIR Part Form], F.A.C. Unless a Title V source submits a timely and complete application for permit renewal in accordance with the requirements this rule, the existing permit shall expire and the source's right to operate shall terminate. For purposes of a permit renewal, a timely application is one that is submitted 225 days before the expiration of a permit that expires on or after June 1, 2009. No Title V permit will be issued for a new term except through the renewal process. [Rules 62-213.420 & 62-213.430, F.A.C.]

TV19. Insignificant Emissions Units or Pollutant-Emitting Activities. The permittee shall identify and evaluate insignificant emissions units and activities as set forth in Rule 62-213.430(6), F.A.C.

TV20. Savings Clause. If any portion of the final permit is invalidated, the remainder of the permit shall remain in effect. [Rule 62-213.440(1)(d)1., F.A.C.]

TV21. Suspension and Revocation.

a. Permits shall be effective until suspended, revoked, surrendered, or expired and shall be subject to the provisions of Chapter 403, F.S., and rules of the Department.
b. Failure to comply with pollution control laws and rules shall be grounds for suspension or revocation.
c. A permit issued pursuant to Chapter 62-4, F.A.C., shall not become a vested property right in the permittee. The Department may revoke any permit issued by it if it finds that the permit holder or his agent:
   (1) Submitted false or inaccurate information in his application or operational reports.
   (2) Has violated law, Department orders, rules or permit conditions.
   (3) Has failed to submit operational reports or other information required by Department rules.
   (4) Has refused lawful inspection under Section 403.091, F.S.
d. No revocation shall become effective except after notice is served by personal services, certified mail, or newspaper notice pursuant to Section 120.60(5), F.S., upon the person or persons named therein and a hearing held if requested within the time specified in the notice. The notice shall specify the provision of the law, or rule alleged to be violated, or the permit condition or Department order alleged to be violated, and the facts alleged to constitute a violation thereof.

[Rule 62-4.100, F.A.C.]

TV22. Not federally enforceable. Financial Responsibility. The Department may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and Department rules. [Rule 62-4.110, F.A.C.]

TV23. Emissions Unit Reclassification.

a. Any emissions unit whose operation permit has been revoked as provided for in Chapter 62-4, F.A.C., shall be deemed permanently shut down for purposes of Rule 62-212.500, F.A.C. Any emissions unit whose permit to operate has expired without timely renewal or transfer may be deemed permanently shut down, provided, however, that no such emissions unit shall be deemed permanently shut down if, within 20 days after receipt of written notice from the Department, the emissions unit owner or operator demonstrates that the permit expiration resulted from inadvertent failure to comply with the requirements of Rule 62-4.090, F.A.C., and that the owner or operator intends to continue the emissions unit in operation, and either submits an application for an air operation permit or complies with permit transfer requirements, if applicable.
b. If the owner or operator of an emissions unit which is so permanently shut down, applies to the Department for a permit to reactivate or operate such emissions unit, the emissions unit will be reviewed and permitted as a new emissions unit.

[Rule 62-210.300(6), F.A.C.]

TV24. Transfer of Permits. Per Rule 62-4.160(11), F.A.C., this permit is transferable only upon Department approval in accordance with Rule 62-4.120, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility. The permittee shall also comply with the

requirements of Rule 62-210.300(7), F.A.C., and use DEP Form No. 62-210.900(7). [Rules 62-4.160(11), 62-4.120, and 62-210.300(7), F.A.C.]

Rights, Title, Liability, and Agreements

TV25. Rights. As provided in Subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither 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. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit. [Rule 62-4.160(3), F.A.C.]

TV26. Title. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title. [Rule 62-4.160(4), (F.A.C.]

TV27. Liability. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department. [Rule 62-4.160(5), F.A.C.]

TV28. Agreements.

a. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
   (1) Have access to and copy any records that must be kept under conditions of the permit;
   (2) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
   (3) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
b. 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
c. The 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.

[Rules 62-4.160(7), (9), and (10), F.A.C.]

Recordkeeping and Emissions Computation

TV29. Permit. The permittee shall keep this permit or a copy thereof at the work site of the permitted activity. [Rule 62-4.160(12), F.A.C.]

TV30. Recordkeeping.

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
c. Records of monitoring information shall include:

(1) The date, exact place, and time of sampling or measurements, and the operating conditions at the time of sampling or measurement;
(2) The person responsible for performing the sampling or measurements;
(3) The dates analyses were performed;
(4) The person and company that performed the analyses;
(5) The analytical techniques or methods used;
(6) The results of such analyses.

[Rules 62-4.160(14) and 62-213.440(1)(b)2., F.A.C.]

TV31. Emissions Computation. Pursuant to Rule 62-210.370, F.A.C., the following required methodologies are to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with Rule 62-210.370, F.A.C. Rule 62-210.370, F.A.C., is not intended to establish methodologies for determining compliance with the emission limitations of any air permit.

For any of the purposes specified above, the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.

a. *Basic Approach.* The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
   (1) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
   (2) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
   (3) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
b. *Continuous Emissions Monitoring System (CEMS).*
   (1) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
      (a) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or,
      (b) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
   (2) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
      (a) A calibrated flowmeter that records data on a continuous basis, if available; or

(b) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.

(3) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.

c. *Mass Balance Calculations.*

(1) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:

(a) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and,

(b) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.

(2) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.

(3) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.

d. *Emission Factors.*

(1) An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.

(a) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.

(b) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.

(c) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.

(2) If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.

e. *Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS.* In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of

missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.

f. *Accounting for Emissions During Periods of Startup and Shutdown.* In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.

g. *Fugitive Emissions.* In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.

h. *Recordkeeping.* The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(1) & (2), F.A.C.]

Responsible Official

TV32. Designation and Update. The permittee shall designate and update a responsible official as required by Rule 62-213.202, F.A.C.

Prohibitions and Restrictions

TV33. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

TV34. Refrigerant Requirements. Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed at 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or Class II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts B and F, and with Chapter 62-281, F.A.C.

TV35. Open Burning Prohibited. Open burning is prohibited unless performed in accordance with the provisions of Rule 62-296.320(3) or Chapter 62-256, F.A.C.

Appendix H-1: Permit History

[Zumro Manufacturing, Inc.]
[Zumro Manufacturing – Pompano Beach]

PROPOSED Permit No.: [0112706-004-AV]
Facility ID No.: [0112706]

E.U. ID No.	Description	Permit No.	Effective Date	Expiration Date	Project Type [1]
001	Temporary Inflatables Shelters and Rescue Pods Manufacturing Operation.	**[0112706-001-AF]**	November 6, 2008	June 11 ,2012	FESOP (Initial)
001	Temporary Inflatables Shelters and Rescue Pods Manufacturing Operation.	**[0112706-004-AV]**	xxx/xx/xxxx	xxx/xx/xxxx	TV Initial
001	Temporary Inflatables Shelters and Rescue Pods Manufacturing Operation.	**[0112706-003-AC]**	xxx/xx/xxxx	August 20/2013	Construction Permit

[1] Project Type (select one): Title V: Initial, Revision, Renewal, or Admin. FESOP, Correction; Construction (new or mod.); or, Extension (AC only).