~~Zumro Manufacturing, Inc.~~
Air Shelters USA, LLC

Facility ID: 0112706
Broward County

DRAFT Title V Air Operation Permit Renewal

Permit No.: 0112706-006-AV
(Renewal of Title V Air Operation Permit No. 0112706-004-AV)

Permitting and Compliance Authority:
Broward County Environmental Protection and Growth Management Department
~~Broward County Pollution Prevention, Remediation and Air Quality Division (PPRAQD)~~
Environmental Engineering and Permitting Division (EEPD)
~~One~~ 1 North University Drive, ~~Suite 203~~ Mailbox 201, Plantation, Florida 33324
Telephone: 954-519-1483 ~~519-1220*~~
Fax: 954-519-1495

Title V Air Operation Permit Renewal

DRAFT Permit Project No.: 0112706-006-AV

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~~Statement of Basis~~

Statement of Basis

Environmental Protection and Growth Management Department
ENVIRONMENTAL ENGINEERING AND PERMITTING DIVISION
1 North University Drive, Mailbox 201, Plantation, Florida 33324
954-519-1483 • FAX 954-519-1495

Permittee:
Dusky Marine, Inc.
110 N. Bryan Road
Dania Beach, Florida 33004

DRAFT Permit No.: 0112706-006-AV
Facility: Air Shelters USA, LLC
Facility ID No.: 0112706
SIC No(s).: 23,, 239, 2399 **NAICS:** 313949
Project: Title V Air Operation Permit Renewal

Authorized Representative
Mike Brown, Vice President

The purpose of this permit is to renew the Title V air operation permit, ~~for the above-referenced facility~~, 0112706-004-AV issued on January 13, 2013, for ~~the Zumro Manufacturing, Inc.~~ Air Shelters USA, LLC (formerly Zumro Manufacturing, Inc.) which is located in Broward County at 650 S.W. 16th Terrace, Pompano Beach, Florida 33069-4533. UTM Coordinates are: Zone: 17, 585.54 Km East, 2900.56 Km North. Latitude: 26° 13' 19.5" North and Longitude: 80° 08'37.2" West. There are no changes to the applicable requirements or the regulatory classification of the facility.

This Title V Air Operation Permit Renewal 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. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Effective Date:
Renewal Application Due Date:
Expiration Date:

_____
~~Daniela Banu~~
~~Air Quality Program Administrator~~
Robert C. Wong
Environmental Licensing Supervisor
Broward County Environmental Engineering and Permitting Division

SECTION I. FACILITY INFORMATION

Subsection A. Facility Description.

~~Zumro Manufacturing, Inc.~~ Air Shelters USA, LLC 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 inflatable material ~~product material~~ which is a fabric reinforced neoprene rubber. These chemicals are identified by the U.S. Environmental Protection Agency (EPA) as Hazardous Air Pollutants (HAPs). 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;
4) the pieces are joined together and pressure is applied to assure a seal; and
5) 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. Air Shelters USA, LLC has an Operations and Maintenance Plan ~~which 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 0112706-003-AC issued on November 15, 2012, appropriately modified the facility's emission limits.

~~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. The Compliance Assurance Monitoring (CAM) rule does not apply

Subsection B. Summary of Emissions Unit ID No. and Brief Descriptions

Section	EU No.	Brief Description
[A]	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 (HAPs) 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.~~

SECTION I. FACILITY INFORMATION

Based on a review of the Title V air operation permit renewal application received on August 23, 2017, it was concluded that the facility is:

1. A major (Title V) source of hazardous air pollutants (HAPs) due to Potential to Emit (PTE)
2. A synthetic minor source of volatile organic compounds (VOCs)

The facility is NOT:

- A major source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. Potential HAP emissions are 84 tons per year (TPY) which is below the PSD threshold of 250 TPY
- Operating units subject to the New Source Performance Standards (NSPS) of 40 CFR 60
- Subject to Compliance Assurance Monitoring (CAM) for any of the units at the facility
- Subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.
- Operating units subject to the acid rain provisions of the Clean Air Act

Primary Applicable Regulations	EU No(s)
Federal Rule Citations	
N/A	N/A
State Rule Citations	
Rule 62-213 F.A.C. - Operating Permits for Major Sources of Air Pollution	EU 001/ Facility- Wide
Rule 62-296.320(1) (a) F.A.C. - VOC or Organic Solvent Emissions	EU 001/Facility -Wide
Rule 62-296.320(2) F.A.C. - Objectionable Odor*	EU 001/Facility-Wide
Rule 62-210-650 F.A.C. Circumvention of Air Pollution Control Equipment	Facility-wide
Rule 62-4.030 F.A.C. - General Prohibition	
Rule 62-210.300 (2) (a) 2 F.A.C. – Minimum Requirements for All Air Operation Permits	
Rule 62-4.070(3) F.A.C. Reasonable Assurance	EU 001
County Rule Citations	
Broward County Chapter 27 Air Pollution Control, Article IV, Sec. 27-175 (b) Concealment* & (d) Maintenance*	Facility-wide

**Not Federally Enforceable*

~~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~~
~~Statements 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 the emissions unit 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.]

{Permitting Note. The following attachments provide information for convenience purposes only and do not supersede any of the terms or conditions of this permit: H-1 (Permit History)

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 (220) (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 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.~~

FW34. General Pollutant Emission Limiting Standards, 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, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by ~~the Department~~ EEPD.
[Rule 62-296.320(1), F.A.C.]

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. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4) (b), F.A.C.]

FW5. 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 entrainment, 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]

FW6 ~~**FW10.**~~ 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. [Rule 62-210.650, F.A.C.]
b) Concealment. Any stationary installation which will reasonably be expected to be a source of pollution shall obtain an appropriate and valid permit, unless exempted by rule. Furthermore, n~~N~~o 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 applicable provisions. ~~of Broward County Code~~.[Rule 62-3.030, F.A.C. and Broward County Code, Sec. 27-175(b)]
c) Maintenance. No person shall operate any air pollution control equipment or systems without proper ~~and sufficient~~ maintenance to assure compliance with applicable emission limits. ~~Broward County Code.~~

[Rule 62-210.300(2) (a) 2, ~~650~~, F.A.C., Broward County Code, Sec. 27-175~~(b) and~~ (d)]

~~**FW6**. 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 7. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available 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. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]
{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after

reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by April 1st each year}***

~~**FW10.** 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 8. Annual Statement of Compliance. The owner or operator 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.]

FW 9. 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 electronically through EPA's Central Data Exchange system at the following address: https://cdx.epa.gov. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: http://www.epa.gov/osweroe1/content/rmp/index.htm. The RMP Reporting Center can be contacted at: 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]

FW 10. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

FW 11. When the EEPD after investigation, has good reason (such as complaints, increased emissions or failure to properly maintain control equipment) to believe that any applicable requirement or permit condition is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EEPD. [Rules 62-297.310(7) (b) and 62-4.070(3), F.A.C.]

FW 12. At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the EEPD, unless shorter notice is agreed to by the EEPD. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the EEPD a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the EEPD by mutual agreement. [Rule 62-297.310(9), F.A.C.

The specific conditions in this section apply to 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.

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.
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~~ EEPD, Air Licensing and Compliance Section 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~~ EEPD, Air Licensing and Compliance Section on or before the deadline specified in Table A.1. on the next page.

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~~ include~~s~~ sufficient information, to determine compliance. The log and documents shall be kept for at least 5 years and upon request made available to the ~~PPRAQD~~ EEPD. 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]