Title V Air Operation Permit Renewal
Permit No. 0112706-006-AV

## APPLICANT

The applicant for this project is Air Shelters USA, LLC. The applicant's responsible official and mailing address is: Ms. Thamer Azule-Wright, HR manager/Purchasing, 650 S.W. 16th Terrace, Pompano Beach, Florida 33069-4533.

## FACILITY DESCRIPTION

Air Shelters USA, LLC manufactures temporary inflatable shelters and rescue pods. As part of the manufacturing process, adhesives containing toluene, hexane and methanol are applied to the inflatable material(s). These chemicals are identified by the U.S. Environmental Protection Agency (EPA) as Hazardous Air Pollutants (HAP). The operation is not equipped with air pollution control equipment, as only fugitive emissions occur during the application of adhesives. The operation is as follows: adhesive containers are removed from the hazardous materials storage area, opened and applied to the inflatable material, the containers are subsequently closed tightly and returned to the hazardous materials storage area upon completion of the adhesives application. There is no surface coating application associated with this operation. Air Shelters USA, Inc. also has an Operations and Maintenance Plan.

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 the facility exceeded the individual HAP emissions limit of 10 TPY for toluene (limit set in the initial Federally Enforceable State Operation Permit (FESOP) 0112706-001-AF) it is classified as a Title V Major Source; and the above HAP and VOC emissions limits are no longer applicable. Construction permit 0112706-003-AC issued on November 15, 2012, appropriately modified the facility's emission limits.

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

| 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. |

## APPLICABLE REGULATIONS

Florida Administrative Code

Rule 62.4.070(3) – Reasonable Assurance.
Rule 62-296.320(2) - Objectionable Odor Rule.
Rule 62-296.320(1) (a) – VOC or Organic Solvent Emissions
Rule 62-210-650 - Circumvention of air pollution control equipment

Federal Regulations

The facility is currently not subject to any NESHAP/MACT operation requirements.

*CAM Rule Applicability Analysis:*

CAM applies to each pollutant specific emissions unit that meets the four criteria listed on the next page:

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 above four criteria; therefore CAM does not apply at this time.

**The facility:**

- Is a major source (Title V of hazardous air pollutants (HAPs). The potential emissions are greater than 10 tons per year (TPY) for single HAP and greater than 25 TPY for total HAPs.
- Is a synthetic minor source of volatile organic compounds (VOCs)
- Does not operate units subject to the acid rain provisions of the Clean Air Act (CAA)
- Is not a major Prevention of Significant Deterioration (PSD) air pollution source
- Does not operate units subject to the New Source Performance Standards (NSPS) of 40 CFR 60
- Is not subject to the Clean Air Interstate Rule (CAIR), set forth in Rule 62-296.470, Florida Administrative Code (F.A.C.)
- Is not identified as a major source of greenhouse gas (GHG) pollutant.

| **Summary of Primary Applicable Regulations** | **EU No(s)** |
|---|---|
| *Federal Rule Citations* | |
| N/A | N/A |
| *State Rule Citations* | |
| Rule 62-213, F.A.C. Title V major source of HAPs | EU 001/ Facility- Wide |
| Rule 62-296.320(1) (a) F.A.C. Synthetic minor source of 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 62-4.070(3) – Reasonable Assurance | EU 001 |
| *County Rule Citations* | |
| Broward County Chapter 27 Air Pollution Control, Article IV, Sec. 27-175(b) & (d) ** | Facility-Wide |

****** Not Federally Enforceable

## PROJECT DESCRIPTION

The purpose of this permitting project is to renew TV Air Operation Permit 0112706-004-AV. No changes to the previous permit are requested and there are no additional applicable requirements. The facility is classified as follows: Standard Industrial Classification (SIC) Code: 2399 – Fabricated Textile Products, North American Industry Classification System (NAICS): 314999 - All other Miscellaneous Textile Products.

## PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received on August 23, 2017, Completeness Review done on October 20, 2017, Determine Agency Action done on November 21, 2017.

## PROJECT REVIEW

The only permit revision since the issuance of renewal Air Operating Permit No. 0112706-004-AV was the name change from Zumro Manufacturing, Inc. to Air Shelters USA, LLC. (0112706-005-AV) . Inspection records and compliance reports show that the facility has been operating in compliance with permit requirements. Details of the project are found in the Technical Evaluation and Preliminary Determination (TEPD). This project does not change the permitting requirements or the regulatory classification of the facility as a major Title V source for HAPs. No changes to facility equipment or operations has been requested by the applicant. Changes to the permit language made part of this renewal are shown in ~~strike through~~ format for deletions and in double underline format for additions. For ease of identification, these changes have been highlighted in yellow in the draft permit document.

## CONCLUSION

This project renews the Title V air operation permit No. 0112706-004-AV, which was effective on January 11, 2013. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.