TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Jabil Circuit, Inc.
10500 Dr. Martin Luther King Jr. Street North
St. Petersburg, FL 33716

Jabil Circuit (MLK Facility)

Facility ID No. 1030278

PROJECT

Project No. 1030278-015-AC
Application for Minor Air Construction Permit
Project Name: Increase HAPs Emissions Limit

COUNTY

Pinellas County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air and Solid Waste Permitting
Southwest District Office
Temple Terrace, Florida 33637-0926

October 3, 2014

Prepared by Danny Stubbs

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Facility Description:

This facility produces printed circuit boards.

II. Project Description:

A. Applicant:

Ms. Joann Lozano, EHS Supervisor
Jabil Circuit, Inc.
10500 Dr. Martin Luther King Jr. Street North
St. Petersburg, FL 33716

B. Professional Engineer:

Mr. Robert E. Wallace, III, P.E.
Environmental Engineering Consultants, Inc.
5119 N. Florida Ave.
Tampa, Florida 33603

C. Project Location:

The facility is located at 10500 Dr. Martin Luther King Jr. Street North in St. Petersburg, FL

D. Project Summary:

This project will increase the total HAPs emissions limit for the facility's Printed Circuit Board Manufacturing Operation (Emissions Unit No. 003) from 2.0 to 6.9 tons per any consecutive 12 month period. The facility is planning to go from one shift to two shifts of operations and as a result, production and emissions will increase.

E. Application Information:

Application Received on: 8/29/2014
Additional Information Requested on:
Additional Information Received on:
Application Complete on:

III. Applicable State and Federal Regulations

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	this process could to be a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	circuit board printing operations are a source of VOCs
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Pinellas County is an air quality maintenance area for ozone; however, there are no applicable source categories.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	there is no applicable source category
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	there is no applicable source category
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Testing is not required. Compliance is demonstrated via recordkeeping.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
VOC	003 - Printed Circuit Board Manufacturing	15.0	15.0
Total HAP	003 - Printed Circuit Board Manufacturing	6.9	6.9
Lead (PB)	003 - Printed Circuit Board Manufacturing	<0.12*	n/a

** Potential emissions for lead are from a previous permit application which was submitted to the Department on 3/24/2008 for Project No. 1030278-011-AC. Potential emissions of lead were estimated assuming no more than 1% of the lead used in the wave solder machines is released to the exhaust system, a maximum bar solder usage rate of 70,000 pounds/year, and a solder bar lead content of 35%. Information provided in an email from the applicant dated 10/1/2014 indicates the actual solder usage and lead emissions are much lower than the estimates assumed in the 3/24/2008 application.*

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air & Solid Waste Permitting Program, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).