Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

Morgan Truck Body, LLC
P.O. Box 588
Morgantown, PA 19543

Authorized Representative:
Mr. Pete Egberts, Vice President Operations

Air Permit No. 1050369-004-AO
Permit Expires: 05/11/2017
Site Name: Morgan Corporation
Minor Air Operation Permit
Project Name: Operation Permit Renewal

This is the final permit to renew air operation permit No. 1050369-003-AO for a surface coating facility at the Morgan Corporation plant (Standard Industrial Classification No. 3713). The facility is located in Polk County at 4434 Maine Avenue in Lakeland, Florida. The UTM coordinates are Zone 17, 414.2 km East, and 3098.9 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this

proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;
(b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of when and how the petitioner received notice of the agency decision;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

Robert C. Wong Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Mr. Pete Egberts
Morgan Truck Body, LLC dba Morgan Corporation
pete.egberts@morgancorp.com

Mr. Doug Sanders
Morgan Truck Body, LLC dba Morgan Corporation
doug.sanders@morgancorp.com

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is an existing truck body surface coating facility. It consists of the following emissions units.

Facility ID No. 1050369	
ID No.	Emission Unit Description
001	Two Paint Spray Booths

Exempt Emission Units/Activities

- One 3.92 MMBtu/hour natural gas fired heater, exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for VOC (volatile organic compounds) and total HAPs (hazardous air pollutants).

{Federal NESHAP Applicability Note: This facility could be subject to Federal NESHAP 40 CFR 63 Subpart HHHHHH (National Emissions Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources) if it uses coatings containing the target HAPs of chromium (Cr), nickel (Ni), cadmium (Cd), lead (Pb), or manganese (Mn), or uses methylene chloride (MeCl) as a chemical stripper. Should the permittee become subject to this subpart, it shall comply with all its applicable provisions. As of the effective date of this permit, this rule has not been adopted by the State of Florida.}

{Federal NSPS Applicability Note: This facility is not subject to Federal NSPS 40 CFR 60 Subpart MM (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations) since this rule was intended to cover plants that construct the chassis and then add the body, engine and other components. Morgan Truck Body only manufactures truck body; chassis is supplied by the customer.}

PERMIT HISTORY/AFFECTED PERMITS

Replaces permit No. 1050369-003-AO.

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance

with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:
    a. The appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;
    b. The appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and
    c. Copies of the most recent month of records/logs specified in Specific Condition No. A.3.

    [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

FACILITY-WIDE SPECIFIC CONDITIONS

9. Volatile Organic Compounds (VOC) and Organic Solvents (OS) Emissions: In addition to Condition 6. of Appendix C., the permittee shall comply with the following:
    a. Maintain covers, lids, etc., on all containers of VOC/OS when they are not being handled, tapped, etc.
    b. Prevent excessive air turbulence across exposed VOC/OS.
    c. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc., of VOC/OS so that it can be covered when not in use.
    d. All fittings, valve lines, etc., shall be properly maintained.
    e. All VOC/OS spills shall be attended to in a timely manner and the waste properly disposed of, recycled, etc.

    [Construction Permit No. 1050369-002-AC]

B. EU No. 001 – Two Paint Spray Booths

This section of the permit addresses the following emissions unit.

ID No.	Emissions Unit Description
001	This emissions unit consists of a "Drive-Thru" paint spray booth and a "Spray-Into" paint spray booth. Both paint spray booths are used to paint various parts of truck bodies. The "Drive-Thru" paint spray booth consists of a Spray Booth Systems, Inc. Model Number TEMDD181660PDT-H.O.T. Modified Down Draft Paint Spray Booth. It is equipped with an exempt natural gas fired heater with a maximum design heat input rate of 3.92 MMBtu/hour. The "Spray-Into" paint spray booth consists of a Spray Booth Systems, Inc. Model Number IECD12120DF S/N. Both paint spray booths are equipped with polyester media filters to control paint overspray and utilize HVLP (high volume low pressure) guns with a transfer efficiency of 60-65%. Pollutants generated by this emission unit consist primarily of fugitive VOC and HAPs contained in the paints. Products of combustion are also emitted from the natural gas heater.

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation: The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1050369-002-AC]

EMISSIONS STANDARDS

A.2. Emissions Limit: Emissions from this emissions unit shall not exceed the following:

Pollutant	**Emission Limit** (tons per any consecutive 12-month period)
VOC (Volatile Organic Compounds)	40.5
Total HAPs (Hazardous Air Pollutants)	8.5

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1050369-002-AC]

RECORDS AND REPORTS

A.3. Monthly Log: Monthly recordkeeping logs shall be maintained to document compliance with Specific Condition No. A.2. At a minimum, the logs shall include the following for the emissions unit:

a. Facility name, facility ID number (i.e., 1050369), emissions unit number (i.e., 001), month, and year.

b. For each raw material (paint, coatings, adhesives, organic solvents, etc.) used that contains VOC and/or HAP, record or calculate the following:

1) Raw material identification/description.
2) Raw material density.
3) Weight percent or pounds/gallon of VOC in each raw material.
4) Weight percent or pounds/gallon of HAP in each raw material.
5) The total quantity of each raw material used for month (in gallons or pounds).

6) The total quantity of VOC used for the month (in pounds or tons) for each raw material.
7) The total quantity of HAPs used for the month (in pounds or tons) for each raw material.
8) The total quantity of VOC used for the most recent consecutive 12-month period (in tons).
9) The total quantity of HAPs used for the most recent consecutive 12-month period (in tons).

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1050369-002-AC]

A.4. Documentation: Supporting documentation (MSDS sheets, purchase orders, EPA "As Supplied" data sheets, etc.) shall be kept for all chemicals stored at the facility, which includes sufficient information to determine emissions and compliance. Where credit is taken for recycled materials, documentation of reclaimed chemicals, such as during clean-up operations that use solvents, will use a mass balance method to determine usage (amount used for clean-up minus amount collected for disposal or recycle). These records shall be maintained at the facility and be made available to the Department for inspection upon request.
[Rule 62-4.070(3), F.A.C.]

A.5. Records Retention: All monthly records shall be completed by the 15th day of the following month. All records required by this permit shall be maintained at the facility for at least three years, unless otherwise noted, and be made available to the Department for inspection upon request.
[Rule 62-4.160(14)(b), F.A.C.; Construction Permit No. 1050369-002-AC]