Florida Production Engineering, Inc.
Ormond Beach Facility

Facility ID No. 1270102
Volusia County

Title V Air Operation Permit Renewal

Permit No. 1270102-015-AV
(Revision of Title V Air Operation Permit No. 1270102-012-AV
incorporating Construction Permit 1270102-013-AC)

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Permitting Authority:

State of Florida
Department of Environmental Protection
Waste & Air Resource Programs, Central District

3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Telephone: (407) 897-4100
E-mail: **DEP_CD@dep.state.fl.us**

Compliance Authority:

State of Florida
Department of Environmental Protection
Compliance Assurance Program, Central District

3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Telephone: (407) 897-4100
E-mail: **DEP_CD@dep.state.fl.us**

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DRAFT/PROPOSED PERMIT

PERMITTEE:
Florida Production Engineering
2 Tower Circle
Ormond Beach, Florida 32174-8759

Permit No. 1270102-015-AV
Ormond Beach Facility
Facility ID No. 1270102
Title V Air Operation Permit Renewal

The purpose of this permit is to revise the Title V air operation permit No. 1270102-012-AV for the above referenced facility to incorporate conditions of Construction Permit 1020102-013-AC, dated 11/6/2013, which was issued to the facility to authorize modification of existing manufacturing cell 12 to accommodate manufacturing production of new automobile trim products, installation of four new natural-gas fired curing ovens, and conversion of an existing curing oven from electric to natural gas. The existing Ormond Beach Facility is located in Volusia County at 2 Tower Circle, Ormond Beach Florida. UTM Coordinates are: Zone 17, 488.30 km East and 3240.30 km North. Latitude is: 29˚ 17' 36" North; and, Longitude is: 81˚ 07' 14" West.

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: TBD
Renewal Application Due Date: August 12, 2017
Expiration Date: March 25, 2018

(Draft/Proposed)

_____

F. Thomas Lubozynski, P.E. Date
Waste & Air Resource Programs Administrator

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Subsection A. Facility Description.

This facility consists of wheel cover manufacturing operations and airbag cover manufacturing operations. The wheel cover operations include manufacturing cells no. 1, 2, 3, 4, 5, 12, and Deco Manufacturing Cell. Each wheel cover manufacturing cell includes paint spraying and paint drying. Each paint spray booth is equipped with paint filters to control particulate emissions. The air bag cover manufacturing operations include manufacturing cells A, B, C, D, and E. Each air bag manufacturing cell contains two promoter spray booths, two topcoat spray booths, and one gas-fired curing oven.

Recently completed construction, which was authorized in Construction Permit 1270102-013-AC and is incorporated in this Permit revision, included facility modifications to manufacturing cell 12 to accommodate manufacturing production of new automobile trim products. The modifications are described further in Section A.

Also included in this permit are miscellaneous unregulated/insignificant emission units and/or activities.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
016	Manufacturing Cells A, B, C, D, E; and No. 1, 2, 3, 4, 5, 12; and Deco Manufacturing Cell.

Subsection C. Applicable Regulations.

Based on the Title V air operation permit revision application received October 2, 2014, this facility is not a major source of hazardous air pollutants (HAP).

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
State Rule Citations (62-4, 62-210.200, 62-213, 62-252, 62-296.320, and 62-297.310	EU 016

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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. To comply, procedures to minimize pollutant emissions shall include the following:

a. tightly cover or close all VOC containers when they are not in use,
b. tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
c. maintain all piping, valves, fittings, etc. in good operating condition,
d. prevent excessive air turbulence across exposed VOC's,
e. immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1), F.A.C.]

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)1. and 4., 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. Minimize particulate matter to the extent practical from roads and other paved area under the control of Florida Production Engineering and from buildings or work areas to prevent particulates from becoming airborne,
b. landscaping or planting of vegetation,
c. use of hoods, fans filters and similar equipment to contain, capture and/or vent particulate matter,
d. confining abrasive blasting and sanding where possible

[Rule 62-296.320(4)(c)1. and 2., F.A.C.; and, proposed by applicant in Title V air operation permit application received October 2, 2014 (reference to application received September 5, 2013)]

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Annual Facility-wide Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. 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, 40 CFR 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 March 1st each year.****}*

FW7. 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. and Condition RR7 in Appendix RR]

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.
    i. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162,

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Fairfax, VA 22038, Telephone: (703) 227-7650, or by e-mail RMPRC@epacdx.net.

ii. According to the following hyperlink, the RMP can be submitted electronically: http://www.epa.gov/emergencies/content/rmp/index.htm#submitting

[40 CFR 68]

FW9. Title V Air Operation Permit Renewal. At least **225 days prio**r to the expiration date of this operation permit (that is August 12, 2017), the permittee shall submit to the Central District office, an appropriate air permit application, DEP Form No. 62-210.900(1). The Department recommends scheduling a pre-application meeting prior to the drafting and submittal of the renewal application. [Rule 62-213.420(a)2, F.A.C

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Subsection A. Emissions Unit 016

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

EU No.	Brief Description
-016	Manufacturing Cells A, B, C, D, E; and No. 1, 2, 3, 4, 5, 12; and Deco Manufacturing Cell. The facility consists of airbag cover manufacturing operations and wheel cover manufacturing operations. • The air bag cover manufacturing operations include manufacturing cells A, B, C, D, and E. Each air bag manufacturing cell contains two promoter spray booths, two topcoat spray booths, and one gas-fired curing oven. • The wheel cover operations include manufacturing cells no. 1, 2, 3, 4, 5, 12, and Deco Manufacturing Cell. Each wheel cover manufacturing cell includes paint spraying and paint drying. Each paint spray booth is equipped with paint filters to control particulate emissions. Each spray booth uses high volume, low pressure (HVLP) spray guns with robotic arms Manufacturing cell 12 was modified as authorized in Construction Permit 1270102-013-AC to accommodate production of new automobile trim products. The modifications included: • the addition of new production equipment which uses additional inks and clear coat applications; and • the installation of four, natural-gas fired curing ovens, each with a maximum heat input rate of 0.5 Million British Thermal Units per hour (MMBTU/hr). In addition, the facility modified an existing electric curing oven in Cell 12 to natural gas fired, with a maximum heat input rate of 0.143 MMBTU/hr. The four new ovens and the one modified oven exhaust from the facility through one common stack.

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The total oven maximum allowable heat input rates for natural gas or propane use is 74,049 MMBTU per any consecutive 12-month period.
[Rules 62-4.160(2), 62-204.800, 62-210.200(247), "Potential to Emit," F.A.C., and Construction Permit 1270102-008-AC]

A.2. Methods of Operation. Each oven shall be fired by natural gas or propane only. Manufacturing Cell "D" is permitted to operate a natural gas fired, propane gas fired, or infrared (IR) curing oven.
[Rule 62-213.410, F.A.C. and Construction Permit 1270102-008-AC]

A.3. Hours of Operation. The hours of operation are not limited (8,760 hours/year). [Rule 62-210. 200(247), "Potential to Emit," F.A.C.]

A.4. Methods of Operation. No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly, [Rule 62-210.650, F.A.C.]

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Emission Limitations and Standards

A.5. Visible Emissions. Visible emissions shall not exceed 20% opacity. [Rule 62-296.320(4)(b)1, F.A.C.]

A.6. VOC and HAP Emissions. The maximum facility total VOC, total HAPs, and individual HAP emissions from this facility shall not exceed the following limits:

Pollutant	**Maximum Emissions Rate** (Tons Per Any Consecutive 12-month period)
VOC Emissions (including any clean-up solvents)	Less than 249
Total HAP Emissions	Less than 25
Individual HAP Emissions	Less than 10

[Rule 62-210.200, (PTE), F.A.C., Construction Permit 1270102-008-AC, and permit application received October 2, 2014.]

Recordkeeping Requirements

A.7. Monthly Log: In order to demonstrate compliance with specific condition numbers **A.1.** and **A.6.**, the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded.

The monthly summary of the log, at a minimum, shall contain the following:

a) Facility Name, Facility ID No. (i.e., Florida Production Engineering, Inc., Facility # 1270102);

b) Designation of the month and year of operation for which the records are being tabulated;

c) Monthly total of total VOC emissions and each individual HAP emission as calculated using the mass balance method described in Appendix C, Item 11.b.(3). The log must include the calculations and supporting documents relied upon to determine the total emitted.

d) Consecutive 12-month total of VOC emissions; and,

e) Consecutive 12-month total of total HAP emissions and each individual HAP emission.

The monthly logs shall be completed no later than the end of the following month.

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data is available until such a time as a consecutive 12-month total can be maintained each month.

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Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated product which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle).

The log and documents shall be kept at the facility for at least five years and made available to the Department. The monthly logs shall be completed by the end of the following month.

[Rule 62-4.070(3), F.A.C.]

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SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TV, Title V General Conditions.

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