TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Florida Production Engineering
2 Tower Circle
Ormond Beach, Florida

Ormond Beach facility

Facility ID No. 1270102

PROJECT

Project No. 1270102-015-AV
Application for Title V Air Operation Permit Revision
Project Name: Title V Air Operation Permit Revision

COUNTY

Volusia County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

October 7, 2014

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Prepared by Stephen Amirault, Project Engineer.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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. Project Description:

A. Applicant:

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B. Professional Engineer:

Phillip D Cobb, P. E.
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C. Project Location:

2 Tower Circle
Ormond Beach Florida, 32174

D. Project Summary:

The purpose of this application is to revise the current Title V Air Operation Permit (Permit No. 1270102-012-AV) in order to incorporate Air Construction Permit No. 1270102-013-AC. Permit No. 1270102-013-AC authorized the modification of existing Manufacturing Cell 12 to allow for production of additional automotive trim products, installation of four new natural-gas fired curing ovens, and conversion of an existing curing oven from electric to natural gas. Changes include reformatting to reflect the new Title V permit template facility-wide conditions and revising the description of EU 016 to include the completed modifications to Manufacturing Cell 12 .

E. Application Information:

Application Received: October 2, 2014
Application Complete: October 10, 2014

II. PSD Applicability for Project

As provided in the application total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

III. Rule Applicability

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. – Stationary Source General Requirements	Y	Not exempt from 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	Painting operations could be a source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting	Y	Painting operations are a source of VOC and odors.

Subject to:	**Y/N**	**Comments**
Standards (VOCs and Odor)		
Rule 62-296.400, 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	Volusia County is an attainment area for ozone.
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– 40 CFR 60)	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. The NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH) was determined as not applicable to the facility operations during the Title V permit renewal 1270102-012-AV.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	Facility is a Title V source for volatile organic compounds (VOCs)

IV. Summary of Emissions

Pollutant	EU No. and brief description	Actual Emissions (tons per year)	Allowable Emissions (tons per year)
VOC	016 – Manufacturing Cells	78.7[1]	Less than 249
Total HAP	016 – Manufacturing Cells	6.6[2]	Less than 25
Individual HAP	016 – Manufacturing Cells	2.64 (xylenes)[2]	Less than 10
VE	016 – Manufacturing Cells		Less than 20%

1. *The actual VOC emissions are provided for the 12-consecutive month period from September 1, 2013 to August 31, 2014, as provided in Table 2a of Title V Permit Revision Application, received October 2, 2014.*

2. *The actual HAP and individual HAP emissions are provided for the 12-consecutive month period from September 1, 2013 to August 31, 2014, as provided in Table 2b of Title V Permit Revision Application, received October 2, 2014.*

3. *Modifications which were authorized in construction Permit 1270120-013-AC and incorporated in this Title V Permit revision did not result in any changes to facility-wide emission limits.*

V. Federal NSPS and/or NESHAP Provisions

There are no NSPS or NESHAP Provisions that are applicable to the facility. The NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH) was determined as not applicable to the facility operations during the Title V permit renewal 1270102-012- AV.

VI. 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.

VII. 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 Waste & Air Resource Programs, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

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).