FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Electronically Sent- Received Receipt Requested
eddier@metra-autosound.com

FINAL PERMIT

PERMITTEE

Metra Electronics Corporation
Holly Hill Facility
460 Walker Street
Holly Hill, FL 32117-2699

Authorized Representative:
Mr. Eddie Robertson, Executive Vice President

Air Permit No. 1270208-002-AC
Permit Effective: 11/18/2014
Permit Expires: 11/01/2019
Site Name: Metra Electronics Corporation
Synthetic Minor Source Air Construction Permit
Project Name: Expansion of facility surface coating operations

This is the Final air construction permit, which authorizes an increase in production in two existing spray booths currently located on-site, and installation of two new spray booths to allow for increased production of automobile audio dash kits and other electronic accessories at the facility. The proposed work will be conducted at the Metra Electronics Corporation, Holly Hill facility (Standard Industrial Classification No. 3663). The facility is located in Volusia County at 460 Walker Street in Holly Hill, Florida. The UTM coordinates are Zone 17, 495.3 km East, and 3235.4 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 (Mail Station #35, 3900 Commonwealth Boulevard, 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 30 days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida

_____ November 18, 2014

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

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 November 18, 2014 to the persons listed below.

Mr. Eddie Robertson, Executive Vice President, Metra Electronics Corporation: **eddier@metra-autosound.com**
Mr. Abe Agront, Environmental Health and Safety Director,
Metra Electronics Corporation: **abea@metra-autosound.com**
Mr. Michael Ballenger, P.E., Trinity Consultants: **mballenger@trinityconsultants.com**

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

_____ November 18, 2014
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility consists of two spray booths which are currently permitted under Air General Permit 1270208-001-AG.

Project Description Proposed Emission Units

This project will create the following emissions units.

Facility ID No. 1270208	
ID No.	Emission Unit Description
001	Surface Coating and Molding/Tooling Operations

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Units

The following emission sources at this facility are exempt from air permitting in accordance with the specific Rules cited:

1. Three compression ignition diesel emergency generators (two, 241-horsepower (hp), one, 163-hp) that meet the criteria for a categorical exemption as provided in Rule 62-210.300(3)(a)35., F.A.C., are classified as exempt from air permitting as long as they meet the exemption criteria. The facility must keep records to verify that the equipment meets the exemption criteria. For this facility, the exemption criteria are:
    a. The engine is not subject to any unit-specific limitation or requirement other than those in 40 C.F.R. Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, or 40 C.F.R Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines;
    b. The total annual diesel fuel burned by all engines shall not exceed 64,000 gallons of diesel fuel;
    c. If the engine is subject to 40 C.F.R. Part 60, Subpart IIII, the permittee shall comply with all limitations and requirements of Subpart IIII that apply to the engine. The permittee shall maintain the manufacturer's certification for diesel engines subject to Subpart IIII;
    d. If the engine is subject to 40 C.F.R. Part 63, Subpart ZZZZ, the permittee shall comply with all limitations and requirements of Subpart ZZZZ that apply to the engine.

2. Two existing, and two proposed new natural gas fired external combustion heating units that meet the criteria for a categorical exemption in Rule 62-210.300(3)(a)33., F.A.C., are classified as exempt from air permitting as long as they meet those exemption criteria. The facility must keep records to verify that the equipment meets these exemption criteria. For this facility, these exemption criteria are:
    a. No unit shall be subject to any unit specific applicable requirement;
    b. The rated heat input capacity of each unit must be less than 10 MMBTU/hr, and the total heat input of all units combined must be less than 10 MMBTU/hr;
    c. The unit shall burn only natural gas or propane.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- 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 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, Prevention of Significant Deterioration, F.A.C.
- This facility is a synthetic non-Title V source for HAPs and individual HAPs. The recordkeeping of HAP emissions based on total coating usage at the facility by each individual type as proposed by the applicant will ensure that the actual HAP emissions remain less than the major source threshold limits.

PERMIT HISTORY/AFFECTED PERMITS

This is the initial Air Construction Permit for the facility. The facility is currently permitted under Air General Permit 1270208-001-AG.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Waste & Air Resource Programs. The Central District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Central District Office
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767
   Telephone: 407-897-4100

   All documents related to applications for permits shall be submitted to the above address or electronically to the following address: **DEP_CD@dep.state.fl.us.** In any electronic submittal clearly identify the Air Permit No. 1270208-002-AC

2. Compliance Authority: The compliance authority for this project is the Florida Department of Environmental Protection, Central District Compliance Assurance Program. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Compliance Assurance Program (Use the above mailing or e-mail address).

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 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: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. The AOR shall be submitted electronically to the

Department by April 1st of each year. Go to the following website for the latest information about electronic submittal of AORs: http://www.dep.state.fl.us/air/emission/eaor/default.htm.
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit: This permit authorizes construction or modification of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions units. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of the fourth spray booth in its final configuration as determined by the applicant. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air 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.;

   c. copies of the most recent compliance test reports required by Specific Condition No. **A.9**, if not previously submitted; and,

   d. copies of the most recent two months of records/logs specified in Specific Condition No(s). **A.10**.

[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.]

A. EU No 001- Surface Coating and Molding/Tooling Operations

This section of the permit addresses the following emission unit.

ID No.	Emission Unit Description
001	Surface Coating and Molding/Tooling Operations: Manufacturing at the facility is comprised of the following main operations: Molding, tooling, grinding, and painting. The Mold Room manufactures plastic automobile dash kits and other components through plastic injection molds. The Tool Room supports the molding operation through product development, setup, and maintenance of the molds. The Mold and Tool Rooms use various mold cleaners, solvents, lubricants and other VOC and HAP containing materials which have the potential to produce fugitive air emissions. The parts manufactured from injection molding and other parts received on site will be evaluated for quality. Off-spec parts are sent to the Grinding Room to be grinded down for reuse. Finished plastic molded parts are sent to the Paint Shop for surface coating and packaging. The painting operation can be described as follows: • *Preparation:* Parts received are sorted out between painted and non-painted. Non-painted parts are wiped clean with alcohol, if necessary. • *Paint Coating Preparation:* The specific paint coating for a job is prepared in the Paint Shop Mixing Room. A detailed log is kept to document the specific coatings and amounts of coatings used to prepare the coating mixture for a paint job. • *Spray / Paint Operation:* The specific coating is manually applied to the parts that constitute a paint job with spray guns, inside the paint booths. • *Cure:* After painting, wet parts are put on vertical racks inside one of the paint booths for drying. Some wet parts are then cured at a temperature of 140°F, with heated air supplied by burners in the air make up unit to the paint booth. Natural gas is used as fuel for the curing operations. Additionally, some parts are air dried in or around the paint booth after they have gone through the curing process. • *Packaging:* After the parts have cooled down, they are sent to the packaging area. Emissions from the painting operations are routed through cabin booth filters before the air is exhausted into the atmosphere through a separate stack. This Construction Project will allow the facility to expand their surface coating capabilities of the current existing equipment, and for new construction of additional paint booths. The facility currently consists of two closed cabin paint booths. As part of this project, the facility will increase the utilization of these two existing paint booths by increasing their operational hours, that is, adding one work shift and one work day during the weekends. In addition, the facility plans to add two new down draft paint booths in a new building planned to be constructed at the facility. Depending on the facility's evaluation of its plant production preferences, the two existing closed cabin booths may be relocated to the new building where the new paint booths will be located.

A. EU No 001- Surface Coating and Molding/Tooling Operations

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation: The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210. 200(247), "Potential to Emit," F.A.C.]

EMISSIONS STANDARDS

A.2. VOC and HAP Emissions Standards – As proposed by the Applicant, 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	70
Total HAP Emissions	24.9
Individual HAP Emissions	9.9

[Permit Application received October 6th, 2014, and Rule 62-210.200(247) "Potential to Emit", F.A.C.]

A.3. Visible Emissions. Visible emissions shall not exceed 20% opacity.
[Rule 62-296.320(4)(b)1, F.A.C]

TESTING REQUIREMENTS

A.4. Initial Compliance Tests: Each spray booth shall be tested to demonstrate initial compliance with the emissions standards for visible emissions. The initial tests shall be conducted no later than 90 days after initial operation of the spray booth, either after it is installed (for a new, down draft booth), or after it is relocated (for an existing closed cabin booth).
[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

A.5. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.6. Test Method(s): Required tests shall be performed in accordance with the following reference method.

Method(s)	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.401, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

A.7. Test Notification: The permittee shall notify the Compliance Authority (DEP_CD@dep.state.fl.us) at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the permittee. The notification shall identify the spray booth which is planned to be tested and if it is a new installed booth or a relocated existing booth

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.8. Notification of Operation Commencement: The permittee shall notify the Compliance Authority (DEP_CD@dep.state.fl.us) of the date of commencing operation of each spray booth no later than five (5) business days after that date. The notification shall identify the spray booth for which operation has commenced and if it is a new installed booth or a relocated existing booth. Commencing operation is defined as setting any emissions unit into operation of for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

A.9. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit, that is, the required test report shall be filed with the Department as soon as practical but no later than 45 days after each test is completed.
[Rule 62-297.310(8), F.A.C.]

A.10. Monthly Log: In order to demonstrate compliance with Specific Condition **A.2.,** 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 for EU 001 operations:

A. EU No 001- Surface Coating and Molding/Tooling Operations

1. Facility Name, Facility ID No. (i.e., Metra Electronics Corporation, Facility ID 1270208);
2. Designation of the month and year of operation for which the records are being tabulated;
3. Monthly total of: total VOC emissions; each individual HAP emission; and, total HAPs emissions, in tons/month. The log must include the calculations and references to the supporting documents relied upon to determine the totals emitted.
4. Consecutive 12-month total of VOC emissions; and,
5. Consecutive 12-month total of total HAPS 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.

Supporting documentation (chemical usage tracking logs, Safety Data Sheets (SDS), purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products 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.

The log and documents shall be kept at the facility for at least five years and made available to the Department upon request. The monthly logs shall be completed by the end of the following month.
[Rule 62-4.070(3) and Chapter 62-210, F.A.C.]