

Florida Production Engineering, Inc.
Ormond Beach Facility
Facility ID No. 1270102
Volusia County

Title V Air Operation Permit Renewal

Permit No. 1270102-012-AV
(Renewal of Title V Air Operation Permit No. 1270102-010-AV)



Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
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Compliance Authority:

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Department of Environmental Protection
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DRAFT/PROPOSED PERMIT

PERMITTEE:

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

Permit No. 1270102-012-AV
Ormond Beach Facility
Facility ID No. 1270102
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Ormond Beach Facility 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: TBD
Expiration Date: TBD

(Draft/Proposed)

Caroline D. Shine
Air Program Administrator

CDS/jr/sa

SECTION I. FACILITY INFORMATION.

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.

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

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
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 renewal application received December 14, 2012, 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

SECTION II. FACILITY-WIDE CONDITIONS.

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:

- tightly cover or close all VOC containers when they are not in use,
- tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
- maintain all piping, valves, fittings, etc. in good operating condition,
- prevent excessive air turbulence across exposed VOC's,
- 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:

- 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,
- landscaping or planting of vegetation,
- use of hoods, fans filters and similar equipment to contain, capture and/or vent particulate matter,
- 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 December 14, 2012.]

SECTION II. FACILITY-WIDE CONDITIONS.

Annual Reports and Fees

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

- FW6. Annual Operating Report.** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]
- FW7. Annual Emissions Fee Form and Fee.** The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download 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>. [Rule 62-213.205, F.A.C.]
- FW8. 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.]
- FW9. 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. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
 - b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

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.

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(PTE), F.A.C.]
- 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.]
- A.3. Hours of Operation. The hours of operation are not limited (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.]
- A.4. Methods of Operation. All spray booths in manufacturing cells B, C, D, and E shall use high volume, low pressure (HVLP) spray guns with robotic arms. [Rule 62-4.160(2), F.A.C.]
- A.5. 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.]

Emission Limitations and Standards

- A.6. Visible Emissions. Visible emissions shall not exceed 20% opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
- A.7. VOC and HAP Emissions. The maximum facility total VOC emissions are limited to less than 249.0 tons per any consecutive 12-months, total HAP emissions are limited to less than 25.0 tons per any consecutive 12-months, and each individual HAP emission is limited to less than 10.0 tons per any consecutive 12-months, updated monthly. [Rule 62-210.200, (PTE), F.A.C. and permit application received December 14, 2012.]

Recordkeeping Requirements

- A.8. The permittee shall demonstrate compliance with emission limitations in specific condition A.7. by using one of the following methods:

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit 016

- a. Testing each coating batch using EPA Method 24 as contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C.
- b. Obtaining and maintaining a written manufacturer's certification of the composition of each batch coating, supported by actual batch formulation records. The manufacturer's certification must be consistent with EPA's documentation number 405/3-84-019, "Procedures for Certifying Quantity of Volatile Organic Compound Emitted by Paint, Ink, and other Coatings" or other similar documents approved by the Department.
- c. Obtaining and maintaining current written MSDS for each batch shipment of coating. The MSDS may be kept by paper or electronic filing. [Rule 62-213.440(2), F.A.C.]

Records of the information required in this specific condition shall be maintained in accordance with Specific Condition **A9.** of this permit.

- A.9.** In order to demonstrate compliance with specific condition numbers **A1.** and **A7.**, 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 log, at a minimum, shall contain the following:

Monthly

- a) Designation of the month and year of operation for which records are being tabulated;
- b) Consecutive 12-months total of VOC emissions, total HAP emissions, and each HAP emission;
- c) One month total of VOC emissions, total HAP emissions, and each HAP emission; and
- d) Consecutive 12-months total of oven heat input (in units of MMBTU).

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-months 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.

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

Logs must document the method, calculations, and formulas used in determining the usage rate and the emission rate. This includes, but is not limited to, the product name, density, individual and total HAP contents, and individual and total VOC content. All calculations, including those used to derive emission credits for mass balance, must be clearly documented, and may be presented in the form of a template of sample calculations, which is filed with the logs required in this specific condition and available for review on site. [Rule 62-4.070(3), F.A.C.]

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.