



Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
One North University Drive, Suite: 203, Plantation, Florida 33324
954-519-1260 • FAX 954-519-1495

NOTICE OF PERMIT

Mr. Jim Clayton
V. P. Operations
J. L. Audio, Inc.
10369 N. Commerce Parkway
Miramar, Florida 33025

**VIA ELECTRONIC MAIL
RETURN E-MAIL RECEIPT REQUESTED**

Dear Mr. Clayton:

Enclosed is operation permit number 0112652-002-AF to operate an air pollution source issued pursuant to Section 403.087 of the Florida Statutes, Broward County’s Specific Operating Agreement with the Florida Department of Environmental Protection, and Broward County Code Chapter 27 Article IV which adopts Florida Administrative Code (FAC) 62-4, 62-204, 62-210, 62-296 and 62-297.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 62-103 and 28-5.201, FAC, and must be filed (received) in the Pollution Prevention, Remediation and Air Quality Division (PPRAQ), One North University Drive, Suite: 203, Plantation, Florida 33324 within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes and Chapter 27.

This permit is final and effective on the date filed with the Clerk of the PPRAQ unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, FAC. Upon timely filing of a petition or a request for an extension of time, this permit will not be effective until further Order of the PPRAQ. When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Pollution Prevention, Remediation and Air Quality Division, One North University Drive, Suite: 203, Plantation, Florida 33324; 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 of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the PPRAQ.

Executed in Broward County, Florida
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION

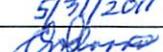


Daniela Banu, Air Quality Administrator

cc: Lennon Anderson, DEP Southeast District Office (VIA EMAIL)
Kevin Dubart, Langan Engineering & Environmental Services (VIA EMAIL)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

5/31/2011


Clerk

5/31/2011

Date



Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
One North University Drive, Suite 203, Plantation, Florida 33324
954-519-1260 • FAX 954-519-1495

NOTICE OF AIR POLLUTION PERMIT

ISSUED TO:

PERMITTEE:

J. L. Audio
Authorized Representative:
Mr. Jim Clayton, V. P. Operations
10369 North Commerce Parkway
Miramar, Fl 33025-3921

AIRS ID NO: 0112652
Permit Number: 0112652-002-AF
Issue Date: May 31, 2011
Expiration Date: May 3, 2016

Facility Name: J. L. Audio

Project Description: Air operation permit for a facility engaged in the manufacture of audio speakers and wooden speaker enclosures for automobiles and other uses. There are no changes from the initial permit and public notice is not required at this time. SIC Code: 3651.

Lat/Long: 26°58'36" N / 80°10'04"

UTM: Zone 17; 579.01 Km. E; 2878.2 Km. N

Statement of Basis: This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) Florida Administrative Code (F.A.C.) Rules 62-4 and 62-210 through 62-297 (permitting requirements) and Broward County Code, Chapter 27 (emission limitations) and in conformance with all existing regulations of the Florida Department of Environmental Protection (FDEP). The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Broward County Pollution Prevention, Remediation and Air Quality Division (PPRAQD) and made a part hereof.

In accordance with: Application to obtain an air permit, for an existing operation, received June 23, 2005, additional information received January 10, 2006, additional information received April 26, 2006, Notice of Intent to Issue Permit issued June 9, 2006 and published in the Sun-Sentinel newspaper and Proof of Publication received September 1, 2006, renewal application and fee received April 1, 2011, additional information received May 19, 2011 (none are attached.)

This permit is organized by the following sections.

1. Facility Description
2. General Conditions
3. Facility-wide Conditions
4. Emissions Unit Specific Conditions

Executed in Broward County, Florida

Daniela Banu
Air Quality Administrator
Broward County Pollution Prevention, Remediation and Air Quality Division

1. FACILITY DESCRIPTION

This facility manufactures speaker audio equipment and entertainment systems for automobiles. They also manufacture wooden speaker enclosures. There is a fiberglass application and resin lay out. The emissions unit consists of four paint spray booths for the fiberglass, gel coat application and layout. They exhaust to the atmosphere having one exhaust stack per spray booth. Also, there are two grinding booths which do not exhaust to the atmosphere, therefore are not considered air pollution sources.

This operation consists of reinforced plastics molding to fabricate speakers for automobile audio systems using about 80% closed molding operation. The open molding operation accounts for 20% only. Fifty percent (50%) of the high performance speakers are manufactured at the facility and the other 50% is manufactured in Kentucky and China. The contact cement (glue) and the fiberglass are sprayed in the spray booths and the resin and adhesives are manually applied using a dispensing tube. The polyester resin is black type 80% solids paint with satin finish applied to the wooden speaker enclosures.

The open molding operation consist of manual resin application, non-vapor suppressed resin used in atomized, non-atomized mechanical resin application, atomized resin application with robotic or automated spray control and filament application. Also, non-atomized spray gel coat application, non-vapor suppressed gel coat is used with non-CR/Hs in the resin/filament application. Tooling and white/off-white pigmented is used in gel coat application. The closed molding operation consists of resin transfer molding only. The facility operates one ten hour shift per day, four days per week.

They used a variety of products, some non-VOC and non-HAP. Primer is also used with a brush, glue with a dispensing tube. The gel coat and accelerator are sprayed in the spray booths. The resin is applied manually. The contact cement is glue and it is applied partially with a brush and sprayed in the carpet that covers the speakers.

The facility consists of the following emissions units:

E.U. ID No.	Brief Description
001	A reinforced plastic molding fiberglass application and resin lay out operation with 80% closed molding and 20% open molding. There are four spray booths which exhaust to the atmosphere. There is one exhaust stack per spray booth. In addition, there are two grinding booths which do not exhaust to the atmosphere that are considered exempt emissions units.

Permitting Note: This permit contains federally enforceable limitations to keep the facility below the major source (Title V) and 40 CFR 63, Subpart WWWW – National Emissions Standards of Hazardous Air Pollutants (NESHAP) Reinforced Plastic Composites Production. Also, the facility applied to obtain a construction permit on June 23, 2005, but a FESOP was issued instead; to conform with the federally enforceability requirements of an existing operation.

2. GENERAL CONDITIONS

1. Terms of Permit. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The Permittee is placed on notice that the PPRAQD will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rule 62-4.160 (1), F.A.C.]

-
2. **Permit Validity.** This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the PPRAQD.
[Rule 62-4.160 (2), F.A.C.]
 3. **Disclaimer.** As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, or any violations of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other permit that may be required for other aspects of the total project which are not addressed in this permit.
[Rule 62-4.160 (3), F.A.C.]
 4. **Disclaimer.** This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interest have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rule 62-4.160 (4), F.A.C.]
 5. **Liability.** This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and FDEP rule, unless specifically authorized by an order from the PPRAQD.
[Rule 62-4.160 (5), F.A.C.]
 6. **Operation and Maintenance.** The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by county and state rules. This provision included the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by PPRAQD and FDEP rules.
[Rule 62-4.160 (6), F.A.C.]
 7. **Onsite Inspection Activities.** The Permittee, by accepting this permit, specifically agrees to allow authorized PPRAQD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times (depending on the nature of the concern being investigated), access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or PPRAQD and FDEP rules.[Rule 62-4.160 (7), F.A.C.]
 8. **Notice of Noncompliance.** If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide PPRAQD with the following information:
 - (a) A description of and cause of noncompliance; and
 - (b) The period of noncompliance, including dates and times, or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any enforcement action by PPRAQD for penalties or for revocation of this permit.[Rule 62-4.160 (8), F.A.C.]

-
9. **Reporting Noncompliance.** The Permittee shall report any periods of noncompliance to the PPRAQD immediately by phone at 954-519-1499 or by Email at EPDHOTLINE@broward.org. This also applies when the period of non-compliance is first determined after normal business hours or on weekends and holidays.
[Rules 62-4.130 and 62-4.070(3), F.A.C.]
10. **Evidence Materials.** By accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted facility or activity, that are submitted to the PPRAQD, may be used by the PPRAQD as evidence in any enforcement proceeding arising under the Florida Statutes or F.A.C. rules, except where such use is prohibited by Section 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
[Rule 62-4.160 (9), F.A.C.]
11. **Rule Changes.** The Permittee agrees to comply with changes in Florida Department of Environmental Protection rules and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or FDEP rules.
[Rule 62-4.160 (10), F.A.C.]
12. **Permit Transfer.** This permit is transferable only upon PPRAQD approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer approved by the PPRAQD.
[Rule 62-4.160 (11), F.A.C.]
13. **Work Site Copy.** This permit or a copy thereof shall be kept at the work site of the permitted activity.
[Rule 62-4.160 (12), F.A.C.]
14. **Miscellaneous Compliance Requirements.** The Permittee shall comply with the following:
- (a) Upon request, the Permittee shall furnish all records and plans required under FDEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the PPRAQD.
 - (b) The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recording for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by PPRAQD rule.
 - (c) Records of monitoring information shall include:
 1. The date, exact place, and time of sampling or measurements;
 2. The person responsible for performing the sampling or measurements;
 3. The dates analyses were performed.
 4. The person responsible for performing the analyses;
 5. The analytical techniques or methods used;
 6. The results of such analyses.
- [Rule 62-4.160 (14), F.A.C.]
15. **Information Submittal.** When requested by the PPRAQD, the Permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the PPRAQD, such facts or information shall be corrected promptly.
[Rule 62-4.160 (15), F.A.C.]

16. Rules Adoption. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, as amended, are adopted by Broward County Code, Sec. 27-173.
[Broward County Code, Sec. 27-173]

3. FACILITY-WIDE CONDITIONS

17. Objectionable Odor. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
18. Volatile Organic Compound Emissions or Organic Solvent Emissions. No person shall 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 PPRAQD.
[Rule 62-296.320(1), F.A.C., Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(f)]
19. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere any air pollutants from sources, the opacity of which is equal to or greater than 20 percent. If the presence of uncombined water is the only reason for failure to meet visible emission standards given in this section, such failure shall not be a violation of this prohibition.
[Rule 62-296.320(4) (b), F.A.C. and Broward County Code, Section 27-175(i). DEP Guidance, March 2000, DARM-PER 33]
20. Minimizing VOC Emissions. The facility shall implement measures to minimize VOC emissions. Measures shall include, but are not limited to:
- (a) Tightly covering or closing all containers, all open troughs, basins, baths, tanks, etc. that store or handle VOC, when not in use.
 - (b) Immediately confining and cleaning up VOC spills and making sure discarded hazardous material is placed in closed containers for reuse, recycling or proper disposal.
 - (c) Ensuring that the filter media is securely fastened to the frames of the spray booth at all times of operation leaving no gaps around the perimeter or holes in the filter media, and verifying that the blower is in operation at all times of spraying.
[Rule 62-4.070(3) F.A.C.]
21. Unconfined Emissions of Particulate Matter. No person shall cause, let, permit, suffer, or allow the emissions of particulate matter, from any source whatsoever, without taking reasonable precautions to prevent such emission. Reasonable precautions include, but are not limited, to the use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter, and the confinement of abrasive blasting where possible.
[Rule 62-296.320(4) (c), F.A.C.]
22. Concealment. No person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which would otherwise constitute a violation of any provisions of Broward County Codes.
[Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(b)]
23. Circumvention. No person shall circumvent any air pollution device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650 F.A.C and Broward County Code, Sec. 27-175(c)]

- 24. Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Codes.
- 25. Special Compliance Tests. When PPRAQD, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a PPRAQD rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the PPRAQD.
[Rule 62-297.310(7) (b), F.A.C.]
- 26. Annual Operation Report (AOR). The AOR shall be submitted to the PPRAQD by April 1 of the following year. If the permittee elects to use FDEP's electronic annual operation report software (EAOR), the report must be submitted directly to FDEP and there is no requirement to submit a copy to PPRAQD.
[Rule 62-210.370(3), F.A.C.]
{Permitting Note. Information on the EAOR submittal is available at <http://www.dep.state.fl.us/air/eproducts/eaor/default.htm>}
- 27. Operating Permit Renewal. Sixty days before the expiration date of this operation permit, the permittee shall apply for a renewal of permit using the forms incorporated by reference in the specific rule chapter for this type of permit.
[Rule 62-4.090 F.A.C.]
{Permitting Note: The permittee may also elect to submit the application electronically using the Electronic Permit Submittal and Processing system (EPSAP) via the <http://www.dep.state.fl.us/air/software.htm> website, along with the processing fee established in Rule 62-4.050(4), F.A.C. , [62-4.090(1) and 62-4.050(4), F.A.C.]

4. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Description of Emissions Unit
001	A reinforced plastic molding fiberglass application and resin lay out operation with 80% closed molding and 20% open molding. There are four spray booths which exhaust to the atmosphere. There is one exhaust stack per spray booth. In addition, there are two grinding booths which do not exhaust to the atmosphere that are considered exempt emissions units.

Emission Limiting Standards

- 28. In order to avoid major source (Title V) applicable requirements, the volatile organic compound (VOC) emissions shall be less than 100 tons in any consecutive twelve- month period, the individual hazardous air pollutant (HAP) emissions shall be less than 5 tons in any consecutive twelve-month period and the total HAP emissions shall be less than 25 tons in any consecutive twelve-month period.
[Rule 62-4.070(3) F.A.C., F.A.C. Rule 213.420(3) (c) 1, requested by the applicant on the air permit application and additional information received April 26, 2006]

Notifications, Recordkeeping and Reporting Requirements

- 29. Material Usage Records. The permittee shall maintain monthly records of the usage rates of materials generating VOC and HAP (e.g. Polyester Resin, Gel coat, Styrene, solvents). Records shall include the

MSDS of each chemical along with the monthly emissions calculations. These records shall be retained for a period of five years.

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

30. Emission Calculation Records. The permittee shall calculate and maintain records of VOC emissions, individual HAP emissions and total HAP emissions on a consecutive twelve-month rolling period. These records shall be retained for a period of five years.

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

31. The permittee shall notify PPRAQD in writing of any change in products, and shall submit new material safety data sheets (MSDS) prior to use.

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