Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

Eaton Aerospace, LLC
2250 Whitfield Avenue
Sarasota, FL 34243-9703

Authorized Representative:
Mr. Bob Hermann, Plant Manager

Air Permit No. 0810030-012-AF
Permit Expires: 03/14/2017
Site Name: Eaton Aerospace, LLC
Federally Enforceable State Operating Permit (FESOP)
Project Name: Operation Permit Renewal

This is the final air operation permit which renews the FESOP No. 0810030-011-AF for the operation of an existing electronic component manufacturing facility. The operation is conducted at the Eaton Aerospace, LLC (Standard Industrial Classification No. 3625). The facility is located in Manatee County at 2250 Whitfield Avenue, Sarasota, Florida. The UTM coordinates are Zone 17, 348.18 km East, and 3033.52 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to 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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this

proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;
(b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of when and how the petitioner received notice of the agency decision;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

Robert C. Wong Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, 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 _____ to the persons listed below.

Mr. Bob Hermann, Eaton Aerospace, LLC (RobertHermann@Eaton.com)
Mr. Jose D. Calderon, Eaton Aerospace, LLC (JoseDannyCalderon@Eaton.com)
Mr. Robert A. Baker, P.E., Baker Environmental Engineering, Inc. (baker@atlantic.net)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility manufactures electronic components. The manufactured components are assembled into units (relays and switches) that are used in the aerospace and general industrial manufacturing industries.

The existing facility consists of the following emissions unit.

Facility ID No. 0810030	
ID No.	Emission Unit Description
006	Production Operation

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

Exempt Emissions Units/Activities

Based on capacity information and calculated potential emissions submitted with the application dated 3/22/1996, the emissions from the following emission sources at this facility are deemed insignificant and exempt from permitting:

- An emergency generator, Generac Model No. 34237000200, that is fired with LP gas (propane)
  [Rule 62-210.300(3)(a)35., F.A.C.]
- A soldering table that uses LP gas (propane).
  [Rule 62-210.300(3)(a)13., F.A.C.]
- A groundwater remediation system that consists of two (2) wells, one (1) air stripper, and three (3) cooling towers.
  [Rule 62-4.040(1)(b), F.A.C.]

Exemptions under Rule 62-4.040(1)(b), F.A.C., may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

{Permitting Notes:

- *The pollutants that have been able to be measured and stripped out of the contaminated groundwater are trichloroethylene (TCE), which is a HAP and a VOC; and 1,2-Dichloroethylene, which is a VOC. The emissions of these two pollutants will be used in the required recordkeeping described in the specific conditions below.*
- *See construction permit 0810030-002-AC for more detail on some of these emission sources and their exemption.*
- *The electroplating operation is shut down and the emissions related to it and its wastewater treatment system ceased operation permanently. The natural gas boiler is also shut down permanently.*
- *The groundwater remediation system is currently shut down as of the effective date of this permit, but could be restarted in future.}*

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- 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 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compound (VOC) and hazardous air pollutants (HAPs).

PERMIT HISTORY/AFFECTED PERMITS

This operation permit renewal replaces Operation Permit No. 0810030-011-AF.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

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 and operation 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. Records Retention: The records required by this permit shall be completed by the end of the following month. The logs shall be retained on file at this facility for at least three years, and be made available to the Department upon request. [Rule 62-4.070(3), F.A.C.; Construction Permit 0810030-002-AC]

8. Fugitive Dust Emissions: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320(4)(c), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include the following:

    a. Paving and maintaining roads, parking areas, and yards;
    b. Limiting vehicular speed to 10 mph on unpaved roads;
    c. No unnecessary demolition or wrecking. If this type of activity is necessary, apply water to control emissions;
    d. Apply water to unpaved roads, yards, or open stock piles;
    e. Use of hoods, fans, and filters to contain and capture particulate matter inside the production building;
    f. Confining abrasive blasting where possible;
    g. Landscaping;
    h. Use of filters on paint spray booths; and
    i. Use of a boot on the material drop point between the sludge dryer and the dry sludge drum.

    [Rule 62-296.320(4)(c), F.A.C.; Construction Permit No. 0810030-002-AC]

9. VOC Vapor Emission Control Practice: All solvents from solvent washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.
    [Rule 62-296.320(1), F.A.C.]

10. VOC/HAP Emissions Limitations: The emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) shall not exceed the following

Emission Limitation
(Tons per any 12 consecutive-month period)

Emission Source	VOC	Total HAPs	Single HAP
Total Facility *	49.99	24.0	9.0

* includes Production Operation (E.U. 006) and exempt groundwater remediation system.
[Rule 62-4.070 (3), F.A.C.; Construction Permit No. 0810030-002-AC]

11. VOC/HAP Limit Optional Compliance Provisions: Compliance with the above facility-wide limitations will be assumed, based on maximum VOC and HAP Potential-to-emit from the exempt groundwater remediation system provided that the permittee demonstrates (through recordkeeping) that Emission Unit No. 006 Production Operation's emission limits are met. The Production Operation's VOC and/or HAP emission limits can be increased provided the permittee determines actual VOC and/or HAP emission rates from the groundwater remediation system and uses that actual value to determine maximum allowable emissions for the Production

Operation for a specific pollutant for a given 12-consecutive month period. The maximum allowable emission rate for the Production Operation would be the Total Facility emission limit for that pollutant minus the total of the actual emission rate for the exempt groundwater remediation system.
[Rule 62-4.070 (3), F.A.C.; Construction Permit No. 0810030-002-AC]
{Compliance Note: See Specific Condition No. 12 for recordkeeping requirements associated with using the above option.}

12. VOC/HAP Limit Optional Provisions Records: In order to use the actual emissions option described in Specific Condition No. 11 above, the permittee must keep all records necessary to document and calculate actual emission rates for the groundwater remediation system.
The records shall include at a minimum, monthly records of the amount of recovered groundwater that is treated in the groundwater remediation system and records of the results of semi-annual analyses of the groundwater for Trichloroethylene (a HAP) and any other HAPs. The above records shall also include a description of the methodology used to calculate actual emissions.
[Rule 62-4.070(3), F.A.C.; FESOP No. 0810030-009-AF]
{Permitting Note: The groundwater remediation system is currently shut down. If the option is utilized, the recordkeeping shall begin upon re-starting of the remediation system.}

13. Process Changes: If the permittee's semi-annual testing results of the contaminated groundwater's characteristics show they have changed from the calculated potential emissions submitted with the application dated March 22, 1996 for Construction Permit No. 0810030-002-AC, such that the potential emissions will increase, the permittee shall notify the Air Permitting Section of the Southwest District's Air Resource Management Section within 15 days of such discovery for proper processing.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0810030-002-AC]
{Permitting Note: The groundwater remediation system is currently shut down. The semi-annual testing shall begin upon re-starting of the remediation system.}

14. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

15. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an 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 two months of the required VOC, HAP and production records specified in Specific Condition Nos. 12. and A.5.

    [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. 006 – Production Operation

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
006	Production Operation: The electronic component production operation utilizes processes such as brazing, baking, powder mixing, solvent cleaning, sawing, grinding, sanding, soldering, welding, molding, machining, fluxing, painting, etc. during the manufacturing of components to produce a maximum of five (5) million different units (relays and switches) per any consecutive 12-month period. Air emissions from these processes consist of particulate matter (PM), volatile organic compounds (VOC), and hazardous air pollutants (HAPs). The two (2) paint spray booths are equipped with a common fiber filter to control unconfined particulate emissions from overspray.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum production rate for this emission unit is five (5) million units (relays and switches) per any consecutive 12-month period.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 0810030-002-AC]

A.2. Restricted Operation: The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit No. 0810030-007-AC]

EMISSIONS STANDARDS

A.3. VOC/HAP Emissions Limitations: The emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) shall not exceed the following

Emission Limitation
(Tons per any 12 consecutive-month period)

Emission Source	VOC	Total HAPs	Single HAP
Production Operation (E.U. 006) *	46.5	19.96	9.0

* Production Operation emission limits can be increased – see Specific Condition Nos. 10 and 11 in Facility-Wide Section.
[Rule 62-4.070 (3), F.A.C.; Construction Permit No. 0810030-002-AC]

RECORDKEEPING REQUIREMENTS

A.5. Production and VOC/HAP Emission Records**:** In order to document compliance with the limitations of Specific Condition Nos. A.1. and A.3., the permittee shall maintain a monthly log, derived in part from the facility's inventory transactions accounting system. The logs shall at a minimum, contain the following:

a. Permit No. and Emission Unit ID No.
b. Month and Year.
c. The monthly total of the units (relays and switches) produced for that month, along with a cumulative consecutive 12-month total of units produced.
d. Item No. for each product (chemical) used.
e. Product Description for each product used.
f. Quantity of each product used that month.
g. Each VOC and HAP (as defined in Rule 62-210.200, F.A.C.) component of each product used along with its specific C.A.S. number.
h. Each VOC/HAP component's percentage (by weight) in that product used.
i. The emission factor for each VOC/HAP component in each product used.
j. A cumulative consecutive 12-month period total in tons of total VOC emitted from the emission unit.
k. A cumulative consecutive 12-month period total in tons of each individual HAP and total HAPs emitted from the emission unit.

Supporting documentation (MSDS sheets, purchase orders, EPA "As Supplied" data sheets, etc.) shall be kept for each chemical and/or product, which includes sufficient information to determine emissions and compliance. Documentation of reclaimed chemicals, such as during clean-up operations which use solvents will use a mass balance method to determine usage (amount used for clean-up minus amount collected for disposal or recycle). These records shall be made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0810030-002-AC]