Jabil Circuit, Inc.
(Three Circuit-Board Manufacturing Facilities in St. Petersburg)
Facility ID No.: 1030278
Pinellas County

Title V Air Operation Permit Renewal
FINAL Permit Project No.: 1030278-010-AV

Permitting Authority:
Florida Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637
Telephone: 813/632-7600
Fax: 813/632-7668

Compliance Authority:
Pinellas County Department of Environmental Management
Air Quality Division
300 South Garden Avenue
Clearwater, FL 33756
Telephone: 727/464-4422
Fax: 727/464-4420

Title V Air Operation Permit Renewal
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Permittee: **FINAL**
Jabil Circuit, Inc.
10500 Dr. Martin Luther King Jr. Street North
St. Petersburg, FL 33716

Permit No.: 1030278-010-AV
Facility ID No.: 1030278
SIC No(s).: 36
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew Title V Air Operation Permit 1030278-009-AV, and incorporate Construction Permit No. 1030278-011-AC, issued on November 12, 2008. This permit allows for the operation of three separated facilities; Roosevelt, MLK, and Gandy. The existing facilities are located at 10800 Roosevelt Boulevard, 10500 Dr. Martin Luther King Jr. Street North, and 2003 & 2007 Gandy Boulevard, respectively, St. Petersburg, Pinellas County; UTM Coordinates: Zone 17-338.34 km East and 3083.63 km North, Zone 17-338.34 km East and 3083.63 km North, and Zone 17-336.41 km East and 3081.90 km North, respectively; or 27° 52' 11.2" N, 82° 38' 54.6" W, 27° 52' 03.7" N, 82° 38' 54.3" W, and 27° 51' 23.3" N, 82° 39' 41.6" W, respectively.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix TV-6, Title V Conditions version dated 06/23/06

Effective Date: January 26, 2009
Renewal Application Due Date: June 15, 2013
Expiration Date: January 26, 2014

_____
Mara Grace Nasca
District Air Program Administrator
Southwest District

MGN/NEK

Section I. Facility Information.

Subsection A. Facility Description.

The Roosevelt, MLK, and Gandy facilities are considered a single Title V source since they are considered to be adjacent, have the same SIC code, are under common control, and have combined, allowable VOC emissions of more than 100 tons per year. The three facilities are combined for purposes of this permit.

Each facility produces printed circuit boards. The circuit board manufacturing lines are configured to produce printed circuit boards that meet specific customer requirements. In general, a circuit board manufacturing line consists of screen printers that apply printed circuits to substrate boards using solder paste; infrared reflow ovens that dry the solder paste; assembly operations where electronic components are placed on substrate board manually or by automated machinery; conveyorized wave solder machines that use solvent-based flux and a solder wave (molten bar solder) to solder the electronic components to the printed circuit board; and coating operations where coatings or sealants are applied to the finished board or individual components on the board.

The wave solder machines use a thinner (isopropanol) and a flux (isopropanol-based). Isopropanol is a volatile organic compound (VOC) that is vented, without control, during the process. VOC emissions are vented from the wave solder machines via ductwork through roof-mounted exhaust fans. Boards exiting the machines are air-dried and fed directly into water-based washers. Bench-top stations are used for minor hand assembly and soldering, resulting in fugitive VOC emissions. Stencils used for placement of solder paste on bare circuit boards are cleaned in an automatic washing machine with de-ionized water and a VOC-containing solvent. The machines vent to the upblast roof exhausters.

<u>EU 001 – Roosevelt Facility</u>: This facility operates up to 10 conveyorized wave solder machines. Emissions are vented to a common air collection header which is exhausted to the atmosphere via two upblast roof exhausters (25 feet high).

<u>EU 003 – MLK Facility</u>: This facility operates up to 10 conveyorized wave solder machines. Emissions are vented to a common air collection header which is exhausted to the atmosphere via two upblast roof exhausters (25 feet high).

<u>EU 004 – Gandy Facility</u>: This facility operates up to 16 conveyorized wave solder machines, circuit board coating processes (including two bench-top spray booths) and a hand-held spray painting station (two Nordson machines with spray gun dispensing and three fume hoods). All of the circuit board assembly processes (other than 3 circuit board coating stations) and the hand-held spray painting station are vented to a common air collection header. The air collection header is exhausted to the atmosphere via an upblast roof exhauster. The three circuit board coating stations are exhausted to a horizontal exhaust on the side of the building near the truck docks. Emissions from bench-top coating and painting stations are included in this emission unit.

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

Based on the Title V permit renewal application received November 6, 2006, this facility is not a major source of hazardous air pollutants (HAPs), but is a major source of VOC emissions.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

EU ID No.	Brief Description
-001	Roosevelt Facility – up to 10 conveyorized wave solder machines
-003	MLK Facility – up to 10 conveyorized wave solder machines
-004	Gandy Facility – up to 16 conveyorized wave solder machines, circuit board coating processes, and a hand-held spray painting station

Note: Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Table 1-1: Summary of Air Pollutant Standards and Terms
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Statement of Basis

These documents are on file with the permitting authority:
Initial Title V Air Operation Permit issued 05/07/2002
Title V Air Operation Permit Revision issued 01/31/2005
Application for a Title V Air Operation Permit Renewal received 11/06/2006
Additional Information Request dated 12/15/2006
Additional Information Response received 03/30/2007

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.
(Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.)

2. General Standards: 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 is 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.
[Rules 62-210.200, and 62-296.320(2), F.A.C.; Construction Permit 1030278-011-AC; Pinellas County Code, Section 58-178]

3. General Standards: Visible Emissions - Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1 and 62-296.320(4)(b)4, F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA)

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

and,

b. The permittee shall 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]

5. Insignificant Emissions Units and/or Activities - Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

6. General Standards: 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 (VOC) or organic solvents

6. *(continued)*

(OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The facility shall comply with the following:

a. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials.

b. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.

c. Tightly cover or close all VOC containers when they are not in use.

d. Prevent excessive air turbulence across exposed VOC surfaces.

e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.; Construction Permit 1030278-011-AC]

7. General Standards: Unconfined Particulate Matter 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, 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. At a minimum, the following precautions shall be taken by the permittee:

a. paving and maintenance of roads, parking areas, and yards;

b. landscaping or planting of vegetation;

c. use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter; and

d. proper operation of the equipment and general maintenance activities (e.g., replacement of equipment exhaust filters).

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit 1030278-011-AC]

8. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-4.070(3), F.A.C.]

9. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

(Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. and 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS))

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Air Program of the PCDEM:

Pinellas County Department of Environmental Management:
300 South Garden Street
Clearwater, FL 33756
Telephone: 727/464-4422, Fax: 727/464-4420

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

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

NOTES TO PERMITTEE:

Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Annual Operating Report (AOR) - see Appendix TV-6, item 24(3)

Annual Statement of Compliance - see Appendix TV-6, item 51

Permit Renewal Application - see Appendix TV-6, item 5.

Section III. Emissions Unit(s) and Conditions.

Subsection [A]. This section addresses the following emissions unit(s).

EU ID No.	Brief Description
-001	Roosevelt Facility- up to 10 conveyorized wave solder machines
-003	MLK Facility- up to 10 conveyorized wave solder machines
-004	Gandy Facility- up to 16 conveyorized wave solder machines, circuit board coating processes and a hand-held spray painting station

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity - Each facility shall operate no more than the following number of conveyorized wave solder machines:

EU ID No.	Facility	Number of conveyorized wave solder machines
001	Roosevelt Facility	10
003	MLK Facility	10
004	Gandy Facility	16

[Rules 62-4.160(2) and 62-210.200, F.A.C. ("Potential to Emit"); Construction Permit 1030279-011- AC]

A.2. Hours of Operation - Each emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200, F.A.C. ("Potential to Emit"); Construction Permit 1030279-011-AC]

Emission Limitations and Standards

A.3. Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emissions Limitations - The following global (combined emissions from the Roosevelt, MLK, and Gandy Facilities) emission limits apply:

a. total emissions of VOCs shall not exceed 242.6 tons in any 12 consecutive month period; and

b. total emissions of HAPs shall not exceed 5.0 tons in any 12 consecutive month period.

[Rule 62-210.200, F.A.C. ("Potential to Emit"); Construction Permit 1030279-011-AC]

Permitting Note: The facilities currently use isopropanol as a thinner and degreaser solvent, and a variety of alcohol-based fluxes. A change in the composition or usage that will result in an emissions increase above permitted levels will require a modification to this permit, approved by the Department prior to implementation.

Recordkeeping and Reporting Requirements

A.4. Facility Specific VOC and HAP Containing Materials Usage Records - Each facility (emission unit) specified in Specific Condition A.1., shall maintain a log to document compliance with Specific Condition No. A.3. At a minimum, the log shall identify and quantify all VOC and/or HAP containing materials used in the production of printed-circuit boards for each facility. Documentation of solvents consumed, such as during solvent cleanup, may use a mass-balance method to determine usage (amount used minus amount collected for disposal or recycle). The following information shall be recorded by the 10th day of the following month at each facility:

a. facility name, facility ID No., emission unit ID No., and description (e.g., Jabil Circuit, Inc., 1030278, EU 001, Roosevelt Facility);

b. monthly usage of each VOC and HAP containing material (gallons/month);

c. VOC and/or HAP content (lbs/gallon) of each item in A.4.b., above;

d. total HAP emissions (lbs/month or tons/month) based on A.4. b. and c.;

e. total VOC emissions (lbs/month or tons/month) based on A.4. b. and c.; and

f. cumulative total VOC and HAP emissions for the most recent 12 consecutive month period (tons/12 consecutive months) based on A.4. d. and e.

The log shall be maintained electronically by the Environmental Health and Safety (EHS) team. The EHS team will also maintain a cumulative log for all emissions. The log shall be accessible from all three facilities.

Supporting documentation (Material Safety Data Sheets, purchase orders, U.S. EPA "VOC DATA SHEETS", etc.) shall be kept for each thinner, flux, solvent, and other VOC and/or HAP containing materials used in the production of printed circuit boards that includes sufficient information to determine VOC and HAP emissions. The records shall be maintained for five years and made available to the Department and the Pinellas County Department of Environmental Management (PCDEM) upon request.

[Rules 62-4.070(3), 62-4.160, and 62-213.205(1)(i) F.A.C.]

A.5. Global VOC and HAP Containing Materials Usage Records - In addition to the requirements of Specific Condition No. A.4., the Environmental Health and Safety team (located at the Gandy facility) shall maintain a cumulative log for all emission units. The cumulative log shall be completed by the 20th day of the following month. At a minimum, the log shall contain the following information:

a. facility name, facility ID No., emission unit ID No., and description (e.g., Jabil Circuit, Inc., 1030278, EUs 001, 003 and 004, Roosevelt, MLK and Gandy Facilities);

b. the global, 12 consecutive month total of VOC emissions for all three facilities (lbs or tons); and

c. the global, 12 consecutive month total of HAP emissions for all three facilities (lbs or tons).

The location of the Environmental Safety and Health Department can be changed by notifying the Department and the PCDEM within 15 days of the change.

[Rules 62-296.500(2)(b) and 62-4.070(3), F.A.C.; Pinellas County Code, Section 58-90]