TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Sparton Electronics Florida, Inc.
5612 Johnson Lake Road
DeLeon Springs, FL 32130

DeLeon Springs Facility

Facility ID No. 1270180

PROJECT

Project No. 1270180-003-AO
Application for Minor Source Air Operation Permit
Project Name: Renewal

COUNTY

Volusia County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
Orlando, Florida 32803-3767

September 22, 2011

Prepared by Jeffrey Rustin, P.E.

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control - General Provisions); 62-210 (Stationary Sources - General Requirements); 62-212 (Stationary Sources - Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources - Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. <u>Project Description:</u>

A. Applicant:

Mr. Mark Madore, Director of Operations
Sparton Electronics Florida, Inc.
5612 Johnson Lake Road
DeLeon Springs, FL 32130

B. Project Location:

Sparton Electronics Florida, Inc.
5612 Johnson Lake Road
DeLeon Springs, FL 32130

C. Project Summary:

This is a Minor Source Operation Permit renewal.

D. Application Information:

Application Received on: 07/29/2011
Application Complete: 07/29/2011

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Visible emissions are limited to less than 20 percent opacity.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Source of VOC and potential odors.
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	Y	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Volusia County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS - 40 CFR 63)	N	There is no applicable source.

III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)
VOC	Facility	24
HAPs (total)	Facility	9

Actual Emissions reported for calendar year 2010 were 2.4 tons of VOC and 0.0 tons of total HAPs.

IV. Federal NSPS and/or NESHAP Provisions

None

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District Office, 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767, 407/897-2931.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

Florida Department of Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr
Secretary

Electronically Sent- Received Receipt Requested

FINAL PERMIT

PERMITTEE

Sparton Electronics Florida, Inc.
5612 Johnson Lake Road
DeLeon Springs, Florida 32130

Authorized Representative:
Mr. Mark Madore, Director of Operations

Air Permit No. 1270180-003-AO
Permit Expires: 08/30/2016
Site Name: DeLeon Springs Facility
Minor Source Air Operation Permit
Project Name: Renewal

This final air operation permit authorizes the renewal of Air Operation Permit No. 1270180-002-AO. The DeLeon Springs Facility (Standard Industrial Classification No. 3841) is located in Volusia County at 5612 Johnson Lake Road in DeLeon Springs, Florida. The UTM coordinates are Zone 17, 466.65 km East, and 3223.29 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emission 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.

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 Orange County, Florida

Caroline D. Shine — Sept. 22, 2011

Caroline D. Shine
District Air Program Administrator
Central District

Effective Date

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 9/22/11 to the persons listed below.

Mr. Mark Madore, Sparton Electronics Florida, Inc., **(mmadore@sparton.com)**
Mr. Scott Clark, Sparton Electronics Florida, Inc., **(sclark@sparton.com)**

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.

D. Wagner — 9/22/11

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

DeLeon Springs Facility

The DeLeon Springs Facility is an assembly and refurbishing plant dealing in high-reliability, low volume products such as those found in the aerospace and medical industries. This is an assembly plant only, relying on hand manipulations and processes. The three major areas of production at the facility are designated as anti-submarine warfare (ASW), medical equipment, and miscellaneous commercial ventures.

The existing facility consists of the following emissions unit.

Facility ID No. 1270180	
ID No.	Emission Unit Description
001	Electronic Assembly Operations

Project Description

This project is to renew Air Operation Permit No. 1270180-002-AO.

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

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(PSD), F.A.C.
- This facility is a minor source of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

PERMIT HISTORY/AFFECTED PERMITS

Replaces Permit No. 1270180-002-AO.

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

   Florida Department of Environmental Protection
   Central District Office
   Air Resource Management Section
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767 Telephone: 407-897-2931

   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 Central District 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; and
   c. Appendix C. Common Conditions.

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. 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.]

8. 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.; and

   c. copies of the most recent two months of records/logs specified in Specific Condition No. **A.7.**

   [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- Electronics Assembly Operations

This section of the permit addresses the following emission unit.

ID No.	Emission Unit Description
001	Electronics Assembly Operations (Collectively-regulated electronic assembly operations) Both of the following work areas are located inside the facility: 1) ASW Area includes individual work stations that perform hand soldering, potting and surface application of epoxy resins, spray paint surface coating, parts cleaning and solvent cleanup. Fugitive particulate emissions from spray painting are controlled by paint filters. 2) Medical Equipment Area and Miscellaneous includes hand soldering, parts cleaning, and solvent cleanup.

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.2. Visible Emissions Limitation: The visible emissions from each unit shall be limited to less than 20 percent opacity.
[Rule 62-296.320(4)(b)1., F.A.C.]

A.3. VOC/HAP Emissions Limitations: The maximum permitted emissions for total VOCs/HAPs and individual HAPs shall not exceed the following:

Pollutant	Emissions (tons per any consecutive 12-month period
Total VOCs	Less than 24.0
Total HAPs	Less than 9.0
Individual HAPs	Less than 9.0

[Rule 62-210.200, (PTE), F.A.C. and Permit No. 1270180-001-AC]

A.4. Objectionable Odor: 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 defined as 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 62-296.320(2) and 62-210.200, F.A.C.]

A.5. VOCs or Organic Solvents (OS): 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 (OS) 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:

a) Tightly cover or close all VOC containers when they are not in use;
b) Tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use;
c) Maintain all piping, valves, fittings, etc. in good operating condition;
d) Prevent excessive air turbulence across exposed VOCs; and
e) 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)(a), F.A.C.]

A.6. Unconfined Emissions: Pursuant to Rules 62-296.320(4)(c)1., 3., and 4., F.A.C., reasonable precautions to prevent unconfined emissions of unconfined particulate matter at this facility include the following requirements:

a) Chemical or water application to unpaved roads and unpaved yard areas;
b) Paving and maintenance of roads, parking areas and yards;
c) Landscaping or planting of vegetation;
d) Other techniques, as necessary; and
e) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter. Conduct a monthly visual inspection of each spray coating booth filter. Change filter if the filter condition is unsatisfactory.

[Rule 62-296.320(4)(c)2., F.A.C. and Permit No. 1270180-001-AC]

RECORDS AND REPORTS

A.7. Monthly Recordkeeping Requirements: In order to demonstrate compliance with Specific Condition No. **A.3.**, the permittee shall maintain a monthly log at the facility. At a minimum, the **monthly** log shall contain the following:

a) Designation of month and year of operation for which records are being tabulated.
b) Consecutive 12 month totals of VOC/HAP containing materials; and
c) Consecutive 12 month totals of VOC, combined HAPs, and individual HAP emission rates; and
d) Record observation details of each spray coating booth filter visual inspection (see Condition A.6.e.). When a filter is replaced, make a note of the replacement in the log.

The log shall be completed by the end of the following month and retained on file at the facility for a period of at least five (5) years from the date the data is recorded.

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 are available until such a time as a consecutive 12 month total can be maintained each month.
[Rule 62-4.070(3), F.A.C.]

A.8. Additional Recordkeeping Requirements: **Records specified in Specific Condition No. A.7. (previous condition) must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those used to derive emissions, must be clearly documented, and may be presented in the form of a template of sample calculations and available for review on site by the Department.**
[Rule 62-4.070(3), F.A.C.]

A.9. VOC Calculations: Volatile matter content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coatings, and inks, using EPA Reference Method 24 and 24A, or the Department shall accept a certification by the coating manufacturer of the composition of the coating if it is supported by standard formulation records for catalog paints or actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings". The documents shall be kept at the facility for at least five years and made available to the Department.
[Rules 62-4.070(3), and 62-296.513(4), F.A.C.]

A.10. Supporting Documentation: Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (the amount used minus the amount collected for disposal or recycle). Supporting documentation (chemical usage tracking logs, MSD sheets, emission factors, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) and including references to the VOC/HAP emission factors used, 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.
[Rule 62-4.070(3), F.A.C.]

A.11. Record Retention: **The records required in Specific Condition No. A.7. shall be recorded in a permanent form suitable for inspection and made available to the Department upon request. The records shall be maintained onsite for a minimum of five (5) years.**
[Rules 62-4.070(3) and 62-210.300(2)(b)1.e., F.A.C.]