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OCT 18 2011

SURFACE COATING OPERATIONS
AIR GENERAL PERMIT EXAMPLE REGISTRATION WORKSHEET
DIVISION OF AIR
RESOURCE MANAGEMENT

Facility Identification Number - If known (seven digit number)

0090233-001

Registration Type

Check one:

INITIAL REGISTRATION - Notification of intent to:

- Construct and operate a proposed new facility.
- Operate an existing permitted facility not currently using an air general permit (e.g., a facility proposing to go from an air operation permit to an air general permit). If the facility currently holds one or more air operation permits, such permit(s) must be surrendered by the owner or operator upon the effective date of this air general permit. (See "Surrender of Existing Air Operation Permit(s)" below.)
- Operates an existing facility not currently permitted or using an air general permit.

RE-REGISTRATION (for facilities currently using an air general permit) - Notification of intent to:

- Continue operating the facility after expiration of the current term of air general permit use.
- Continue operating the facility after a change of ownership.
- Make an equipment change requiring re-registration pursuant to Rule 62-210.310(2)(e), F.A.C.
- Any other change not considered an administrative correction under Rule 62-210.310(2)(d), F.A.C.

Surrender of Existing Air Operation Permit(s) - For Initial Registrations Only, if Applicable

All existing air operation permits for this facility are hereby surrendered upon the effective date of this air general permit; specifically permit number(s):

General Facility Information

Facility Owner/Company Name (Name of corporation, agency, or individual owner who or which owns, leases, operates, controls, or supervises the facility.)

Anuva Manufacturing Services, Inc.

Site Name (Name, if any, of the facility site; e.g., Plant A, Metropolis Plant, etc. If more than one facility is owned, complete registration must be submitted for each.)

Facility Location (Physical location of the facility, not necessarily the mailing address.)

Street Address: 7703 Technology Dr. Suite 102
City: West Melbourne County: Brevard

Zip Code: 32904
1573

Facility Start-Up Date (Estimated start-up date of proposed new facility.) (N/A for existing facility.)

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DIVISION OF AIR RESOURCE MANAGEMENT

SIC
3672

Facility Contact

Name and Position Title (Plant manager or person to be contacted regarding day-to-day operations at the facility.)

Print Name and Title: Michael Kimble

Facility Contact Telephone Numbers

Telephone: 321-821-4900 Fax: 321-821-4902
Cell phone: 321-544-5103
E-mail: mpat@anuvaservices.com

Facility Contact Mailing Address

Organization/Firm: Anuva Manufacturing Services, Inc
Mailing Address: 7703 Technology Dr Suite. 102
City: West Melbourne County: Brevard Zip Code: 32904-1573

Other Contact/Representative (to serve as additional Department contact)

Name and Position Title

Print Name and Title: Jim Davis

Other Contact/Representative Telephone Numbers

Telephone: 321-821-4900 Fax: 321-821-4902
Cell phone: _____
E-mail: jdavis@anuvaservices.com

Other Contact/Representative Mailing Address

Organization/Firm: Same as above
Mailing Address: _____
City: _____ County: _____ Zip Code: _____

Government Facility Code (check only one)

- Facility not owned or operated by a federal, state, or local government.
- Facility owned or operated by the federal government.
- Facility owned or operated by the state.
- Facility owned or operated by the county.
- Facility owned or operated by the municipality.
- Facility owned or operated by a water management district.

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Material Usage Rates

Please See Attached

If this is an **initial registration** for a surface coating operation, provide an estimate of the average quantity of **volatile organic compounds** in all coatings (solvents and thinners) expected to be used on a daily basis.

If this is a **re-registration** for an existing surface coating operation, provide the highest monthly average of the daily quantity of volatile organic compounds in all coatings (solvents and thinners) used in the last five years. Indicate the month and year during which this usage occurred.

Description of Facility

Below, or as an attachment to this form, provide a description of the surface coating operations at the facility in sufficient detail to demonstrate the facility's eligibility for use of this air general permit and to provide a basis for tracking any future equipment or process changes at the facility. Describe all air pollutant-emitting processes and equipment at the facility, and identify any air pollution control measures or equipment used.

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Helpful Definitions

- “Coating” - The application of a protective, decorative, or functional film to a surface.
- “Department” or “DEP” - The State of Florida Department of Environmental Protection.
- “Emissions Unit” - Any part or activity of a facility that emits or has the potential to emit any air pollutant.
- “Facility” - All of the emissions units which are located on one or more contiguous or adjacent properties, and which are under the control of the same person (or persons under common control).
- “Owner” or “Operator” - Any person or entity who or which owns, leases, operates, controls or supervises an emissions unit or facility.

Tina Patel

From: "Michael Kimble" <mkimble@anuvaservices.com>
To: <tpatel@anuvaservices.com>
Sent: Monday, September 26, 2011 3:14 PM
Subject: Description of Facility

Hello Tina,

You can use this as an attachment for the Description of Facility section.

In the new facility we will have 3 conformal coat booths use to hand coat the printed circuit boards using a brush. Only about 30 percent of the printed circuit boards that we manufacture require this coating. The coating we use is Humiseal 1B31 with Humiseal 521 thinner. We have consumed 6 gallons of the 1B31 conformal coating and 4 gallons of the 531 thinner in the past 6 months.

In regard to any air pollutant-emitting processes we will have one surface mount line that uses solder paste that contains flux. This solder paste is used to hold the part in place and solder the part to the board during the reflow process (bring the board to a high enough temp to melt the solder in the paste). During this reflow process the flux will activate and clean the pads on the board to create a good solder joint. The oven is vented to the exterior of the building. We primarily use FCT WS-159 solder paste.

We have one wave solder machine that has flux sprayed on the bottom of the board for the purpose of cleaning the pads on the board prior to going over the molten solder. We currently use Alpha 857 water soluble flux and Kester 979 no clean flux. We occasionally will try other fluxes but mostly use the two stated above.

We occasionally use RTV sealant dispensed from a tube.

-Mike

Michael Kimble
Director of Manufacturing Engineering
Anuva Manufacturing Services
4005 Dow Road
Melbourne, FL. 32934
P - (321)622-8651
mkimble@anuvaservices.com

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PENDING

From: Dibble, Dickson
 Sent: Monday, October 24, 2011 3:47 PM
 To: 'mkimble@anuvaservices.com'
 Cc: Arif, Syed; 'tpatel@anuvaservices.com'; 'jdavis@anuvaservices.com'
 Subject: Surface Coating Operations Air General Permit Registration Worksheet
 Attachments: 0090233;AnuvaManufacturingServicesInc7703TechnologyDrWMelbourne.pdf

Tracking:	Recipient	Delivery
	'mkimble@anuvaservices.com'	
	Arif, Syed	Delivered: 10/24/2011 3:47 PM
	'tpatel@anuvaservices.com'	
	'jdavis@anuvaservices.com'	

Dear Mr. Kimble,

I have received the subject item registration worksheet (see attached .pdf file) which you have submitted as your notification of intent to use the Surface Coating Operations Air General Permit Registration at your facility.

I am in need of additional information. Page four (4) of the registration, under **Material Usage Rates**, for **initial registrations** and the applicable rule (**Rule 62-210.310(4)(c)3.a., F.A.C.**) requests the following information (see highlighted text):

(c) Air General Permit for Facilities Comprising Surface Coating Operations.

1. A facility comprising one (1) or more surface coating operations shall be eligible to use this air general permit provided it meets the general eligibility criteria of paragraph 62-210.310(2)(a), F.A.C., and the following specific criteria.
 - a. The facility shall use no other air general permit.
 - b. The facility shall not be subject to any unit-specific limitation or requirement other than any such limitation or requirement set forth in this air general permit.
2. A facility using this air general permit shall comply with the general conditions given at subsection 62-210.310(3), F.A.C., and the following specific conditions.
 - a. The total quantity of volatile organic compounds in all coatings used shall not exceed forty-four (44) pounds per day, averaged monthly, where coatings used shall include all solvents and thinners used in the process or for cleanup.
 - b. The owner or operator shall maintain records to document the VOC content and the quantity of coatings used. The owner or operator shall retain these records, available for Department inspection, for a period of at least five (5) years.
3. The registration for this air general permit shall include all the following information.
 - a. For initial registrations, an estimate of the average quantity of volatile organic compounds in all coatings (solvents and thinners) expected to be used on a daily basis.
 - b. For re-registrations, the highest monthly average of the daily quantity of volatile organic compounds in all coatings (solvents and thinners) used in the last five years, and the month and year during which this usage occurred.

The registration worksheet submitted, including your e-mail to Ms. Tina Patel, as an attachment to your registration, indicated that ***"The coating we use is Humiseal 1B31 with Humiseal 521 thinner. We have consumed 6 gallons of the 1B31 conformal coating and 4 gallons of the 531 thinner in the past 6 months"***.

In order for me to continue with the review and processing of your registration, I will need an estimate of the average quantity of volatile organic compounds (VOC's) in all coatings (solvents & thinners) expected to be used on a daily basis. The applicable rule (Rule 62-210.310(4)(c)2.a., F.A.C.) refers to the VOC's of all coatings, solvents, and thinners, in pounds (lbs.). As the result, the VOC information you provide should be expressed in lbs. rather than in gallons.

Let me also offer some additional information which may assist you in your own analysis and determination of your Air General Permit eligibility as provided for in the rules. Regarding exemptions from permitting, you may refer to Rule 62-210.300(3)(a)27., F.A.C., Categorical and Conditional Exemptions, Surface coating within a single facility, provided all of the following conditions are met. (See below.)

27. Surface coating operations within a single facility, provided all the following conditions are met.

- a. The surface coating operation shall use only coatings containing 5.0 percent or less VOC, by volume, or the total quantity of coatings containing greater than 5.0 percent VOC, by volume, used at the facility shall not exceed 6.0 gallons per day, averaged monthly, where the quantity of coatings used includes all solvents and thinners used in the process or for cleanup.
- b. Such operations are not subject to any unit-specific limitation or requirement.

I hope this helps, but if you have any questions, comments or concerns please e-mail or call.

Thank you and have a great day!

Sincerely yours,

Dickson E. Dibble

Dickson E. Dibble, ES III

Air General Permit Program
FDEP Division of Air Resource Management
Office of Permitting & Compliance
Minerals & Metals Section
Tel. (850) 717-9071
FAX (850) 717-9001
GIC - #59571
Dickson.Dibble@dep.state.fl.us



Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure