



Environmental Protection and Growth Management Department
ENVIRONMENTAL ENGINEERING AND PERMITTING DIVISION
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September 14, 2017

Andrew Johns, Facilities Manager
J. L. Audio, Inc.
10369 North Commerce Parkway
Miramar, Florida 33025

AIRS ID No. 0112652
PROJECT: 0112652-004-AF

**VIA ELECTRONIC MAIL
ELECTRONIC RETURN RECEIPT REQUESTED**

RE: Minor Modification of Air Permit 0112652-003-AF Issued April 4, 2017.

Dear Mr. Johns:

On June 9, 2017, we received your request for the addition of two installed small paint spray booths that will be used for surface coating using aerosol paint spray cans. The facility is already authorized to operate four paint spray booths and this request is considered a minor modification pursuant to 62 -210.200(183), F.A.C. – Modification. The impact on the volatile organic compounds (VOC) and hazardous air pollutants emissions (HAP) are negligible based on the amount of aerosol paint to be used in the small paint spray booths. This facility has emission limitations of 100 tons per year (TPY) VOC, 5 TPY individual HAP and 25 TPY total HAP in order to escape the applicable requirements in 40 CFR 63, Subpart WWWW – National Emissions Standards of Hazardous Air Pollutants (NESHAPS) Reinforced Plastic Composites Production. Per J.L. Audio’s request, the current air permit is revised, with no changes to applicable requirements, as follows:

FROM: Section 1- General Information, page 4.

FACILITY DESCRIPTION

This facility manufactures audio equipment and entertainment systems for automobiles and wooden speaker enclosures. The facility consists of a fiberglass application and resin lay out and four paint spray booths for the fiberglass, gel coat application and layout. These emission units exhaust to the atmosphere through one exhaust stack for each spray booth. There are two grinding booths which do not exhaust to the atmosphere and are therefore not considered air pollution sources.

This operation consists of reinforced plastics molding to fabricate speakers for automobile audio systems using about 80% closed and 20% open molding operations. Fifty percent (50%) of the high performance speakers are manufactured at the facility, and the other 50% are manufactured in Kentucky and China. The contact cement (glue) and the fiberglass are sprayed in the spray booths and the resin and adhesives are applied manually using a dispensing tube. The contact cement is applied partially with a brush, and sprayed on the carpet, that covers the speakers.

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 are 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 use a variety of products, some non-VOC and non-HAP. Primer is also used with a brush. The gel coat and accelerator are sprayed inside the spray booths.

The process flow diagram of the facility is shown in Attachment A.

The facility consists of the following emissions unit (EU) as described in Section 4 – Emissions Unit Specific Conditions, page 9.

EU ID	Description of Emissions Unit
001	A reinforced plastic molding fiberglass application and resin lay out with 80% closed and 20% open molding operation. There are four spray booths, each exhausting to the atmosphere through its own exhaust stack.

Permitting Note: There are two grinding booths, which do not exhaust to the atmosphere, that are considered exempt emissions units.

TO: Section 4 - Emissions Unit Specific Conditions, page 9.

FACILITY DESCRIPTION

This facility manufactures audio equipment and entertainment systems for automobiles and wooden speaker enclosures. The facility consists of a fiberglass application and resin lay out and six paint spray booths for the fiberglass, gel coat application and layout. These emission units exhaust to the atmosphere through one exhaust stack for each spray booth. There are two grinding booths which do not exhaust to the atmosphere and are therefore not considered air pollution sources.

This operation consists of reinforced plastics molding to fabricate speakers for automobile audio systems using about 80% closed and 20% open molding operations. Fifty percent (50%) of the high performance speakers are manufactured at the facility, and the other 50% are manufactured in Kentucky and China. The contact cement (glue) and the fiberglass are sprayed in the spray booths and the resin and adhesives are applied manually using a dispensing tube. The contact cement is applied partially with a brush, and sprayed on the carpet, that covers the speakers.

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 are 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.

The facility uses a variety of products, some non-VOC and non-HAP. While primer is applied with a brush, the gel coat and accelerator are sprayed inside the spray booths.

The process flow diagram of the facility is in Attachment A.

Section 4 –Emissions Unit Specific Conditions, page 9.

EU ID	Description of Emissions Unit
001	A reinforced plastic molding fiberglass application and resin lay out with 80% closed and 20% open molding operation. There are six spray booths, each exhausting to the atmosphere through its own exhaust stack.

Permitting Note: There are two grinding booths, which do not exhaust to the atmosphere, that are considered exempt emissions units. The two newly installed small paint spray booths to be used for surface coating using aerosol paint spray cans are expected to produce an insignificant amount of air emissions.

This letter must be attached to the original permit to become part of the current permit. The remaining provisions of the permit, including the expiration date, are not changed by this action and remain in effect.

A person whose substantial interests are affected by the Environmental Engineering Division (EPPD) proposed permitting decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the office of the Broward County Attorney at 115 S. Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this modification. A petitioner must 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 (or a request for mediation, as discussed below) 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 28-5.207, F.A.C.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant’s name and address, the Permit File Number, and the county in which the project is proposed;
A statement of how and when each petitioner received notice of the EPPD’s action or proposed action;
- (b) A statement of how each petitioner’s substantial interests are affected by the PPD’s action or proposed action;
- (c) A statement of the material facts disputed by the petitioner, if any;
- (d) A statement of the facts that the petitioner contends warrant reversal or modification of the
- (e) EPPD’s action or proposed action;

- (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the EEPD's action or proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the EEPD's to take with respect to the action or proposed action addressed in this modification.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EEPD's final action may be different from the position taken by it in this modification. Persons whose substantial interests will be affected by any such final decision of the EEPD 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 for this action.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, from the Florida Department of Environmental Protection (the Department) under section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this modification.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements remain fully enforceable by the Administrator of EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

