



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

FINAL PERMIT

PERMITTEE

Sparton Brooksville, LLC
30167 Powerline Road
Brooksville, FL 34602

Authorized Representative:
Mr. Martin Reilly, Assistant Secretary

Air Permit No. 0530369-004-AO
Permit Expires: 05/07/2020
Site Name Brooksville Facility
Minor Air Operation Permit
Project: Operation Permit Renewal

This is the final permit to renew Air Operation Permit No. 0530369-003-AO for a printed circuit board operation that manufactures high reliability circuit boards for military and various aerospace type applications at the Brooksville Facility (Standard Industrial Classification No. 3679). The facility is located in Hernando County at 30167 Powerline Road in Brooksville, Florida. The UTM coordinates are Zone 17, 378.19 km East, and 3151.16 km North.

This final permit is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements
- 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 hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this final permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile 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 each petitioner received notice of the agency action or proposed decision; (d) A

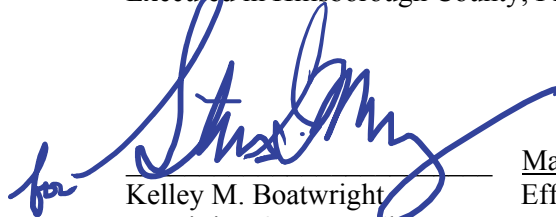
statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific 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 the 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 Permitting Authority'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, F.A.C.

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



Kelley M. Boatwright
Permitting & Waste Cleanup Program Administrator
Southwest District

May 7, 2015

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (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 the date indicated below to the persons listed below.

Martin Reilly, Sparton Corporation (mreilly@sparton.com)

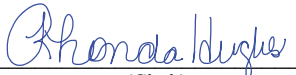
James Heisler, Sparton Brooksville, LLC (jheisler@sparton.com)

Danielle Henry, SWD Compliance Assurance Program Team Manager, (danielle.henry@dep.state.fl.us)

Shannon Camp, SWD Compliance Assurance Program, (Shannon.camp@dep.state.fl.us)

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)

May 7, 2015
(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility manufactures high reliability circuit boards for military and various aerospace type applications. It consists of the following emission unit (EU).

Facility ID No. 0530369	
EU ID No.	Emissions Unit Description
001	Printed Circuit Board Manufacturing

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 (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 natural minor source of VOCs and HAPs.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Operation Permit No. 0530369-003-AO.

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 Office's Air and Solid Waste Permitting Program. The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air_Permitting@dep.state.fl.us

All documents related to applications for permits shall be submitted to the above e-mail address and/or address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air@dep.state.fl.us

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above e-mail address and/or address.

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.]

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

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 this operation permit. To properly apply for an operation permit, the applicant shall submit the following:
- 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/>*);
 - the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and
 - copies of the most recent month of records/logs specified in Specific Condition Nos. A.8. and A.9.
- [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.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Printed Circuit Board Manufacturing

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	<p>Printed Circuit Board Manufacturing - This emission unit collectively regulates all wave solder lines (a maximum of 5 lines), conformal coating machines, conformal coating/paint spray booths, IR ovens, curing ovens and any other activity/equipment related to the manufacturing of high reliability circuit boards.</p> <p>The circuit board manufacturing process generally consists of the following steps:</p> <ol style="list-style-type: none">1. Unpopulated circuit printed boards (obtained from an outside vendor) are screen printed with solder paste to prepare them for surface mounted component placement.2. The boards then pass through surface mounting machines for placement of components.3. Surface mounted boards are then moved through infrared (IR) ovens to flow the solder paste and bond the surface mounted components to the boards.4. Surface mounted boards are then populated with through board components either by hand at bench top stations or through automated placement machines.5. The boards are then soldered in wave solder machines or at bench-top stations. Thinners and flux that contain volatile organic compounds (VOC) are used in soldering. VOC emissions are not controlled and are vented from all wave solder machines and some bench-top stations via ductwork to the outside.6. Soldered boards are then washed in an aqueous cleaner system and air-dried.7. Soldered and washed boards are then coated with a conformal coating (via automated conformal coaters or by hand in designated conformal coating/paint spray booths) to protect the completed boards. Thinners used in the conformal coating process may contain hazardous air pollutants (HAPs) and/or VOCs. Emissions are not controlled and are vented via ductwork to the outside. <p>This emission unit also encompasses lead chloride and silver chloride battery production lines and associated equipment. The battery production lines are not subject to the requirements of 40 CFR 60, Subpart KK, Standards of Performance for Lead-Acid Battery Manufacturing Plants. Emissions of lead (a HAP) from the lead-acid battery production line are generated during the dry mixing of lead and carbon. The mixing process takes place inside the building in an enclosed mixer equipped with a vacuum line to a dust collector with a HEPA filter. Particulate matter (PM) emissions are also generated while material is poured into the loading hopper and while being transferred to the mixer. The vacuum system also captures PM emissions from these activities. Isopropyl alcohol and methanol (from cleaning wipes) emissions are generated during the production process. The lead chloride and silver chloride battery production lines do not vent to the outside environment.</p>

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 (definition of Potential to Emit), F.A.C.; Construction Permit No. 0530369-001-AC]
- A.2.** Facility Layout – The equipment as described in the Emission Unit Description section of this permit may be relocated in the same building in accordance with the following:
- a. Within thirty (30) days of relocating the equipment, the permittee shall revise the Facility Floor Plan.

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Printed Circuit Board Manufacturing

- b. Revised drawings shall clearly identify the equipment that is relocated and the date(s) of the relocation.
- c. Revised drawings shall be maintained on file at the facility for at least 3 years. Note, the drawing showing the most recent equipment location shall always be on file at the facility.

Permitting Note: The facility may replace component(s)/part(s) with the same and/or equivalent technology, as necessary, provided that such change(s) do not cause the maximum number of wave solder lines and/or any other limitations of this permit to be exceeded.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0530369-001-AC]

EMISSIONS STANDARDS

- A.3.** Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emission Limitations – Total VOC and total HAP emissions shall not exceed the following:

Pollutant	Emission Limitation (tons per any consecutive 12-month period)
Total VOCs	24.0 ²
Total HAPs ¹	8.0 ³

¹ The total HAP emission limitation of this permit will ensure that no individual HAP emission triggers Title V permitting requirements.

² This limit shall include a conservative constant value of 2.0 tons per any consecutive 12-month period to account for usage of miscellaneous VOC containing products such as threadlockers, adhesives, sealers, resins, detergents, coatings and/or other equivalent items. This conservative constant value shall be used to determine compliance with the total VOC limit.

³ This limit shall include a conservative constant value of 0.25 tons per any consecutive 12-month period to account for usage of miscellaneous HAP containing products such as threadlockers, adhesives, sealers, resins, detergents, coatings and/or other equivalent items. This conservative constant value shall be used to determine compliance with the total HAP limit.

[Rule 62-210.200, F.A.C., (“Potential to Emit”); Construction Permit No. 0530359-001-AC]

- A.4.** Volatile Organic Compounds (VOC)/Organic Solvents (OS) – No person shall store, pump, handle, process, load, unload, or use in any process or installation any VOC/OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

- a. Maintain covers, lids, etc., on all containers of VOC/OS when they are not being handled, tapped, etc.
- b. Prevent excessive air turbulence across exposed VOC/OS.
- c. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough basin, bath, etc., of VOC/OS so that it can be covered when not in use.
- d. All fittings, valve lines, etc., shall be properly maintained.

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Printed Circuit Board Manufacturing

- e. All VOC/OS spills shall be attended to in a timely manner and the wasted properly disposed of, recycled, etc.

[Rule 62-296.320(1), F.A.C.; Construction Permit No. 0530369-001-AC]

- A.5. General Visible Emission (VE) Limit – No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity (see also *Specific Condition No. A.7.*).

[Rule 62-296.320(4)(b)1, F.A.C.]

- A.6. Unconfined Emissions of Particulate Matter – All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter (PM). 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 maintenance of roads, parking areas and yards.
- b. Application of water or chemicals to control emission from such activities as demolition of buildings, grading roads, construction, and land clearing.
- c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
- d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulates from becoming airborne.
- e. Landscaping or planting of vegetation.
- f. Use of hoods, fans, filters, spray booths and similar equipment to contain, capture and/or vent PM.

Permitting Note: If operating experience indicates that these reasonable precautions are not sufficient to control unconfined emissions, the Department or its designee reserves the right to require additional measures.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; Construction Permit No. 0530369-001-AC]

- A.7. Fugitive Emissions Opacity Standard – As an indicator that the precautions to control unconfined particulate matter emissions as required by Specific Condition No. A.6. are adequate, emissions of unconfined particulate matter from the facility (including the conformal coating/paint spray booths) should not exceed 5%. If this value is exceeded, it shall not be a violation in and of itself, but an indication that additional control precautions and/or work practices beyond those of Specific Condition No. A.6. may be necessary.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0530369-001-AC]

RECORDKEEPING AND REPORTING REQUIREMENTS

- A.8. VOC Recordkeeping - In order to determine compliance with the VOC emission limitations of Specific Condition No. A.3., the following recordkeeping shall be maintained monthly:

- a. Facility Name, Facility ID No. (0530369), Emission Unit No., and Month/Year.
- b. The total quantity (gallons) and VOC content (lbs/gallon) of each VOC containing material (thinner, flux, solvent, etc.) used for EU 001 for the month.

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Printed Circuit Board Manufacturing

- c. The calculated monthly total VOC emissions, in pounds or tons per month (based upon material VOC content), for EU No. 001.
- d. A cumulative total of the VOC emissions for the most recent consecutive 12-month period (tons per consecutive 12-month period), for EU No. 001*.

*Emissions from the miscellaneous VOC containing products detailed in Specific Condition No. A.3. shall be reported as a constant 2.0 tons per any consecutive 12-month period in lieu of individually tracking such products and/or their equivalents.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0530369-001-AC]

A.9. HAP Recordkeeping - In order to determine compliance with the HAP emission limitations of Specific Condition No. A.3., the following recordkeeping shall be maintained monthly:

- a. Facility Name, Facility ID No. (0530369), Emission Unit No., and Month/Year.
- b. The total quantity (gallons) and HAP content (lbs/gallon) of each HAP containing material (thinner, flux, solvent, etc.) used for EU 001 for the month.
- c. The calculated monthly HAP emissions for total HAPs, in pounds or tons per month (based upon material HAP content), for EU 001.
- d. A cumulative total of the HAP emissions for total HAPs for the most recent consecutive 12-month period (tons per consecutive 12-month period), for EU 001*.

*Emissions from the miscellaneous HAP containing products detailed in Specific Condition No. A.3. shall be reported as a constant 0.25 tons per any consecutive 12-month period in lieu of individually tracking all such products and/or their equivalents.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0530369-001-AC]

A.10. Documentation – Supporting documentation (e.g., MSDS sheets, “As Supplied” sheets, “As Applied” sheets, purchase orders, inventory records, production records, etc.) for the records required by Specific Condition Nos. A.8., and A.9., which shall include sufficient information to determine VOC and HAP emissions, shall also be kept. At the permittee’s option, “quantity purchased” may be reported to satisfy the requirement of “quantity used”, provided no materials are used which are not purchased.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0530369-001-AC]

A.11. Records Retention – The records required by Specific Condition Nos. A.8., A.9. and A.10. shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained at the facility for a minimum of the most recent three (3) year period. Monthly records/logs shall be completed by the end of the following month.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0530369-001-AC]