

Florida Production Engineering, Inc.
Ormond Beach Facility

DRAFT Permit No.: 12700102-009-AV
Facility ID No.: 1270102

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of wheel cover manufacturing operations and airbag cover manufacturing operations. The wheel cover operations include manufacturing cells no. 1, 2, 3, 4, 5, 12, and Deco Manufacturing Cell. Each wheel cover manufacturing cell includes paint spraying and paint drying. Each paint spray booth is equipped with paint filters to control particulate emissions. The air bag cover manufacturing operations include manufacturing cells A, B, C, D, and E. Each air bag manufacturing cell contains two promoter spray booths, two topcoat spray booths, and one gas-fired curing oven.

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

Based on the Title V Air Operation Permit Revision application received February 18, 2008, this facility is not a major source of hazardous air pollutants (HAPs).

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

E.U. ID No./Brief Description

016 Manufacturing Cells A, B, C, D, E; and No. 1, 2, 3, 4, 5, 12; and Deco Manufacturing Cell.

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, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/I.D. Number Changes

These documents are on file with permitting authority:

Initial Title V Air Operation Permit issued March 5, 1998.

Renewal Title V Air Operation Permit issued February 21, 2002.

Construction Permit issued August 20, 2007.

Subsection D. Miscellaneous.

The use of "Permitting Notes" throughout this permit are for informational purposes only and are not permit conditions.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. 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 Rule 62-297, F.A.C.

[Rule 62-296.320(4)(b)1. & 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
P.O. Box 1515
Lanham-Seabrook, Maryland 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 Pollutant Emission Limiting 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 (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 VOC's,
- 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.]

8. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department of Environmental Protection's Central District office:

Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803
Telephone: 407/894-7555

10. 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 Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9099; Fax: 404/562-9095

{Permitting Note: This condition implements the requirements of Rules 62-210.370(3) F.A.C. (see Condition 24. of APPENDIX TV-6, TITLE V CONDITIONS.)}

11. 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.]

Annual Statements

13. Annual Operating Report. The owner or operator shall complete DEP Form No. 62-210.900(5), F.A.C., "Annual Operating Report for Air Pollutant Emitting Facility," for each calendar year and submit it either electronically using the latest Department Annual Operating Report software or by hard copy to the air compliance section of this office on or before March 1 of the following year in accordance with Rule 62-210.370(3), F.A.C. The emissions shall be computed in accordance with the provisions of Rule 62-210.370(2), F.A.C., for the purposes of the annual operating report. The address for the Central District is the following:

Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803
Telephone: 407/894-7555

{Permitting Note: This condition implements the requirements of Rules 62-210.370(3) F.A.C. (see Condition 24. of APPENDIX TV-6, TITLE V CONDITIONS.)}

14. 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. The required elements of the compliance certification are listed in 40 C.F.R. Part 70.6(c)(5)(iii) as indicated in Condition Number 51 of Appendix TV-6, Title V Conditions.

[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. & 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS.)}

Permit Renewal

15. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to this office four copies of the air permit application, DEP Form No. 62-210.900(1). [Rule 62-4.090(1), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

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

E.U. ID No./ Brief Description

016 Manufacturing Cells A, B, C, D, E; and No. 1, 2, 3, 4, 5, 12 and Deco Manufacturing Cell.

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

Essential Potential to Emit (PTE) Parameters

A1. Methods of Operation. Each oven shall be fired by natural gas or propane only. The total oven maximum heat input rate is 74,049 MMBTU per consecutive 12 months.
[Rule 62-4.160(2), F.A.C and construction permits 1270102-004-AC and 1270102-008-AC.]

A2. Hours of Operation. The hours of operation are not limited.
[Rules 62-4.160(2), and 62-210.200, (PTE), F.A.C.]

A3. For manufacturing cells B, C, D, and E, all spray booths shall use HVLP (high pressure, low flow) spray guns with robotic arms.
[Rule 62-4.160(2), F.A.C and construction permits 1270102-004-AC and 1270102-008-AC.]

A4. No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650, F.A.C.]

A5. All reasonable precautions shall be taken to prevent emissions of unconfined particulate matter. Reasonable precautions include:

- a) Water application to unpaved roads or unpaved yard areas;
- b) Paving or maintenance of roads;
- c) Landscaping or planting of vegetation; and
- d) Other techniques, as necessary

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

Emission Limitations and Standards

A6. The maximum facility total Volatile Organic Compound (VOC) emissions are limited to less than 249.0 tons per consecutive 12 months, total Hazardous Air Pollutant (HAP) emissions are limited to less than 25.0 tons per consecutive 12 months, and each HAP emission is limited to less than 10.0 tons per consecutive 12 months, per the application.
[Rule 62-210.200, (PTE), F.A.C. and construction permit 1270102-008-AC.]

A7. Visible emissions from the facility are limited to less than 20% opacity.
[Rule 62-296.320(4)(b)1., F.A.C.]

Recordkeeping and Reporting Requirements

A8. The permittee shall demonstrate compliance with emission limitations in specific condition **A6.** by using one of the following methods:

- a) Testing each coating batch using EPA Method 24 as contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C.
- b) Obtaining and maintaining a written manufacturer's certification of the composition of each batch coating, supported by actual batch formulation records. The manufacturer's certification must be consistent with EPA's documentation number 405/3-84-019, "Procedures for Certifying Quantity of Volatile Organic Compound Emitted by Paint, Ink, and other Coatings" or other similar documents approved by the Department.
- c) Obtaining and maintaining current written MSDS for each batch shipment of coating. The MSDS may be kept by paper or electronic filing.

Records of the information required in this specific condition shall be maintained in accordance with Specific Condition **A9.** of this permit.

A9. In order to demonstrate compliance with specific condition numbers **A1.** and **A6.**, the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded. The log, at a minimum, shall contain the following:

Monthly

- a) Designation of the month and year of operation for which records are being tabulated;
- b) Consecutive 12-months total of VOC emissions, total HAP emissions, and each HAP emission;
- c) One month total of VOC emissions, total HAP emissions, and each HAP emission; and
- d) Consecutive 12-months total of oven heat input (in units of MMBTU).

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

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 is available until such a time as a consecutive 12-month total can be maintained each month.

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

Logs must document the method, calculations, and formulas used in determining the usage rate and the emission rate. This includes, but is not limited to, the product name, density, individual and total HAP contents, and individual and total VOC content. All calculations, including those used to derive emission credits for mass balance, must be clearly documented, and may be presented in the form of a template of sample calculations, which is filed with the logs required in this specific condition and available for review on site by regulatory inspectors.

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

A10. Supporting documentation (chemical usage tracking logs, MSDS, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated

products, and must include sufficient information to determine usage rates and emissions. The permittee shall maintain records of all testing conducted in accordance with Method 24. If MSDS or certified product sheets are used, the paper or electronic records must be obtained and maintained for each shipment received. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycling). The log and documents shall be kept at the facility for at least five years and made available to the Department upon request. The monthly logs shall be completed by the end of the following month. [Rules 62-4.070(3), F.A.C. and 62-213.440(1)(b)2.b., F.A.C. and Appendix TV-6, Condition No. 42.]