TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Honeycomb Company of America, Inc.
1950 Limbus Avenue
Sarasota, FL

Sarasota Facility

Facility ID No. 0810246

PROJECT

Project No. 0810246-001-AC
Application for Minor Air Construction Permit
Project Name: Manufacturer of aircraft composite structures, assemblies and parts

COUNTY

Manatee County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air and Solid Waste Permitting
Southwest District Office
Temple Terrace, Florida 33637-0926

February 5, 2015

Prepared by Nancy E. Knight

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. Facility Description:

This facility is an aerospace products and parts manufacturing company. The facility manufactures bonded metal-to-metal, metal-to-honeycomb and honeycomb to epoxy-composite assemblies for military aircraft.

II. Project Description:

A. Applicant:

Jerry Parker, Plant Manager
Honeycomb Company of America, Inc.
1950 Limbus Avenue
Sarasota, FL 34243

B. Professional Engineer:

Salahuddin K. Mohammad, P.E.
Golder Associates, Inc.
6026 NW 1st Place
Gainesville, FL 32607

C. Project Location:

1950 Limbus Avenue
Sarasota, FL 34243

D. Project Summary:

This is an after-the-fact air construction permit for a manufacturer of aircraft composite structures, assemblies and parts, as further described in the permit.

E. Application Information:

Application Received on: 12/01/14
Additional Information Requested on: 12/30/14
Additional Information Received on: 1/15/15
Application Complete on: 1/15/15

III. Applicable State and Federal Regulations

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 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
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	machining operations could be a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	painting operations are a source of VOC and odors
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Manatee County is not an air quality maintenance 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 category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category
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)	Y	EU No. 001 is subject to 40 CFR 63, Subpart HHHHHH; however, this subpart has not been adopted by the State of Florida.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a natural minor source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Testing is not required. Compliance is demonstrated via recordkeeping.

IV. Summary of Emissions

Pollutant	**EU No. and brief description**	**Potential Emissions** (tons per year)	**Allowable Emissions** (tons per year)
VOC	001- Surface Coating Operations	24.0	24.0
	Total	**24.0**	**24.0**
Total HAP	001 – Surface Coating Operations	10.0	10.0
	Total	**10.0**	**10.0**
Individual HAP - Chromium Compounds	001 – Surface Coating Operations	8.0	8.0
	Total		**8.0**
VE Limitation			
VE	001 – Surface Coating Operations		20% (General VE)

Note: These emission limits were requested by the applicant to minimize the fees required for a construction permit. The facility is designated as a natural minor source based on reasonable assurance detailed in a statement signed and sealed by Salahuddin K. Mohammad, P.E. for Golder Associates, Inc., dated 02/05/15, stating that the expanded Honeycomb Company of America, Inc., authorized by this construction permit (0810246-001-AC) does not have the potential to be a Title V source of VOC or HAP emissions.

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 proposed 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, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

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).