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

DRAFT PERMIT

PERMITTEE

Honeycomb Company of America, Inc.
1950 Limbus Avenue
Sarasota, FL 34243

Authorized Representative:
Mr. Jerry Parker, Plant Manager

Air Permit No. 0810246-001-AC
Permit Expires: 12/31/2015
Sarasota Facility
Minor Air Construction Permit
Project: Aircraft parts manufacturer

This is the final after-the-fact air construction permit for a manufacturer of aircraft composite structures, assemblies and parts. The proposed work will be conducted at the Sarasota Facility (Standard Industrial Classification No. 3728). The facility is located in Manatee County at 1950 Limbus Ave., in Sarasota, Florida. The UTM coordinates are Zone 17, 347.7 km East, and 3033.4 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 (Mail Station #35, 3900 Commonwealth Boulevard, 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

DRAFT

_____ _____

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, 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.

Jerry Parker, Honeycomb Company of America, Inc.
jparker@hcoainc.com

Salahuddin K. Mohammad, P.E., Golder Associates, Inc.
smohammad@golder.com

Danielle D. Henry, SWD Compliance Assurance Program Team Manager
danielle.d.henry@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.

DRAFT

_____ _____
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Project Description and Proposed Emission Unit

This project is for after-the-fact construction of the existing Honeycomb Company of America, Inc., aerospace products and parts manufacturing facility. This project is also for modifications to the existing facility that will increase the production capacity and emissions. The facility manufactures bonded metal-to-metal, metal-to-honeycomb and honeycomb to epoxy-composite assemblies for military aircraft.

The existing manufacturing operation includes two paint booths, one primer application booth, a saw room, a small exempt self-enclosed sandblasting unit, two small exempt boilers and three exempt propane fired emergency generators. The paint and primer booth operations are sources of volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions.

Modifications to the existing facility will involve moving painting operations to two new paint booths located in a different building. The old paint booths will then be used for sanding operations. Two new primer booths will also be installed as well as a dust booth. The modifications will result in an increase in VOC and HAP emissions.

This project will create the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Aircraft Parts Manufacturing Operations

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Sources/Activities

- One small self-enclosed sandblasting unit.
  [Rule 62-4.040(1)(b), F.A.C. – insignificant emissions]
- One 891 ft^2 saw room. Particulate matter generated in this room is routed through a small dust collector which exhausts back into the same room.
  [Rule 62-4.040(1)(b), F.A.C. – insignificant emissions]
- Two future sanding booths (currently the paint booths). Particulate matter emissions will be exhausted to the outdoors after being controlled by fiber filters with a 98% or higher dust collection efficiency.
  [Rule 62-210.300(3)(b), F.A.C. – Generic and Temporary Exemptions]
- One future dust booth to be located in the proposed new final prep area. Air inside the dust booth will be re-circulated using a dust collection system comprised of 36 ultra-efficiency nanofiber cartridge filters from Filter 1 with a Minimum Efficiency Reporting Value (MERV) rating of 15 (greater than 95% dust spot efficiency).
  [Rule 62-4.040(1)(b), F.A.C. – insignificant emissions]
- One Cleaver Brooks boiler with a maximum design heat input rate of 9.9 MMBtu/hour. It is fired only on natural gas and burns a maximum of 93.25 million ft^3 per year
  [Rule 62-210.300(3)(a) 34., F.A.C. Categorical and Conditional Exemptions – Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity less than 100 MMBtu/hour]

- One Williams & Davis boiler with a maximum design heat input rate of 12.6 MMBtu/hour. It is fired only on natural gas and burns a maximum of 118.68 million ft^3 per year.
  [Rule 62-210.300(3)(a) 34., F.A.C., Categorical and Conditional Exemptions – Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity less than 100 MMBtu/hour]
- One Wisconsin Oven Corporation gas oven with a maximum heat input rate of 0.55 MMBtu/hour. It is fired only on natural gas and burns a maximum of 5.18 million ft^3 per year.
  [Rule 62-210.300(3)(a) 34., F.A.C., Categorical and Conditional Exemptions – Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity less than 100 MMBtu/hour]
- One 26.8 HP Generac QT020 propane-fired emergency generator manufactured after 6/12/06.
  [Rule 62-210.300(3)(a)35., F.A.C., Categorical and Conditional Exemptions – Stationary Reciprocating Internal Combustion Engines]
- One 29.5 HP Generac QT022 propane-fired emergency generator manufactured after 6/12/06.
  [Rule 62-210.300(3)(a)35., F.A.C., Categorical and Conditional Exemptions – Stationary Reciprocating Internal Combustion Engines]
- One 40.2 HP Generac QT030 propane-fired emergency generator manufactured after 6/12/06.
  [Rule 62-210.300(3)(a)35., F.A.C., Categorical and Conditional Exemptions - Stationary Reciprocating Internal Combustion Engines]

The Williams & Davis boiler listed above is subject to 40 CFR 60, Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

The propane-fired emergency generators listed above are subject to 40 CFR 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

Exemptions under Rule 62-4.040(1)(b), F.A.C. (insignificant emissions), may be revoked if the installation is substantially modified or the basis for the exemption is determined to be materially incorrect.

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.

Federal NESHAP Applicability Note: This facility is subject to 40 CFR 63 Subpart HHHHHH (National Emissions Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources) because it uses coatings containing one of the target HAPs, chromium (Cr). The permittee shall comply with all of the applicable provisions of this subpart. As of the effective date of this permit, this rule has not been adopted by the State of Florida.

PERMIT HISTORY/AFFECTED PERMITS

This permit is the initial after-the-fact construction permit for this facility.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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 email 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 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.]

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. Application for Non-Title V Air Operation Permit - This permit authorizes construction of the permitted emissions unit and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions units. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

a. 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/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

c. copies of the most recent two months of records/logs specified in Specific Condition No. A.5.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030 and 62-4.050, F.A.C.]

A. EU No. 001 – Aircraft Parts Manufacturing Operations

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

EU ID No.	Emissions Unit Description
001	Aircraft Parts Manufacturing Operations – This emissions unit currently consists of two paint booths and one primer booth manufactured by Honeycomb Company of America, Inc. (HCOA). Paint and primer overspray emissions are controlled by fiber filters before being exhausted outside the building. This construction permit allows for the construction of a series of three connected units from Standard Tools that include a crossflow spray booth on either side of a non-ventilated drying enclosure. Overspray emissions will be controlled by dry arrestor exhaust filters that have been certified for capturing 98.7% of overspray materials. VOC and HAP emissions will exhaust through a 34" diameter pipe through the roof of the building. Two new primer booths will also be constructed. Primer Booths 1 & 2 will each have individual exhaust stacks. The booths may be combined into one large booth having the same two exhaust points. After the new paint booths are in operation the old paint booths will be used for sanding operations where a rotary/orbital sander will be used as needed. A new dust booth will be installed where manufactured parts are cleaned of excess flashing. Air inside the dust booth will be re-circulated using a dust collection system comprised of 36 ultra-efficiency nanofiber cartridge filters from Filter 1 with a Minimum Efficiency Reporting Value (MERV) rating of 15 (greater than 95% dust spot efficiency). Manufacturing begins with raw metal sheets that are cut into different shapes, heat treated, and bonded with other metal sheet shapes and honeycomb core. The composite pieces are coated with corrosion inhibiting chemicals and painted. Following are the major operations in the process: Shearing – Aluminum sheet metals are sized using electric and pneumatic shear machines. Heat Treatment – Sheet metals are heated to high temperatures to achieve a desired material state in an electric batch oven. The sheet metals are then quenched by rapidly submerging them into a tank of water. Forming and Processing - Hydraulic presses are used to form sheet metal and honeycomb core into various shapes. Afterwards, straight cuts are made using band saws and hand cutting blades. Fugitive dusts are produced as a result of this process. These emissions occur inside the core manufacturing area and are controlled by the building enclosure. Chemical Milling or Industrial Etching - Baths of temperature-regulated corrosive etching chemicals are used to remove material from metals to create an object with the desired size and shape. The solutions used in the processing tanks contain VOC and HAPs which are emitted fugitively. Chemical Surface Preparation – Aluminum parts are processed through a series of chemical tanks containing alkaline, phosphoric acid, and rinse water which create a clean surface. The solutions used in the processing tanks contain VOC and HAPs which are emitted fugitively. Machining – Aluminum plates, blocks and sheets are machined using manual milling machines. Drill presses, hand drills, hand deburr tools and automatic riveters are used to drill and assemble desired parts. Fugitive dusts are created in this process and are controlled by the building enclosure. Layup – Assemblies are prepared for bonding by applying adhesives between layers of any combination of metal, pre-impregnated fiberglass, and honeycomb core. Fugitive VOC and

	HAP emissions are associated with adhesive use. Bonding – Fiberglass, metal-to-metal, carbon fiber and honeycomb core bonding is conducted in autoclaves or presses. Steam provided by two exempt natural gas-fired boilers is used to heat the autoclaves. Chemical Coating – Aluminum parts and assemblies are sprayed with a solution to inhibit corrosion and protect exposed metal surfaces. The solution is applied by operators using a hand-help wand and reservoir tank. Shop air is used to dry the parts. Fugitive VOC and HAP emissions are associated with the applied solution. Spray Application Coating – Currently all spray applications occur inside two paint booths and one primer booth and include the following operations: Adhesive Primer – Adhesive primer is applied to metal surfaces using a high volume low pressure (HVLP) spray gun. After parts air dry they are sent to a gas oven for further drying and curing. Paint Primer/Topcoat – Paint primer and topcoat are applied through a HVLP spray gun. The parts are placed in a drying booth, heated by steam dryers. Methyl Ethyl Ketone (MEK) – Parts are sent to a core cleaning room and sprayed with non-recirculated MEK using an HVLP spray gun. After the modification of the existing facility is complete, all spray applications will occur inside two new paint booths and two primer booths (HCOA may construct one large primer booth same size as the two primer booths combined). The operations described above will remain the same. VOC and HAP emissions are associated with the spray application processes. The paint booths are maintained under negative pressure and exhaust air is controlled by filter media with an efficiency to control more than 98% of the paint mist. After parts are treated and painted they proceed to final inspection and subsequent shipping.

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.]

A.2. Paint and Primer Spray Booths Overspray Filters - The permittee shall not circumvent any paint or primer spray booth air pollution control equipment (fiber filters) or allow the emissions of air pollutants without this equipment operating properly. In order to provide reasonable assurance the overspray control systems are adequately controlling emissions of uncontrolled particulate matter from the spray booths, visible emissions from the spray booth exhausts should not exceed 5% opacity. Exceedance of the 5% limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices (filter maintenance or replacement) may be necessary.
[Rules 62-4.070(3), and 62-210.650, F.A.C.]

A.3. Volatile Organic Compound Emissions and/or Organic Solvent 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. The following procedures shall be utilized to minimize pollutant emissions:

a. all equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials;

b. tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use;

c. immediately confine and clean up VOC and/or solvent spills, and make sure wastes are placed in closed containers for reuse, recycling or proper disposal; and

d. used cleanup solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations.

[Rules 62-4.070(3) and 62-296.320(1), F.A.C.]

EMISSIONS STANDARDS

A.4. Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emission Limitations – Facility-wide emissions of VOC, Total HAPs and any individual HAP shall not exceed the following:

Pollutant	Emission Limitation (tons per year)
VOC	24.0
Any Individual HAP	8.0
Total HAPs	10.0

[Rule 62-210.200 F.A.C. ("Potential to Emit"); requested by applicant in permit application received December 1, 2014]

RECORDKEEPING REQUIREMENTS

A.5. Monthly Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Recordkeeping Requirements - In order to document compliance with the VOC and HAP emissions limitations of Specific Condition No. A.4., the permittee shall maintain monthly records. These records may be based on the beginning and ending inventories, deliveries, shipments, etc. At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC and HAP emissions, provided that no materials are used which are not purchased. The monthly records shall include, but not be limited to, the following information:

a. facility name, facility ID No., emissions unit ID No., and description (i.e., Honeycomb Company of America, Inc., 0810246, EU 001, Aircraft Parts Manufacturing Operations);

b. month, year, and method used for records (usage or purchase);

c. identity and quantity (gallons) of **every** solvent, primer, adhesive, paint, and any other material that contains VOC and/or HAPs used during the month;

d. VOC and individual HAP content (lbs./gallon) for each material listed in A.5.c. above;

e. calculated monthly total of VOC, individual HAP and total HAP emissions, (pounds or tons/month) based A.5.c. and d. above; and

f. cumulative total of VOC, individual HAP and total HAP emissions for the most recent consecutive 12-month period (tons/consecutive 12-month period).

Supporting documentation (SDS sheets, purchase orders, U.S. EPA "VOC DATA SHEETS", etc.) that includes sufficient information to determine VOC and HAP emissions shall be kept for each paint, coating, thinner, solvent, and other material used in the aircraft parts manufacturing operations.

The records shall be maintained at the facility for at least 3 years and made available to the Compliance Authority upon request. The records shall be completed by the end of the following month. These records may be maintained in either a hardcopy or electronic format.

[Rules 62-4.070(3) and 62-4.160, F.A.C.]