



Florida Department of Environmental Protection

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

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FINAL PERMIT

PERMITTEE

Goodrich Interiors
3414 S. 5th Street
Phoenix, AZ 85040-1169

Authorized Representative:
Mr. James Erickson, Vice President Evacuation
Systems

Air Permit No. 0270022-002-AO
Permit Expires: 10/31/2017
Site Name: Winslow Marine Products
Corporation
Minor Air Operation Permit
Project Name: Initial Operation Permit

This is the initial operation permit for a marine and aviation life raft and float manufacturing and repair facility at Winslow Marine Products Corporation (Standard Industrial Classification No. 3069). The facility is located in DeSoto County at 11700 SW Winslow Drive in Lake Suzy, Florida. The UTM coordinates are Zone 17, 397.28 km East, and 2991.57 km North.

This final permit is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements and Facility-wide Specific Conditions
- 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 proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 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 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address, and telephone 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 the petitioner received notice of the agency 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 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 Department'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 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department 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 10/31/12
Kelley M. Boatwright Effective Date
District Air 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 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.

James Erickson, Vice President Evacuation Systems
Goodrich Interiors
jim.erickson@utas.utc.com

Karen Mittleider, EHS Project Lead
Goodrich Interiors
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Robert Fox, P.E.
Environmental Resources Management
Bob.fox@erm.com

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.

Carol S. Moore 10/31/12
(Clerk) (Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is a marine and aviation life raft and float manufacturing and repair facility. The existing facility consists of the following emissions unit.

Facility ID No. 0270022	
ID No.	Emission Unit Description
001	Life Raft and Float Manufacturing and Repair

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

Exempt Emission Units/Activities

Surface coating operations are exempt since paint and solvent/thinner usage will be less than 2 gallons per day.

[Rule 62-210.300(3)(a)(27), F.A.C.]

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 synthetic non-Title V source for the pollutants volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

Initial Operation Permit and incorporates the terms and conditions of Construction Permit No. 0270022-001-AC.

**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's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

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. 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"

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

(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 the operation permit. To properly apply for an 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 month of records/logs specified in Specific Condition Nos. A.3. and A.4.

[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.]

FACILITY-WIDE SPECIFIC CONDITIONS

9. Volatile Organic Compounds (VOC) and Organic Solvents (OS) Emissions - In addition to Condition 6. of Appendix C., the permittee shall comply with the following:

- 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. keep applicators (brushes, rags, etc) in closed containers when not being used;
- d. all fittings, valve lines, etc., shall be properly maintained;
- e. all VOC/OS spills shall be attended to in a timely manner and the waste properly disposed of, recycled, etc.;
- f. all solvent from solvent washings (equipment clean-up) shall be directed into containers that prevent evaporation to the atmosphere.

[Rules 62-4.070(3) and 62-296.320(1), F.A.C.; Construction Permit No. 0270022-001-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 - Life Raft and Float Manufacturing and Repair

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	<p>Fabric used to manufacture the life rafts or floats arrives at the facility in rolls. Pieces of fabric are cut using a computer controlled cutting machine. Assembly is performed by hand using catalytic adhesive to join the cut pieces of fabric. The catalysts, adhesives and clean-up solvents contain volatile organic compounds (VOC) and hazardous air pollutants (HAPs). Fugitive VOC and HAP emissions are controlled by keeping raw materials and applicators (brushes, rags) in covered containers. After the basic life raft or float is assembled, various straps, pockets, signage and other accessories are added. Some of the assemblies may be cured in an electric oven to strengthen the seams. Each life raft or float is then inflated and pressure tested. Final fittings and survival equipment are then attached, as applicable. The air in the life raft or float is evacuated and it is folded for packing. The life rafts and floats are shipped to customers worldwide.</p> <p>A small amount of VOC is also emitted in the bottle shop from the IPA used in a small parts washer. This facility does not use solvents that would be regulated under 40 CFR 63, Subpart T - National Air Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning.</p> <p>Life rafts, floats and evacuation slides are serviced in a separate section of the building. Smaller amounts of adhesive and solvent are used as well as touch up paint.</p>

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation - The hours of operation are not limited (8760 hours per year).

[Rules 62-4.070(3) and 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 0270022-001-AC]

EMISSIONS STANDARDS

A.2. Emission Limitations - The emissions from life raft and float manufacturing and repair operations shall not exceed the following:

Pollutant	Tons per any consecutive 12-month period
Volatile Organic Compounds (VOC)	35.0
Any Individual Hazardous Air Pollutant (HAP)	8.0
Total HAPs	21.0

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 0270022-001-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 - Life Raft and Float Manufacturing and Repair

RECORDS AND REPORTS

A.3. VOC Recordkeeping Requirements - In order to document compliance with Specific Condition A.2., the following monthly records shall be kept:

- a. facility Name, Facility ID No. (0270022), Emission Unit No. (001);
- b. month/year;
- c. total quantity (gallons) and VOC content (lbs/gallon) of each VOC containing material used for the month;
- d. calculated monthly total VOC emissions, in pounds per month (based upon material VOC content); and
- e. cumulative total of the VOC emissions for the most recent consecutive 12-month period (tons per consecutive 12-month period).

The records 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 shall be completed by the 15th of the following month.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0270022-001-AC]

A.4. HAP Recordkeeping Requirements - In order to document compliance with Specific Condition A.2., the following monthly records shall be kept:

- a. facility Name, Facility ID No. (0270022), Emission Unit No. (001);
- b. month/year;
- c. total quantity (gallons) and HAP content (lbs./gallon) of each HAP containing material used for the month;
- d. calculated monthly emissions for each individual HAP in pounds or tons per month (based upon material HAP content);
- e. calculated monthly emissions for total HAPs in pounds or tons per month (based on d. above);
- f. cumulative total emissions for each individual HAP for the most recent consecutive 12-month period (tons per consecutive 12-month period); and
- g. cumulative total of all HAP emissions for the most recent consecutive 12-month period (tons per consecutive 12-month period).

The records 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 shall be completed by the 15th of the following month.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0270022-001-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 - Life Raft and Float Manufacturing and Repair

A.5. Documentation - Supporting documentation (e.g., MSD sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for the records required by Specific Condition Nos. A.3 and A.4, which includes sufficient information to determine VOC and HAP emissions, shall also be kept. At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC/HAP emissions, provided that no materials are used which are not purchased. Documentation of solvents consumed may use a mass-balance method to determine usage (amount used minus amount collected for disposal or recycle).

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