FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southeast District Office
400 North Congress Avenue, 3rd Floor
West Palm Beach, Florida 33401
561-681-6600

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

FEDERALLY ENFORCEABLE STATE AIR OPERATION PERMIT

Sent by Electronic Mail – Received Receipt Requested
chris.see@piper.com

PERMITTEE:

Piper Aircraft Inc.
2926 Piper Drive
Vero Beach, FL 32960-1954

Permit No.: 0610023-007-AF
Issued: September XX, 2013
Expires: September XX, 2018
Site Name: Piper Aircraft, Inc.
Minor Source Air Federally Enforceable State Operating Permit (FESOP)
Project Name: FESOP Renewal
A renewal application must be submitted by: July XX, 2018

Authorized Facility Contact:
Mr. Chris See, Senior Industrial Engineer

LOCATED AT: 2926 Piper Drive in Vero Beach, Florida 32960-1954

PROJECT DESCRIPTION: FESOP Renewal for the Piper Aircraft Inc. aircraft manufacturing facility.
SIC: Aircraft (SIC # 3721)
NAIC: Aircraft Manufacturing (NAIC # 336411)
UTM/ Lat-Long: Zone 17; 557.56 km. E; 3058.43.01 km. N / Lat. 27° 38' 55.4023" N Long 80° 24' 59.4220" W

This final permit is organized by the following sections:

Section 1. General Information
Section 2. Administrative Requirements
Section 3 Facility-wide and Emissions Unit Specific Conditions
Section 4 Appendices

Because of 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 other 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 of 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 West Palm Beach, Florida

_____ _____

Joe Lurix Date
Southeast District
Air Program Administrator

JL /lh /sdt

CERTIFICATE OF SERVICE

The undersigned duly designated agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) was sent by electronic mail (with received receipt) before the close of business on _____ to the permittee.

Mr. Chris See, Senior Industrial Engineer, Piper Aircraft: chris.see@piper.com

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of these documents were sent by electronic mail (with received receipt) on the same date to the following persons:

Mr. Aaron J. Bowles, P.E. MBV Engineering, Inc.: aaronb@mbveng.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.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Piper Aircraft, Inc.

Piper Aircraft is a general aviation manufacturing facility. The facility operates a wide variety of fabrication, assembly, paint and inspection processes. The facility includes three (3) steam boilers, two (2) hot water heaters, seven (7) paint booths (two paint booths were recently replaced with new downdraft paint booths under construction permit 0610023-006-AC), two (2) trim booths, a plastic booth, an aluminum cleaning and tech line, and an acid tank #5. Particulate emissions from the paint, trim, and plastics booths are controlled by dry filters. Two of the steam boilers have the same manufacturer and model number (Manufacturer: Cleaver Brooks, model number CB552-200). The other steam boiler is manufactured by Trane, model number FTBB 314D-4A-SO15-IC. The two hot water heaters have the same manufacturer and model number (Manufacturer: Trane, model number FTBB 3190-4A-W100-GP).

The existing facility consists of the following emissions units.

Facility ID No. 0610023	
ID No.	Emission Unit Description
009	Aluminum Cleaning & Etch Line, Aluminum Scrubber, and Acid Etch Tank No. 5
012	(7) Paint Booths/ (2) Trim Booths/ (1) Plastics Booth
013	(2) Hot Water Heaters/ (3) Steam Boilers

Project Description

The purpose of this project is to modify Air FESOP No. 0610023-005-AF to include the two new downdraft paint booths of EU012 that were replaced under air construction permit No. 0610023-006-AC.

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 (HAP).
- 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 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.

[Permitting Note: At this time, the State of Florida has not adopted 40 CFR Part 63, Subpart HHHHHH – NESHAP, Painting Stripping and Miscellaneous Surface Coating at Area Sources and the rule requirements are not incorporated into this air permit. However, EPA still requires the facility to demonstrate compliance with the requirements. All required reports pertaining to this rule should be submitted to EPA.]

PERMIT HISTORY/AFFECTED PERMITS

Replaces Permit No. 0610023-005-AF

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Southeast District Air Resource Management Section. The Southeast District's mailing address and phone number is:

Florida Department of Environmental Protection
Southeast District Office
Air Resource Management Section
400 North Congress Avenue, 3rd Floor,
West Palm Beach, Florida, 33401-2913,
(Phone 561-681-6600 Fax 561-681-6755)

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 Southeast District Air Resource Management Section (see above mailing address and phone number).
3. Appendices: The following Appendices are attached as part of the 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, 62-313, 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 additional 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.
   [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 compliance test reports required by Specific Condition No. **A.7**, if not previously submitted.
[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.]

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
009	Aluminum Cleaning & Etch Line, Aluminum Scrubber, and Acid Etch Tank No. 5 – Sulfuric acid emissions from the etch line are controlled by an acid vapor scrubber.
012	(7) Paint Booths/ (2) Trim Booths/ (1) Plastic Booth – Particulate emissions from the paint, trim, and plastics booths are controlled by dry filters.
013	(2) Hot Water Heaters/ (3) Steam Boilers – Hot water heaters and steam boiler No. 1 are located in Building 9 and steam boilers Nos. 2 and 3 are located in Building 1.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum annual heat input rates are as follows:

Emissions Unit	Maximum Heat Input (MMBTU per any consecutive 12-month period)
Steam Boiler No. 1 (Bldg. 9)	32,141
Steam Boiler No. 2 (Bldg. 1)	73,409
Steam Boiler No. 3 (Bldg. 1)	73,409
Hot Water Heater No. 1 (Bldg. 9)	80,640
Hot Water Heater No. 2 (Bldg.9)	80,640

[Rule 62-210.200(PTE), F.A.C.]

A.2. Authorized Fuel: Steam Boilers No. 2 and 3 (Bldg.1) are allowed to fire natural gas, propane, or new No. 2 fuel oil only. [Rule 62-210.200(PTE), F.A.C.]

A.3. Authorized Fuel: Steam Boiler No. 1 (Bldg. 9) and Hot Water Heaters No. 1 and 2 (Bldg. 9) are allowed to fire new No. 5 fuel oil only. [Rule 62-210.200(PTE), F.A.C.]

A.4. Restricted Operation: The hours of operation are not limited (8,760 hours per year). [Permit Application dated December 1, 2011; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.5. Restricted Operation: The plane production is limited to 450 planes processed per consecutive twelve months period. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.6. General Visible Emissions Limitation: The visible emissions for each source are limited to less than 20% opacity. [Rule 62-296.320(4)(b)1., F.A.C.]

A.7. SO2/VOC/HAP Emissions Limitations: The emissions allowed for the facility are limited to the following:

Pollutant	Emissions Limitations (tons per any consecutive 12-month period)
SO2	Less than 99.0
Total VOC	Less than 99.0
Total HAPs	Less than 25.0
Any single HAP	Less than 10.0

[Rule 62-210.200(203), (PTE), F.A.C.]

TESTING REQUIREMENTS

A.8. Compliance Tests: Each paint booth shall be tested to demonstrate compliance with the emissions standards for visible emissions, specified in Specific Condition No. **A.6.**, at least 90 days prior to permit expiration date. [Rules 62-4.070(3) and 62-297.310(7)(a)1., F.A.C.]

A.9. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310, F.A.C.]

A.10. Test Method: Required tests shall be performed in accordance with the following reference method.

EPA Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources The test shall last thirty minutes or the length of the batch/cycle

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62.297.100, F.A.C.; Appendix A of 40 CFR 60]

A.11. Fuel Analysis Requirements: The permittee shall demonstrate compliance with the liquid fuel sulfur limit by the vendor providing a fuel analysis upon each fuel delivery.
[Rules 62-213.440, 62-296.406(3), F.A.C.]

A.12. Fuel Sulfur Content: The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using one of ASTM D2622-94, ASTM D4294-90(95), ASTM 1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 or latest editions.
Rules 62-213.440, 62-296.406(3) and 62-297.440, F.A.C.]

NOTIFICATION REQUIREMENTS

A.13. Test Notification: The permittee shall notify the Compliance Authority, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time and place of each such test, and the test contact person who will be responsible for coordinating and having such test contucted for the permittee. [Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

A.14. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

A.15. Monthly Recordkeeping Requirement: In order to demonstrate compliance with Specific Conditions Nos. **A.1., A.2., A.3., A.5.**, and **A.7.**, the permittee shall maintain a monthly log at the facility for a period of at least five (5) years from the date the data is recorded or five (5) years after the submittal of any emission report in which the data is used. The log, at a minimum, shall contain the following:

Monthly

a. Designation of the month and year of operation for which the records are being tabulated;
b. Consecutive 12-months total of SO2, total VOC, total HAPs and individual HAPs;
c. Consecutive 12-months total of fuel usage and sulfur content;
d. Fuel analysis records in accordance with General Condition 14.c (Appendix B);
e. Monthly total of planes processed; and
f. Consecutive 12-months total of planes processed.

[Rule 62-4.070(3), and 62-210.370(2)(h) F.A.C.]

Note: A consecutive 12-months 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-months total treats each month of the year as the end of a 12-months period. A 12-months 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 are available until such a time as a consecutive 12-months total can be maintained each month.

A.16. Supporting Documentation: Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. The records shall be made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). [Rule 62-4.070(3), F.A.C.]

A.17. Additional Recordkeeping Requirements: Records specified in Specific Condition No. **A.15.** above, must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those used to derive emissions, must be clearly documented, and may be presented in the form of a template of sample calculations and available for review on site by the Department. [Rule 62-4.070(3), F.A.C.]