

December 19, 2016

Sent Via E-mail: robinson@coj.net; tkilbour@coj.net

City of Jacksonville
Neighborhoods Department – EQD
Jacksonville, FL

Attention: Mr. Richard Robinson & Ms. Tree Kilbourn

**RE: Response - Cease and Desist Citation AP-16-05DEP
Air Permit No. 0310602-002-AF**

Dear Mr. Robinson and Ms. Kilbourn,

Flightstar Aircraft Services has temporarily ceased (locked and tagged) the coating spray booth permitted in the above referenced permit.

Our review of the citation and permit included the assistance of Douglas Bauman, Professional Engineer with General Civil & Environmental Engineering, whom completed the air operating permit application. Mr. Bauman services several aerospace companies in Florida and elsewhere, some having SIC 3721 and others having 4581.

FAC 62-296.513(2)(a)2 mentioned does not apply to Flightstar Aircraft Services Hangar 935 operations, nor does it apply to any other of Flightstar Aircraft Services operations at Cecil Field. Hangar 935 is a full-service aircraft maintenance hangar, performing primarily maintenance, repair (on a non-factory basis) and case-by-case infrequent overhauls of aircraft. Our website's startup video at <http://www.flightstarijax.com> is a good representation of Flightstar Aircraft Services primary operations. We are not in the business of manufacturing aircraft parts.

The SIC code for Flightstar Aircraft Services operations is SIC 4581, as listed on page 7 of the air operating permit application and is the correct SIC for our operations (please see attached Exhibit I for descriptions of various SIC codes under 4581).

Unless very familiar with the aerospace industry, an individual may mistakenly use for SIC 3721 for an aircraft service and repair facility at an airport. However, SIC 3721 would be for facilities like Lockheed Martin Aeronautics Company at 9300 28th Street North, Pinellas Park, FL or Spirit Aerosystems in Wichita, KS (see aircraft nose cone assembly manufacturing pictures on <http://www.spiritaero.com/>), aerospace parts manufacturing facilities where metal aircraft parts are fabricated in sub assembly lines/areas, then often chemically treated and then painted, again often in manufacturing line/area-type setups. Manufactured metal aircraft parts from these types of facilities (SIC 3721) are then for sale and/or used on a larger scale for aircraft undergoing many of the same upgrades, retrofits, modifications or overhauls.

On more extensive repair jobs or case-by-case infrequent overhauls of aircraft at Flightstar Aircraft Services, existing aircraft parts are reworked and painted, or new aircraft parts are purchased from outside manufacturer/distributor. On occasion, a metal aircraft part may need to be modified or fabricated in support of the principal repair or overhaul job; however, part fabrication is done on an as-needed basis and not on a factory-type basis listed in SIC 3721. As stated on page 5 of the air operating permit application, "the paint booth is used to resurface and repair parts in support of the principal hanger activities, maintenance, repair and overhaul (MRO) of aircraft."

Please note the air operating permit application associated with Flightstar Aircraft Services Hangar 935 operations correctly did not list FAC 62-296.513(2)(a)2 under the Rule Applicability Analysis on page 8. As FAC 62-296.513(2)(a)2 does not apply to Flightstar Aircraft Services Hangar 935 operations, we respectfully request item # 6 under Emission Limitations & Standards on page 6 of air permit 0310602-002-AF be removed and that the Cease and Cease and Desist Citation AP-16-05DEP be withdrawn.

Thank you in advance for your attention to this matter.

Respectfully submitted,

Justin Collins

Justin W. Collins

Environmental, Health and Safety Manager
Flightstar Aircraft Services, LLC
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Jacksonville, FL 32221
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Mobile: (904) 614-0877

Attached: Exhibit I – SIC 4581 Description

cc: Stephanie Burch – City of Jacksonville
Mike Williams - EQD
Douglas Bauman, MScE, P.E. - GCEE

EXHIBIT I

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 - [SIC to NAICS Conversion](#)
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SIC Code 4581 Airports, Flying Fields, and Airport Terminal Services

Description

Establishments primarily engaged in operating and maintaining airports and flying fields; in servicing, repairing (except on a factory basis), maintaining, and storing aircraft; and in furnishing coordinated handling services for airfreight or passengers at airports. This industry also includes private establishments primarily engaged in air traffic control operations.

Cross References

Government air traffic control operations are classified in Public Administration, Industry 9621. Aircraft modification centers and establishments primarily engaged in factory type overhaul of aircraft are classified in Manufacturing, Major Group 37, and flying fields maintained by aviation clubs are classified in Services, Industry 7997.

Illustrative Examples

- Air traffic control, Aircraft cleaning and janitorial service, Aircraft servicing and repairing, Aircraft storage at airports, Aircraft upholstery repair, Airfreight handling at airports, Airport hangar rental, Airport leasing
- if operating airport, Airport terminal services, Airports Flying fields, Hangar operation

Top Companies

- Ted Stevens Anchorage International-Anc
- Cincinnati International Airport
- Philadelphia International Airport
- Portland International Airport
- Austin Bergstrom International Airport
- Albuquerque International Sunport
- Phoenix Aviation Department
- Duncan Aviation Inc
- Chicago O'Hare International Airport
- Newark Liberty International Airport

Further Classification

6-digit SIC

- 458101Aircraft Ground Support & Service Equip
- 458102Aircraft Engines-servicing & Maintenance
- 458103Aircraft Ferrying & Transporting Svc
- 458104Aircraft Servicing & Maintenance
- 458105Aircraft Storage
- 458106Airports
- 458107Aircraft Upholsterers
- 458108Helicopter-servicing & Maintenance
- 458109Air Traffic Control Tower
- 458110Aircraft Refinishing & Painting
- 458111Airline Support Services
- 458112Aircraft Hangars-rental & Sales
- 458113Aircraft Washing & Polishing
- 458114Aircraft Support Services
- 458115Airport Authority & Terminal Svcs
- 458116Aircraft-restore & Customize

7-digit SIC

- 4581001Airports, Flying Fields & Airport Terminals
- 4581002Airports
- 4581003Aircraft Servicing & Maintenance
- 4581004Aircraft Servicing & Repairing
- 4581005Aircraft Cleaning & Janitorial Services
- 4581006Airport Terminal Services
- 4581007Air Freight Handling At Airports
- 4581008Airport Hangar Rental
- 4581009Hangars & Other Aircraft Storage Facilities

- 4581010Hangar Operation
- 4581011Aircraft Storage
- 4581012Aircraft Upholstery Repair
- 4581013Airfreight
- 4581014Airports & Flying Fields
- 4581015Aircraft Ground Support & Services Equip
- 4581016Aircraft Engines-servicing & Maintenance
- 4581017Flying Field (except Those Maintained By Clubs)
- 4581018Aircraft Ferrying & Transporting Services
- 4581019Military Flying Field
- 4581020Airport Control Tower Operation (except Government)
- 4581021Aircraft Upholsterers
- 4581022Helicopter-servicing & Maintenance
- 4581023Airport Leasing, If Operating Airport
- 4581024Air Traffic Control Tower
- 4581025Fixed Base Operator
- 4581026Aircraft Refinishing & Painting
- 4581027Airline Support Services
- 4581028Aircraft Hangars-rental & Sales
- 4581029Aircraft Washing & Polishing
- 4581030Aircraft Support Services
- 4581031Airport Authority & Terminal Services
- 4581032Aircraft-restore & Customize

8-digit SIC

- 45810000Airports, Flying Fields, And Services
- 45810100Hangars And Other Aircraft Storage Facilities
- 45810101Aircraft Storage At Airports
- 45810102Airport Hangar Rental
- 45810103Hangar Operation
- 45810200Aircraft Maintenance And Repair Services
- 45810201Aircraft Cleaning And Janitorial Service
- 45810202Aircraft Servicing And Repairing
- 45810203Aircraft Upholstery Repair
- 45810300Airports And Flying Fields
- 45810301Airport
- 45810302Flying Field, Except Those Maintained By Clubs
- 45810303Military Flying Field
- 45819901Air Freight Handling At Airports
- 45819902Airport Control Tower Operation, Except Government
- 45819903Airport Leasing, If Operating Airport
- 45819904Airport Terminal Services
- 45819905Airfreight Loading And Unloading Services
- 45819906Fixed Base Operator

Business Search by This Industry

Total Companies: **6221**

Est. Employment: **212322**

Hierarchy

40-49 - Transportation & Public Utilities

45 - Transportation by Air

[458 - Airports, Flying Fields, and Airport Terminal](#)

[4581 - Airports, Flying Fields, and Airport Terminal Services](#)

[Related NAICS Codes](#)

[488111 - Air Traffic Control](#)

[488119 - Other Airport Operations](#)

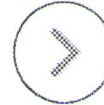
[488190 - Other Support Activities for Air Transportation](#)

[561720 - Janitorial Services](#)

[811420 - Reupholstery and Furniture Repair](#)

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