May 26, 2017

RECEIVED
JUN 06 2017
Environmental Quality Division

Mr. Harry Smith
City of Jacksonville
Environmental Quality Division
214 North Hogan Street, Suite 500
Jacksonville, Florida 32202

Subject: **Air Quality Construction Permit Application / The Boeing Company**
Cecil Airport, Jacksonville, Florida
Facility ID 0310607

Dear Mr. Smith:

The Boeing Company (Boeing) currently operates an aerospace rework operation at Cecil Airport[1] in Jacksonville, Florida. Boeing's operations include a variety of aviation rework and repair operations, primarily for the United States Department of Defense (DoD). The air quality related operations at this facility are permitted by the City of Jacksonville, Neighborhoods Department, Environmental Quality Division (EQD) by Air Operation Permit Number 0310607-002-AO.

As previously discussed with you (i.e., Mr. Harry Smith), Boeing is planning to make physical changes to the arrangement of their aerospace surface coating operations. These changes to the surface coating operations involve Emission Unit 001, *Aerospace Manufacturing and Rework Surface Coating Operations Involving Spray Application in Paint Booths/Hangers, Excluding Completed Aircraft*. These physical changes to the paint booths will not affect the overall emissions from the surface coating operations. That is, the surface coating emissions are related to the business needs at the facility, not the physical arrangement of the paint booths. The planned changes to the paint booths are expected to streamline operations and enhance product quality. No changes to the current 2.73 ton per year Volatile Organic Compounds (VOC) emission limit for EU 001 is requested as part of these changes.

You concluded that an air construction permit would be required to effect the preliminary planned changes. Hence, this letter, forms (Attachment 1), and supporting attachments are submitted as an air quality permit construction permit application. As discussed following, given the aggressive schedule for these changes, an expedited review and issuance of the construction permit is requested.

The need for an air quality construction permit was determined based on preliminary plans. We request the EQD to confirm that an air quality construction permit is indeed needed to effect these

[1] Cecil Airport is also referred to as Cecil Field and Cecil Commerce Center. The airport is owned by the Jacksonville Aviation Authority (JAA) and services a combination of military aircraft, corporate aircraft, general aviation, and air cargo.

changes. Please contact me or Mr. David Hunt of Boeing should there be an alternate approach to permitting, such as executing an administrative amendment to the operating permit.

This letter cover letter is organized in the following manner:

- Project Description;
- Schedule;
- Regulatory Review;
- Requested Permit Changes;
- Permit Application Fee; and,
- Closing.

Project Description

EU 001 is currently comprised of three paint spray booths or hangars:

1. Heated paint spray booth (Building 1823);
2. Non-heated paint spray booth (Building 1823); and,
3. Paint spray hangar (Building 312).

Currently, the heated paint spray booth in Building 1823 is used to perform the EU 001 surface coating operations. The non-heated spray booth in Building 1823 is dedicated to surface coating preparation, primarily involving manual sanding (i.e., hand or scuff sanding). The paint spray hangar in Building 312 is used for the surface coating of completed aircraft, which is considered part of EU 002.

This project involves a consolidation of surface coating operations in Building 312. The two booths in Building 1823 will be removed from service. A proposed layout of Building 312 after the completion of the proposed project is included in Attachment 3. The surface preparation will be performed in a new accordion style sanding booth located on the north side of building. As described in the regulatory applicability section of this letter, this booth is considered exempt from permitting.

A heated paint booth will be installed on the south side of the building. This paint booth will be a custom modular paint booth, manufactured by Panel Built, Inc. Manufacturer information regarding this booth is provided in Attachment 4. The planned booth dimensions are:

- Length = 31 feet;
- Width = 22 feet; and,
- Height = 9 feet.

Current plans are to use the existing air filtration bank and exhaust stack located on the south side of Building 312. This filtration bank provides an air flow rate of 12,000 actual cubic feet per minute (ACFM). The exhaust stack parameters are listed on the supporting permit application form (Attachment 1). The exhaust filters used will meet the 98 percent control efficiency of the applicable federal rule, 40 CFR 63 Subpart HHHHHH, *National Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* (Miscellaneous Surface Coating NESHAP).

At the time of the preparation of this air permit application, the detailed specifications for the paint booth heater are under development. The heater will be either electrically powered or natural gas fired. If the heater is natural gas fired, it will likely have a maximum heat input capacity of less than five million British thermal units per hour (MMBtu/hr). This maximum estimate is based on the current paint booth heater (Building 1823) rated at 1.375 MMBtu/hr. This unit, in combination with the facility steam boiler (rated at 2.5 MMBtu/hr) meet the permit exemption criteria of Florida Rule 62-210.300(3)(a):

> *33. Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity equal to or less than 10 million Btu per hour, provided all the following conditions are met with respect to each such unit.*
>
> > *a. The unit is not subject to the Acid Rain Program, CAIR Program, or any other unit-specific limitation or requirement.*
> >
> > *b. The rated heat input capacity of the unit is equal to or less than 10 million Btu per hour and, collectively, the total rated heat input capacity of all units claiming this exemption at the same facility is less than 10 million Btu per hour.*
> >
> > *c. The unit shall not burn used oil or any fuels other than natural gas or propane, except that fuel oil with a sulfur content not exceeding 1.0 percent by weight may be burned during periods of natural gas curtailment.*

The sanding booth is a source of particulate matter (PM) emissions. The PM emissions from the booth are expected to be considerably less than the 5 ton per year threshold of the generic permit exemption criteria of Florida Rule 62-210.300(3)(b):

> *1. Generic Emissions Unit or Activity Exemption. Except as otherwise provided at subsection 62-210.300(3), F.A.C., above, an emissions unit or pollutant-emitting activity that is not entitled to a categorical or conditional exemption pursuant to paragraph 62-210.300(3)(a), F.A.C., shall be exempt from any requirement to obtain an air construction permit or non-Title V air operation permit, or to use an air general permit pursuant to Rule 62-210.310, F.A.C., if it meets all of the following criteria.*
>
> > *a. It would not be subject to any unit-specific limitation or requirement.*
> >
> > *b. Its emissions, in combination with the emissions of other units and activities at the facility, would not cause the facility to emit or have the potential to emit any pollutant in such amount as to create a Title V source.*
> >
> > *c. It would neither emit nor have the potential to emit 500 pounds per year or more of lead and lead compounds expressed as lead, 1,000 pounds per year or more of any hazardous air pollutant, 2,500 pounds per year or more of total hazardous air pollutants, or **5.0 tons per year or more of any other regulated air pollutant** as defined at Rule 62-210.200, F.A.C.*
> >
> > *d. In the case of a proposed new emissions unit at an existing facility, the emissions of such unit, in combination with the emissions of any other proposed new or*

modified units and activities at the facility, would not result in a modification subject to the preconstruction review requirements of subparagraph 62-204.800(11)(d)2., Rule 62-212.400 or 62-212.500, F.A.C.

e. In the case of a proposed new pollutant-emitting activity, such activity would not constitute a modification of any existing non-exempt emissions unit at a non-Title V source or any existing non-insignificant emissions unit at a Title V source.

The potential PM emissions from the sanding booth are estimated as 0.14 tons per year. Details of these emission estimates are provided in Attachment 5. The main assumption for this estimate is the amount of paint removed is equal to the amount of paint solids applied associated with the potential VOC emission limit of 2.73 tons per year.

The two booths in Building 1823 are planned for decommissioning. That is, these booths will no longer be used after the startup of the booths in Building 312.

Completed aircraft will continue to be painted in Building 312. The sanding booth is of an accordion design, allowing for it to be extended when in use, and to be folded when additional room is needed. The painting of the completed QF-16 aircraft in planned to be performed in Building 312 in essentially the same manner as it is currently performed. The existing exhaust filtration banks on the north and south sides of the building will be used to provide the airflow during painting. The accordion style sanding booth will be in the folded configuration to allow the aircraft to fit in the hangar. Hence, no changes are associated with the painting of complete aircraft.

Schedule

Boeing would like to commence construction on the new paint booth on August 1, 2017. It is anticipated that construction will take less than one month. Commencement of operations is scheduled for September 1, 2017. Given this aggressive schedule, an expedited permit review and issuance is requested.

Regulatory Review

The relocation of the painting operations does not affect the overall regulatory applicability provided in the current operating permit or the underlying air quality permit applications. There are two main applicable regulatory requirements associated with the surface coating operations in EU 001:

1. VOC RACT Avoidance Limit of 2.73 tons per year; and,
2. Miscellaneous Surface Coating NESHAP.

The 2.73 ton per year Reasonably Available Control Technology (RACT) avoidance limit (EU 001 Condition Number 2) is in place to avoid the applicability of Rule 62-296.513, *Surface Coating of Miscellaneous Metal Parts and Products* (MMPP Surface Coating). This rule potentially applies in ozone maintenance areas, such as Duval County. This 2.73 ton per year VOC emission limit was put in place to avoid the MMPP Surface Coating rule applicability. As shown in the 12-month rolling total emission reports contained in Attachment 2, the current VOC emissions are slightly

less than 25 percent of this 2.73 ton per year limit. Hence, there is an ample margin of compliance with this limit.

The Miscellaneous Surface Coating NESHAP is a federal rule that is not adopted by the FDEP or the EQD. Hence, the provisions of this rule are not included in the air quality permit; however, remain applicable to Boeing's operations. This rule applies to facilities that use HAP based chemical paint stripping agents or spray apply coatings containing at least one of the following HAP constituents to plastic (e.g., composite) or metal substrates:

- Chromium (Cr);
- Lead (Pb);
- Manganese (Mn);
- Nickel (Ni); or,
- Cadmium (Cd).

Chromium was the only listed HAP material that was spray applied in EU 001 during the prior 12-months. Relatively small quantities of dichloromethane (also known as methylene chloride) were used in EU 002 as a paint stripping agent. The methylene chloride use is considerably less than the 1 ton per year threshold (i.e., approximately 5 percent of the threshold) that would impose additional requirements on the use of this paint stripping material. Boeing currently follows general workpractices associated with the use of the methylene chloride containing paint stripping material.

The main requirements of this rule as they apply to Boeing's operations are:

- Perform paint stripping in a manner that minimizes the use of methylene chloride (MeCl) based paint stripping agents;
- Implement a training program for painters covering:
  - Spray gun equipment selection;
  - Spray techniques;
  - Maintenance; and,
  - Environmental compliance.
- Install and operate filters that have at least 98 percent capture efficiency;
- Spray apply coatings in a booth with a full roof and at least three complete walls or side curtains;
- Use one of the following or equivalent application technologies:
  - High volume, low pressure (HVLP);
  - Electrostatic application; or,
  - Airless or air-assisted airless.
- Spray gun cleaning to avoid atomization of the solvent without collection in a container;
- Initial notification (applicability);
- Notification of compliance status (NOCS); and,
- Annual notification of changes of applicable requirements.

The facility is subject to this rule, and is considered an existing source as operations commenced prior to September 17, 2007. A combined initial notification (i.e., applicability) and Notice of

Compliance Status (NOCS) was submitted to the U.S. EPA in November 2014. A copy of this submittal was previously provided to the EQD.

Boeing achieves compliance with this rule by following Boeing internal environmental and training procedures, such as paint operation workpractices and periodic training. For example, Boeing has an on-line training course entitled *EHS Spray Coating 6H NESHAP (76008)* that is provided to painters at the Cecil Field facility.

The proposed paint booth will meet the requirements of this rule. For example, the booth has a full roof and at least three complete walls. The primary paint application technique will involve HVLP paint guns.

The reconfiguration of the paint booths at the facility, including the installation of the new paint booth, is not considered a change in the applicable requirements that would require an annual notification of changes per 40 CFR 63.11176(a).

Requested Permit Changes

Since the regulatory requirements associated with the new paint booth are the same as the existing paint booths, the only changes to the air permit involve the Emission Unit Description for EU 001. The following changes to this description are requested. This requested change is somewhat general in nature, allowing for Boeing to adjust the filters in use in Building 312. The requested changes are provided in Microsoft Word track changes mode.

> ***Aerospace Manufacturing and Rework Surface Coating Operations Involving Spray Application in Paint Booth(s)~~/Hangers~~, Excluding Complete Aircraft.*** *The heated Spray Paint Booth ~~and the Non-Heated Spray Paint Booth are~~is located in Building No. ~~1823~~312. The most common parts spray painted in the booth~~s~~ includes: tail hooks, ailerons (hinged flight control surfaces), flaps (inboard leading edges, outboard leading edges and trailing edges) stabilizers and wing panels. In addition, paint gun cleaning and hand wipe solvent cleaning (primarily final parts preparation that may occur in the paint booths prior to painting) are performed inside the paint booth~~s~~.*
>
> *Emissions from the heated paint booth ~~are~~ will be controlled by filters meeting the 98 percent particulate matter control efficiency requirement of ~~Exhaust Filter AF813 or Americure ACAN 3630 (1 Single Stage Filter), Intake Filter Americure ACAF7353, (8 Single Stage Filters), and a Burner Intake Reusable Washable Mesh (1 Filters).The non-heated paint booth emissions are controlled by a Tri Dim PPG 020020 40 Paint Collector Pad (20 Stage 1 Filters), Tri Dim 05402001 Tri-Dek #3/67 Self Sealing Panel Filter (20 Stage 2 Filters), Tri Dim A4109220 A3000, and Final Self Sealing Paint Collection Filter (20 Stage 3 Filters).~~*
>
> *~~The listed filter manufacturer and model numbers are typical, with changes allowed. Any replacement filter shall have a stated particulate matter efficiency of at least 98 percent as specified by~~ 40 CFR 63 Subpart HHHHHH, National Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.*

Although the plans for the paint booth are to utilize the existing exhaust system, it is possible that there may be some minor changes to optimize air flow balancing involving the overall building exhaust, paint booth heater, and the paint booth itself. At the time of the construction permit application preparation, the filter selection for the Building 312 is not finalized. It is requested that the EQD include in the typical air construction permit notification of operation commencement the identification of any changes in exhaust configuration from the information provided with this air quality permit application. In the event that a major change in the exhaust configuration (e.g., a doubling of exhaust volume) occurs, Boeing anticipates providing advance notice to the EQD of such changes.

Permit Application Fee

A construction permit application fee of $250 is included with this permit application. This fee was determined based on the rate provided in Rule 62-4.050(4)(a)(2)e., *Construction permit for an emission unit having potential emissions of less than 5 tons per year of each pollutant.*

Closing

Should you have any questions as you review this permit application and supporting documents, please contact me, Dr. Mitchell Hait, by telephone at (904) 494-4200, or by e-mail at haitinc@gmail.com. Alternately, you may also contact Mr. David Hunt of Boeing by telephone at (904) 317-2459, or by e-mail at david.m.hunt2@boeing.com. As previously noted, an expedited permit application review and issuance is requested to allow Boeing to meet their anticipated August 1, 2017 date for commencement of construction.

Sincerely,

Mitchell J. Hait, Ph.D., P.E.
President

Attachments:

1. FDEP Permit Application Forms
2. 12-Month Rolling Total Emission Reports
3. Building 312 – Proposed Layout
4. Panel Built, Inc. Paint Booth Supporting Information
5. Sanding Booth Emission Estimates
6. Permit Application Fee ($250)

ATTACHMENT 1

Attachment 1:

FDEP Permit Application Forms

Facility Form

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

RECEIVED
JUN 06 2017
Environmental Quality Division

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: **The Boeing Company**	
2. Site Name: **Cecil Airport**	
3. Facility Identification Number: **0310607**	
4. Facility Location... Street Address or Other Locator: **6211 Aviation Avenue, Building 1820** City: **Jacksonville** County: **Duval** Zip Code: **32221**	
5. Relocatable Facility? ☐ Yes ☑ No	6. Existing Title V Permitted Facility? ☐ Yes ☑ No

Application Contact

1. Application Contact Name: **Mr. David Hunt**
2. Application Contact Mailing Address... Organization/Firm: **The Boeing Company** Street Address: **6211 Aviation Avenue, Building 1820** City: **Jacksonville** State: **Florida** Zip Code: **32221**
3. Application Contact Telephone Numbers... Telephone: **(904) 317 - 2459** ext. Fax: **(904) 317 - 2414**
4. Application Contact E-mail Address: **david.m.hunt2@boeing.com**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- [✓] Air construction permit.
- [ ] Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- [ ] Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- [ ] Initial Title V air operation permit.
- [ ] Title V air operation permit revision.
- [ ] Title V air operation permit renewal.
- [ ] Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- [ ] Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- [ ] Air construction permit and Title V permit revision, incorporating the proposed project.
- [ ] Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- [ ] I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Please see cover letter and attachments for additional supporting information.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
EU001	Aerospace Manufacturing and Rework Surface Coating Operations Involving Spray Application in Paint Booths / Hangars, Excluding Exteriors of Completed Aircraft.	AC1F	$250

Application Processing Fee

Check one: ☑ Attached - Amount: $ 250 ☐ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : **Mr. Steve Waltman**

2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: **The Boeing Company**
   Street Address: **6211 Aviation Avenue, Building 1820**
   City: **Jacksonville** State: **Florida** Zip Code: **32221**

3. Owner/Authorized Representative Telephone Numbers...
   Telephone: **(904) 317 - 2631** ext. Fax: **(904) 317 - 2475**

4. Owner/Authorized Representative E-mail Address: **steve.waltman@boeing.com**

5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.

   Signature

   6/02/2017
   Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): ☐ For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. ☐ For a partnership or sole proprietorship, a general partner or the proprietor, respectively. ☐ For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. ☐ The designated representative at an Acid Rain source or CAIR source.
3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
5. Application Responsible Official E-mail Address:

APPLICATION INFORMATION

6. Application Responsible Official Certification:

I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

_____ _____

Signature Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **Mitchell Jay Hait**
   Registration Number: **52281**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Mitchell J. Hait, Ph.D., P.E., Inc.****
   Street Address: **786 Shell Street**
   City: **Satellite Beach** State: **Florida** Zip Code: **32937**
3. Professional Engineer Telephone Numbers...
   Telephone: **(904) 494 - 4200** ext. Fax: ( ) -
4. Professional Engineer E-mail Address: **haitinc@gmail.com**
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☑, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature 23 MAY 2017 Date

(seal)

* Attach any exception to certification statement. ****Florida Certificate of Authorization #28219**

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone **17** East (km) **415,184.3** North (km) **3,343,926.6**		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) **30/13/26.12** Longitude (DD/MM/SS) **81/52/52.91**	
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **37**	6. Facility SIC(s): **3721**
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: **Mr. David Hunt**
2. Facility Contact Mailing Address... Organization/Firm: **The Boeing Company** Street Address: **6211 Aviation Avenue, Building 1820** City: **Jacksonville** State: **Florida** Zip Code: **32221**
3. Facility Contact Telephone Numbers: Telephone: **(904) 317 - 2459** ext. Fax: **(904) 317 - 2414**
4. Facility Contact E-mail Address: **david.m.hunt2@boeing.com**

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official E-mail Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. ☐ Small Business Stationary Source	☐ Unknown
2. ☐ Synthetic Non-Title V Source	
3. ☐ Title V Source	
4. ☐ Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☑ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. ☐ Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. ☐ One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. ☑ One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	

12. Facility Regulatory Classifications Comment:

The facility has an emission limit of 2.73 tons per year for VOC emissions from EU 001, spray applied aerospace coatings excluding those applied to completed aircraft. This limit is to avoid applicability of the Miscellaneous Metal Parts and Products RACT Rule (62-296.513).

Two Part 63 NESHAPs apply to operations at this facility:

1. **Paint Stripping and Miscellaneous Surface Coating Operations (40 CFR 63 Subpart HHHHHH)**
2. **Reciprocating Internal Combustion Engines (RICE) (40 CFR 63 Subpart ZZZZ)**

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
VOC	**SM**	**Y**
H128	**B**	**N**

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
VOC	**N**	**EU001**		**2.73**	**ESCRACT**

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

The 2.73 ton per year VOC emission limit for EU 001 is requested to avoid applicability of Rule 62-296.513, Miscellaneous Metal Parts and Products RACT Rule. See cover letter for additional supporting information.

H128 is methylene chloride, which is subject to workpractice requirements to minimize emissions (40 CFR 63 Subpart HHHHHH).

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID: _____ ☑ Previously Submitted, Date: **Dec 2014**
2.	Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID: _____ ☑ Previously Submitted, Date: **Dec 2014**
3.	Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID: _____ ☑ Previously Submitted, Date: **Dec 2014**

Additional Requirements for Air Construction Permit Applications

1.	Area Map Showing Facility Location: ☐ Attached, Document ID: _____ ☑ Not Applicable (existing permitted facility)
2.	Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): ☑ Attached, Document ID: **Cover Letter**
3.	Rule Applicability Analysis: ☑ Attached, Document ID: **Cover Letter**
4.	List of Exempt Emissions Units: ☑ Attached, Document ID: **Cover Letter** ☐ Not Applicable (no exempt units at facility)
5.	Fugitive Emissions Identification: ☐ Attached, Document ID: _____ ☑ Not Applicable
6.	Air Quality Analysis (Rule 62-212.400(7), F.A.C.): ☐ Attached, Document ID: _____ ☑ Not Applicable
7.	Source Impact Analysis (Rule 62-212.400(5), F.A.C.): ☐ Attached, Document ID: _____ ☑ Not Applicable
8.	Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): ☐ Attached, Document ID: _____ ☐ Not Applicable
9.	Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): ☐ Attached, Document ID: _____ ☑ Not Applicable
10.	Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): ☐ Attached, Document ID: _____ ☑ Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units:
   ☐ Attached, Document ID: ☑ Not Applicable **(Submitted 12/2014)**

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only)
   ☐ Attached, Document ID:_____ ☐ Not Applicable (revision application)

2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)
   ☐ Attached, Document ID:_____
   ☐ Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)
   ☐ Attached, Document ID:_____
   Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)
   ☐ Attached, Document ID:_____
   ☐ Equipment/Activities Onsite but Not Required to be Individually Listed
   ☐ Not Applicable

5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)
   ☐ Attached, Document ID:_____ ☐ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
   ☐ Attached, Document ID:_____ ☐ Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms:

   Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☐ Not Applicable (not an Acid Rain source)

   Phase II NO_X Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☐ Not Applicable

   New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☐ Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____
   ☐ Not Applicable (not a CAIR source)

Additional Requirements Comment

EU 001 Form

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

   ☐ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

   ☐ The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

   ☑ This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

   ☐ This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

   ☐ This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Aerospace Manufacturing and Rework Surface Coating Operations Involving Spray Application in Paint Booths / Hangars, Excluding Completed Aircraft.

3. Emissions Unit Identification Number: **EU 001**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:
A	**August 1, 2017**	**September 1, 2017**	**37**

8. Federal Program Applicability: (Check all that apply)

   ☐ Acid Rain Unit

   ☐ CAIR Unit

9. Package Unit:
   Manufacturer: **Panel Built, Inc.** Model Number: **N/A (custom build)**

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:
Commence construction and initial startup dates are for booth planned for B312. See cover letter for additional information.

EMISSIONS UNIT INFORMATION
Section [1] of [1]

Emissions Unit Control Equipment/Method: Control **1** of **1**

1. Control Equipment/Method Description: **Particulate control filter for coatings that are spray applied in a booth or a hangar.**
2. Control Device or Method Code: **018 Fabric Filter – Low Temperature (T < 180°F)**

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

B. EMISSIONS UNIT CAPACITY INFORMATION
(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: **2.73 tons VOC emissions / year**			
2. Maximum Production Rate: **2.73 tons VOC emissions / year**			
3. Maximum Heat Input Rate: million Btu/hr			
4. Maximum Incineration Rate: pounds/hr tons/day			
5. Requested Maximum Operating Schedule:			
	hours/day	**24**	days/week **7**
	weeks/year	**52**	hours/year **8,760**
6. Operating Capacity/Schedule Comment: **Please see cover letter for additional information on current emission limit (EU 001 Condition Number 2).**			

C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **Paint Spray Booth**	2. Emission Point Type Code: **1**
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: **Building 312 Paint Hangar Exhaust Stack**	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **EU 002 shares this exhaust stack for fugitive emission related operations that may be performed in Building 312 and exhaust through the stack.**	

5. Discharge Type Code:	6. Stack Height: Feet **35**	7. Exit Diameter: Feet **3 x 3 (rectangular)**
8. Exit Temperature: °F **TBD**	9. Actual Volumetric Flow Rate: Acfm **12,000**	10. Water Vapor: %

11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude… Latitude (DD/MM/SS) Longitude (DD/MM/SS)
15. Emission Point Comment:	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): **VOC Emissions**		
2. Source Classification Code (SCC): **40202406**	3. SCC Units: **Tons (VOC)**	
4. Maximum Hourly Rate:	5. Maximum Annual Rate: **2.73**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **The following SCC Codes may all apply to this operation Petroleum and Solvent Evaporation, Surface Coating Operations, Large Aircraft 40202401 Prime Coating Operation 40202406 Topcoat Operation Note – SCC Codes 40202402 Cleaning / Pretreatment and 40202405 Equipment Cleanup are included in EU 002**		

Segment Description and Rate: Segment __ of __

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

D. SEGMENT (PROCESS/FUEL) INFORMATION (CONTINUED)

Segment Description and Rate: Segment __ of __

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of __

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC			**EL**

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour **2.73** tons/year	4. Synthetically Limited? ☑ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: **VOC content by material** Reference: **MSDS or Product Data Sheet**	7. Emissions Method Code: **2**
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: ☐ 5 years ☐ 10 years
10. Calculation of Emissions: **Details of emission estimate approach previously submitted to City of Jacksonville in December 2014. Attachment 2, 12-month rolling total database reports, contains recent actual annual emissions from the facility, including EU 001.**	
11. Potential, Fugitive, and Actual Emissions Comment: **Potential VOC emissions are based on current VOC emission limit (EU 001, Condition 2).**	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCRACT	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **2.73 tons per year**	4. Equivalent Allowable Emissions: lb/hour **2.73** tons/year
5. Method of Compliance: **12-month rolling total reports**	
6. Allowable Emissions Comment (Description of Operating Method): **Request continuance (i.e., no change) in current EU 001 VOC emission limit**	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation __ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☑ Previously Submitted, Date **Dec 2014**

2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☑ Previously Submitted, Date **Dec 2014**

3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☑ Previously Submitted, Date **Dec 2014**

4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☑ Previously Submitted, Date **Dec 2014**
   ☐ Not Applicable (construction application)

5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☑ Previously Submitted, Date **Nov 2015**
   ☐ Not Applicable

6. Compliance Demonstration Reports/Records:
   ☑ Attached, Document ID: _____
   Test Date(s)/Pollutant(s) Tested: **VOC / HAP – 12-month rolling total**
   Database emission reports
   ☐ Previously Submitted, Date: _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☐ To be Submitted, Date (if known): _____
   Test Date(s)/Pollutant(s) Tested: _____
   ☐ Not Applicable
   Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute:
   ☐ Attached, Document ID: _____ ☑ Not Applicable

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1.	Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): ☑ Attached, Document ID: **Cover Letter** ☐ Not Applicable
2.	Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): ☐ Attached, Document ID: _____ ☑ Not Applicable
3.	Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☑ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1.	Identification of Applicable Requirements: ☐ Attached, Document ID: _____
2.	Compliance Assurance Monitoring: ☐ Attached, Document ID: _____ ☐ Not Applicable
3.	Alternative Methods of Operation: ☐ Attached, Document ID: _____ ☐ Not Applicable
4.	Alternative Modes of Operation (Emissions Trading): ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements Comment

ATTACHMENT 2

Attachment 2:

12-Month Rolling Total Emission Reports

The Boeing Company (Cecil Field) - 12-Month Rolling Total VOC Emissions (Actuals)

Facility ID - 0310607

Permit Number - 0310607-002-AO

For dates between 5/1/2016 and 4/30/2017

MSDS Number	MSDS Name	Usage Amount	Usage Amount Units	Density (lb/gal)	Amount (lbs)	VOC Content (lb/gal)	VOC (lbs)	VOC (tons)
EU001 Bldg 1823 Paint Booths		**555.28**					**1,333**	**0.67**
100178	CAAPCOAT FP-50 POLYURENTHANE TOPCOAT W/CURING AGENT COLOR NO.36320	4.75	GAL	8.31	39.50	5.30	25.19	0.01
101092	44-GN-072 (2 PT PT KIT)	263.88	GAL	10.43	2,752.31	1.20	316.66	0.16
107053	CAAPCOAT FP-70 CONDUCTIVE POLY COATING	8.00	GAL	10.842	86.74	3.75	30.00	0.02
108855	CAAPCOAT FP-70 HSC CONDUCTIVE POLYURETHANE COATING	2.13	GAL	8.31	17.66	5.43	11.54	0.01
115042	CA 8112/F36375 ANTI-CHAFE FLAT GRAY BASE COMPONENT	8.25	GAL	10	82.50	3.51	28.96	0.01
157157	03-BK-106 #37038 (2 PT QT KIT)	1.50	GAL	10.35	15.53	3.50	5.25	0.00
34197	44GN024	0.50	GAL	9.43	4.72	2.84	1.42	0.00
36720	825X480 Koroflex Primer Green Base Component	24.00	GAL	8.88	213.12	4.72	113.28	0.06
41955	910X751 KOROFLEX PRIMER ACCELERATOR	5.25	GAL	7.53	39.53	6.36	33.39	0.02
42031	03W127A	24.42	GAL	12.985	317.07	2.29	55.92	0.03
[illegible]	03-GY-292 #36375 (2 TU INSERT KIT)	55.29	GAL	10.34	571.66	3.86	213.40	0.11
75367	03BK074	2.75	GAL	10.34	28.44	3.50	9.63	0.00
76914	44GN036	1.75	GAL	9.05	15.84	2.83	4.95	0.00
82160	03-GY-332 #36231 (2 TU INSERT KIT)	7.73	GAL	10.34	79.95	3.50	27.06	0.01
82185	821X404 KOROTHERM FIRE & THERMAL BARRIER CTG BASE COMPONENT	4.71	GAL	9.76	45.98	0.63	2.97	0.00
88224	03GY287	54.94	GAL	10.26	563.71	2.38	130.76	0.07
89246	833K086 HS INTEGRAL FUEL TANK COATING BASE COMPONENT	2.71	GAL	9.93	26.95	4.56	12.38	0.01
91878	02Y040	18.72	GAL	11.22	210.01	3.01	56.34	0.03
94576	03-OR-047 #12197 (QT KIT)	0.09	GAL	10.02	0.88	2.16	0.19	0.00
97984	09Y002	1.00	GAL	11.53	11.53	2.19	2.19	0.00
999934	3M EC 776 FUEL RESISTANT COATING CLEAR	0.75	GAL	7.5	5.63	7.36	5.52	0.00
999942	TECTYL 894 CL 1 GD 3 (MIL-PRF-16173E)	0.13	GAL	7.2	0.90	3.25	0.41	0.00
999956	HUMISEAL 1B31, CONF. COAT (ACRYLIC)	0.03	GAL	10	0.31	7.36	0.23	0.00
999992	CAAPCOAT FP-65-3 Polyurenthane Coating W/	62.00	GAL	17.514	1,085.87	3.96	245.52	0.12
EU002 Aerospace Operations and Completed Aircraft [illegible]ting		**660.62**					**1,644**	**0.82**
100667	PR-1750 A-1/2 PART A ACCELERATOR	27.62	GAL	15.69	433.42	0.00	0.00	0.00

MSDS Number	MSDS Name	Usage Amount	Usage Amount Units	Density (lb/gal)	Amount (lbs)	VOC Content (lb/gal)	VOC (lbs)	VOC (tons)
101091	PR-2001 B-1/2 PART B BASE COMPONENT	0.19	GAL	11.85	2.22	0.00	0.00	0.00
[illegible]32	DOW CORNING P5200 ADHESION PROMOTOR	0.07	GAL	6.84	0.51	0.36	0.03	0.00
104759	CT CORROSION X CORR PREVENTION COMPOUND	0.50	GAL	7.4	3.69	0.52	0.26	0.00
104835	PB BLASTER PENETRATING CALALYST	3.26	GAL	7.26	23.67	1.90	6.19	0.00
105880	FASTBLOCK 100 (RTV-MB-401/RTV-MB-416) TA 18000	0.61	GAL	10.84	6.60	0.43	0.26	0.00
109200	PR-1750 B-1/2 PART B BASE COMPONENT	41.75	GAL	15.69	655.07	0.13	5.43	0.00
111429	PR-1750 A-2 A/B (655SK)	10.58	GAL	15.69	165.95	1.65	17.45	0.01
111653	PR-2001 B-12 PART A ACCELERATOR COMPONENT	9.08	GAL	12.1	109.86	0.10	0.91	0.00
111656	PR-2001 B-12 PART B BASE COMPONENT	1.12	GAL	11.85	13.31	0.00	0.00	0.00
115856	AC-130 PART B	1.86	GAL	10	18.61	0.17	0.32	0.00
115860	AC-130 4-PART PART D	1.98	GAL	8.34	16.51	0.17	0.34	0.00
116944	SOLVENT NAPHTHA TT-N-95 TY2	0.38	GAL	6.176	2.32	6.41	2.40	0.00
120100	PR-2414TA/B ELASTOMERIC COATING	3.37	GAL	23.12	77.91	1.62	5.46	0.00
122432	3M ADHESIVE REMOVER CITRUS BASE	0.43	GAL	6.613	2.86	3.70	1.60	0.00
128239	PR-2202 B-1 PART B BASE COMPONENT	0.75	GAL	10	7.49	0.84	0.63	0.00
138905	WHIZ AIRCRAFT WINDSHIELD POLISH COMPOUND	0.62	GAL	10	6.24	1.78	1.11	0.00
145109	NAZDAR 5900 SERIES SILK SCREEN INK BLUE-GRAY #2155259	0.75	GAL	10	7.50	2.90	2.18	0.00
145299	PB BLASTER AIR TOOL CONDITIONER	1.37	GAL	7.17	9.84	1.10	1.51	0.00
145942	PP-560 PLASTIC POLISH	0.13	GAL	10	1.25	2.23	0.28	0.00
148059	METHYL ISOBUTYL KETONE	1.06	GAL	6.69	7.06	6.67	7.04	0.00
151968	EVERLUBE PERMA-SLIK G (MIL-L-23398 TY 1)	0.75	GAL	8.15	6.11	6.15	4.61	0.00
152154	LOCTITE 089 GRADE AA WELD SEALANT	0.00	GAL	10	0.00	0.12	0.00	0.00
16652	RTV 106 SILICONE RUBBER SEALANT (RED)	0.57	GAL	8.84	5.02	0.22	0.12	0.00
16654	RTV 162 SILICONE RUBBER SEALANT (WHITE)	0.66	GAL	9.05	5.93	0.37	0.24	0.00
16678	RTV88 SILICONE RUBBER COMPOUND (RED)	0.50	GAL	12.51	6.26	0.17	0.09	0.00
17140	PARTALL FILM 10	2.00	GAL	8.01	16.02	2.90	5.80	0.00
18902	LOCTITE EA 934NA PART A	1.25	GAL	12.93	16.16	0.08	0.10	0.00
19721	3M SCOTCH-GRIP 1357	0.47	GAL	6.79	3.18	5.62	2.63	0.00
20084	3M SCOTCH-GRIP 847	1.57	GAL	7.589	11.91	0.00	0.00	0.00
2072	RTV 3140 ADHESIVE SEALANT (CLEAR)	0.05	GAL	8.757	0.41	0.01	0.00	0.00
[illegible]	RTV 3145 ADHESIVE SEALANT (CLEAR)	0.09	GAL	9.34	0.87	0.01	0.00	0.00

MSDS Number	MSDS Name	Usage Amount	Usage Amount Units	Density (lb/gal)	Amount (lbs)	VOC Content (lb/gal)	VOC (lbs)	VOC (tons)
22858	LOCTITE 222MS TREADLOCKER LOW STRENGTH 22231	0.01	GAL	10	0.13	0.01	0.00	0.00
[illegible]2	3M SUPER 77 ADHESIVE SPRAY	3.87	GAL	5.813	22.49	4.40	17.02	0.01
27232	LOCTITE 242 THREADLOCKER	0.05	GAL	9.174	0.48	0.41	0.02	0.00
29363	EA 956 PART B	3.00	GAL	10	30.00	0.08	0.24	0.00
30118	DOW CORNING Q4-2805 SEALANT (LARGE END)	3.32	GAL	11.34	37.68	0.11	0.37	0.00
30579	LOCTITE 262 THREADLOCKER	0.05	GAL	10	0.53	0.00	0.00	0.00
31092	F-900 TORQUE RED SEAL	0.37	GAL	8.98	3.29	0.03	0.01	0.00
3282	RTV 102 SILICONE RUBBER SEALANT (WHITE)	0.20	GAL	8.84	1.74	0.22	0.04	0.00
3283	RTV 103 SILICONE RUBBER SEALANT (BLACK)	0.22	GAL	10	2.18	0.22	0.05	0.00
3285	RTV 108 SILICONE RUBBER SEALANT (CLEAR)	0.33	GAL	10	3.28	0.22	0.07	0.00
33008	EA 9390 RESIN PART B	2.00	GAL	7.92	15.84	0.08	0.16	0.00
33095	DOW CORNING Q4-2817 FLUOROSILICONE SEALANT	0.08	GAL	15.01	1.26	7.36	0.62	0.00
33137	RTV 112 SILICONE RUBBER SEALANT (WHITE)	0.22	GAL	8.51	1.84	0.56	0.12	0.00
33207	EA 9394 PART A	18.00	GAL	11.34	204.12	0.08	1.44	0.00
3439	A 1177B1/B2 STRUCTURAL EPOXY	0.75	GAL	11.76	8.82	0.00	0.00	0.00
[illegible]6	3M 3950 EDGE SEALER	0.87	GAL	8.089	7.07	4.38	3.83	0.00
35791	RTV 133 (BLACK) (SITE ONLY)	0.87	GAL	10.26	8.89	0.50	0.43	0.00
4516	LOCTITE 635 RETAINING COMPOUND	0.12	GAL	9.174	1.09	0.47	0.06	0.00
47043	EA 9394S PART A	31.64	GAL	11.34	358.76	0.08	2.53	0.00
49105	RTV 3145 ADHESIVE SEALANT GRAY	0.16	GAL	10	1.64	0.00	0.00	0.00
50363	73X BLACK MARKING INK (BCS)	0.09	GAL	10	0.94	6.18	0.58	0.00
51577	73XNWW WHITE MARKING INK(A-7 PLAN REQ)	0.09	GAL	10	0.94	6.18	0.58	0.00
53646	PR-3500 PAINT REMOVER	21.00	GAL	9.93	208.53	7.08	148.68	0.07
53845	SP-400 CORROSION INHIBITOR (AEROSOL)	2.50	GAL	7.26	18.12	5.24	13.08	0.01
53848	CRC WASP & HORNET KILLER II	0.22	GAL	6.59	1.44	0.09	0.02	0.00
55343	VERSILOK 201	3.31	GAL	10	33.13	0.15	0.50	0.00
55789	EA 960F PART A	2.50	GAL	10.425	26.06	0.08	0.20	0.00
61468	RTV 167 SILICONE RUBBER SEALANT (GRAY)	0.04	GAL	8.757	0.38	0.53	0.02	0.00
64421	EA 9321 PART A	6.00	GAL	10.26	61.56	0.08	0.48	0.00
68797	EPOXY THINNER 020X411	1.00	GAL	6.84	6.84	6.99	6.99	0.00
75438	ISOPROPANOL ISOPROPYL ALCOHOL 99%	0.00	GAL	6.547	0.00	6.56	0.00	0.00
78405	DYSOL DS-108 SOLVENT	4.00	GAL	7.92	31.68	7.90	31.60	0.02

MSDS Number	MSDS Name	Usage Amount	Usage Amount Units	Density (lb/gal)	Amount (lbs)	VOC Content (lb/gal)	VOC (lbs)	VOC (tons)
79057	HEXANE (95% N-HEXANE) ULTRA RESIANALYZED	1.06	GAL	5.5	5.81	5.46	5.77	0.00
[illegible]9	PERMABOND 910 GLUE	0.16	GAL	8.76	1.37	0.17	0.03	0.00
82049	PR-148 BLUE ADHESION PROMOTER	11.86	GAL	6.84	81.10	6.69	79.32	0.04
82153	DESOCLEAN 45 020X413	172.00	GAL	6.84	1,176.48	6.54	1124.88	0.56
82282	LOCTITE 7649 PRIMER	0.04	GAL	6.62	0.23	7.36	0.26	0.00
82350	DYKEM STEEL BLUE LAYOUT FLUID	0.37	GAL	7.09	2.65	6.58	2.46	0.00
88552	LOCTITE 7471 PRIMER T (BCF ONLY)	0.18	GAL	10	1.76	0.88	0.15	0.00
89770	EASTMAN MPK METHYL PROPYL KETONE	0.00	GAL	6.75	0.00	6.76	0.00	0.00
90593	PR-182 PINK ADHESION PROMOTER	4.49	GAL	8.34	37.47	0.42	1.89	0.00
93735	E-Z GRIP FUNCTIONAL FLUID (AIRCRAFT GRADE)	0.98	GAL	8.34	8.20	0.06	0.06	0.00
94576	03-OR-047 #12197 (QT KIT)	21.72	GAL	10.02	217.68	2.16	46.92	0.02
95286	DYKEM STEEL RED LAYOUT FLUID	0.09	GAL	7.089	0.66	6.65	0.62	0.00
96803	PR-1750 A-2 A/B (655SK)	33.50	GAL	15.69	525.64	1.65	55.28	0.03
96805	PR-1750 B-1/2 PART A ACCELERATOR COMPONENT	38.47	GAL	15.69	603.59	0.00	0.00	0.00
96809	PR-1750 B-2 PART B BASE COMPONENT	45.52	GAL	13.1	596.25	0.13	5.92	0.00
96811	PR-1750 B-2 PART A ACCELERATOR COMPONENT	46.38	GAL	15.69	727.68	0.00	0.00	0.00
99695	CAMIE A1000 DRY RELEASE AGENT	5.68	GAL	5.596	31.78	3.56	20.22	0.01
[illegible]0	TCC-5220 A/B FAST PATCH PASTE	42.00	GAL	8.59	360.74	0.00	0.00	0.00
999935	MS-242N-AS ANTI-STATIC QUIK-FREEZE	0.00	GAL	10	0.00	7.36	0.00	0.00
999936	3M SCOTCH-WELD EC-1099 NITRILE HIGH PERFORMANCE PLASTIC	0.04	GAL	7.5	0.29	0.04	0.00	0.00
999941	PR-188 ADHESION PROMOTER	0.25	GAL	10.66	2.67	0.00	0.00	0.00
999949	LOCTITE GRADE A THREADLOCKER HIGH STRENGTH PART NO 08831	0.01	GAL	7.48	0.10	0.00	0.00	0.00
999950	ND VIBRA-TITE FORMULA 3	0.07	GAL	10	0.66	5.09	0.34	0.00
999952	CITRISTRIP STRIPPING GEL	0.25	GAL	9.6	2.40	6.19	1.55	0.00
999953	METHYL PROPYLKETONE (MPK)	0.00	GAL	6.74	0.00	6.74	0.00	0.00
999954	BRULIN MP 1793 SOLVENT TOWELETTES (50 CT/PKG)	2.00	GAL	6.42	12.84	0.18	0.36	0.00
999998	LOCTITE EA 9396 A/B	11.25	GAL	11.34	127.58	0.08	0.90	0.00
Facility Grand Total (lbs)								**2,976.78**
Facility Grand Total (tons)								**1.49**

lb = pounds
lb/gal = pounds per gallon
tpy = tons per year
VOC = Volatile Organic Compound
[illegible] Usage amount above reported as 0.00 corresponds to a value of less than 0.005 gallons.

This report is provided to meet the requirements of EU001 Permit Condition 6 and EU002 Permit Condition 7.

ATTACHMENT 3

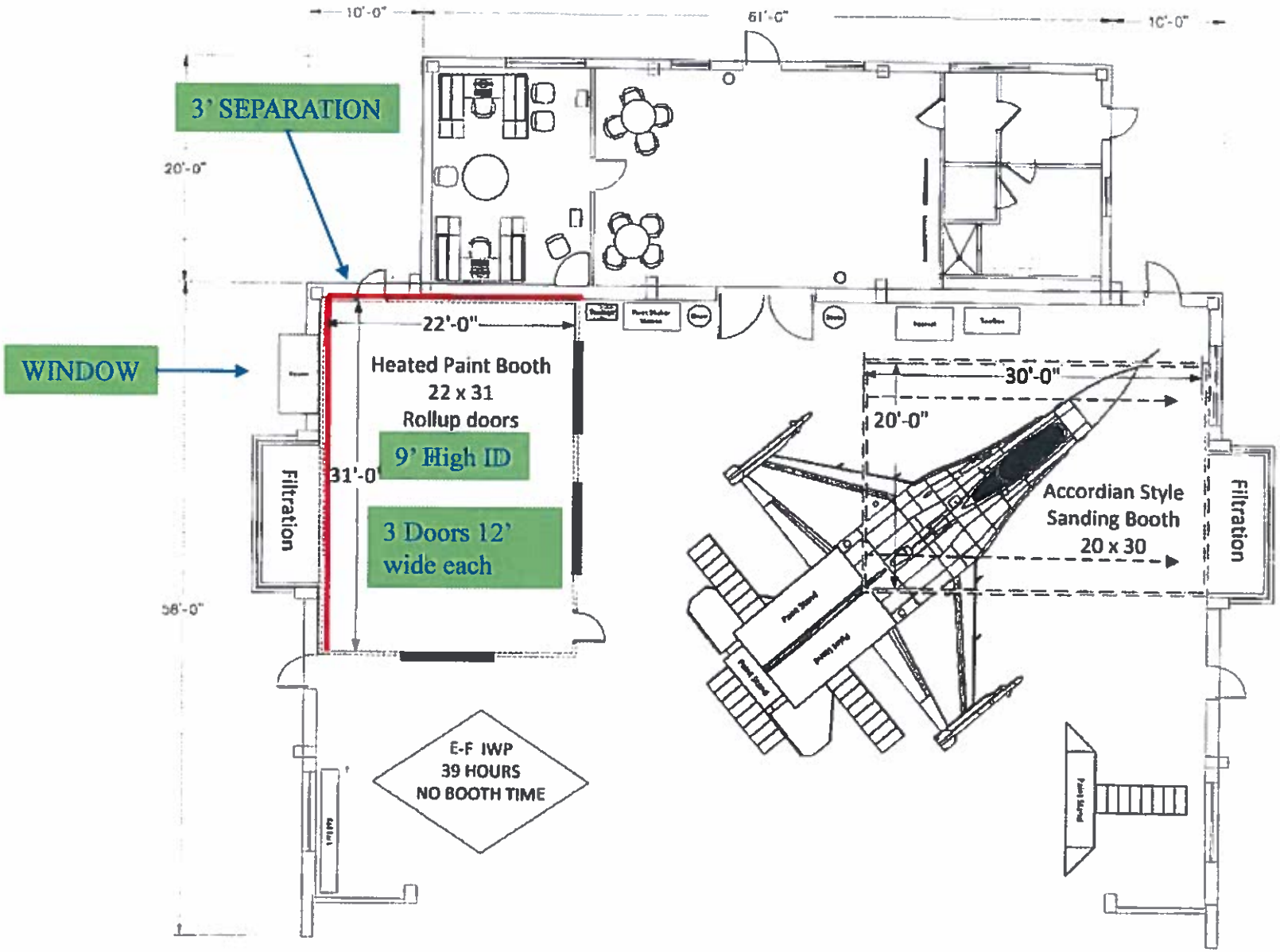
Attachment 3:

Building 312 – Proposed Layout

Sceniaro 11

Bldg. 312

Proposed Layout



ATTACHMENT 4

Attachment 4:

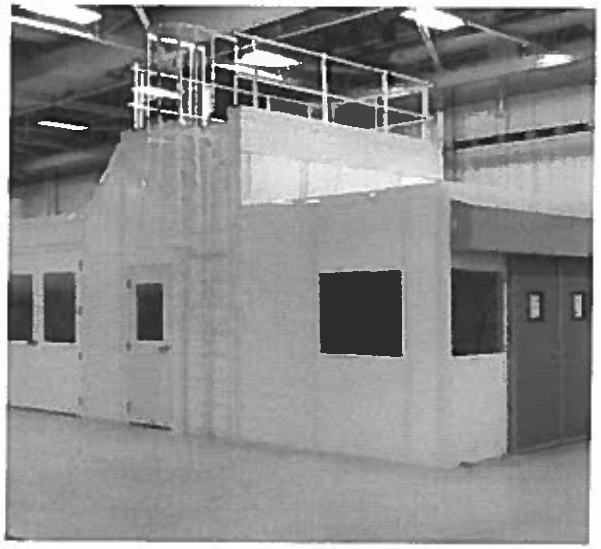
Panel Built, Inc.

Paint Booth Supporting Information

Custom Paint Booths

The most important part of your custom paint booth is that it is a clean space with very little particle disruption. Things such as dust, dirt, and hair can ruin any the greatest of paint jobs. However, there is a solution! We can design a system to make it much easier for you to have a perfect painting environment. No matter what you are painting, we can provide door options to fit any sized object to ensure easy transportation and comfortable spacing. Options to consider when deciding a Paint Booth include enter and exit locations, ventilation, and size.

Building your paint booth through modular construction provides you with a number of benefits as opposed to traditional, stick built methods. With modular construction for instance, you will have far less site disturbance in your facility meaning you will not have the tremendous and miserable downtime. Instead, your new paint booth will be prebuilt and just needs to be installed at your site, which takes just a fraction of the time. Plus, when you decide to build modular, your overall lead time is drastically reduced as well.



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ATTACHMENT 5

Attachment 5:

Sanding Booth Emission Estimates

The Boeing Company
Cecil Field Facility
Facility ID 0310607

Table 1: Sanding Booth
PM Emission Estimates

May 2017

Purpose:
This worksheet provides emission estimates for the sanding booth at the Boeing Cecil Field Facility. Emissions of particulate matter (PM) are estimated.

The underlying assumption is that the total amount of material removed by sanding is equal to the amount of coating solids applied by the surface coating operations.

The first step is to estimate the amount of coating solids applied to materials.
From the May 1, 2016 through April 30, 2017 environmental database reports:

Parameter	Value	Units	Notes
Total VOC emissions	1,333	pounds	From AOR Template
Total Weight of Materials	6,215.34	pounds	From AOR Template
Weight of Solids	4,882.34	pounds	Total weight - VOC emissions
Minimum Transfer Efficiency (HVLP Gun)	65%	percent	SCAQMD minimum value
Assumed Transfer Efficiency	70%	percent	SCAQMD minimum value plus 5%
Solids applied to components	3,417.64	pounds	Total Solids * Transfer Efficiency
Solids removed from components	3,417.64	pounds	Equal to solids re-applied
Filter control efficiency	98%	percent	Mminimum for Rule 6H
PM Emissions (actual)	68.35	pounds / year	Solids removed * (1 - filter efficiency)
PM Emissions (actual)	0.03	tons / year	(pounds / year) * (1 ton / 2,000 lbs)

Next, estimate potential emissions

Parameter	Value	Units	Notes
VOC Emission Limit	2.73	tons / year	EU 001, Condition 2
Actual Annual VOC emissions	1,333	pounds / year	From above
Actual Annual VOC emissions	0.67	tons / year	(pounds / year) * (1 ton / 2,000 lbs)
Ratio PTE : Actual	4.10	dimensionless	(VOC Limit) / (Actual VOC emissions)
PM Emissions (Potential)	279.97	pounds / year	Actual Emissions * (PTE : Actual)
PM Emissions (Potential)	0.14	tons / year	Actual Emissions * (PTE : Actual)