FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

RICK SCOTT
GOVERNOR

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LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Electronically sent – Received Receipt requested

DRAFT PERMIT

PERMITTEE

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

Authorized Representative:
Ted Dyer, Sr. Manager, EH&S

Air Permit No. 0610023-006-AC
Permit Expires: 01/30/2014
Site Name: Piper Aircraft, Inc.
Synthetic Minor Source Air Construction Permit
Project Name: Booths Replacement

This is the final air construction permit, which authorizes modification of Emission Unit No. 012 with the replacement of two existing paint spray booths. The proposed work will be conducted at the Piper Aircraft, Inc. (Standard Industrial Classification No. 3721). The facility is located in Indian River County at 2926 Piper Drive in Vero Beach, Florida. The UTM coordinates are Zone 17, 557.56 km East, and 3058.43 km North. 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida

DRAFT January 17, 2013

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Caroline D. Shine Date
District Air Program Administrator
Central District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on January 17, 2013 to the persons listed below:

Mr. Ted Dyer, Manager, Environment, Health & Safety, Piper Aircraft **(ted.dyer@piper.com)**
Mr. Aaron Bowles, P.E., Vice President, MBV Engineering **(aaronb@mbveng.com)**
Ms. Stacy Gordon, MBV Engineering **(stacyg@mbveng.com)**
Ms. Ana Oquendo, EPA Region 4 **(oquendo.ana@epa.gov)**
Ms. Natasha Hazziez, EPA Region 4 **(hazziez.natasha@epa.gov)**

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

DRAFT

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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) active paint booths, two (2) trim booths, a plastics booths, an aluminum cleaning and etch 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 (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) Seven Paint Booths/(2) Trim Booths/(1) Plastics Booth
013	(2) Hot Water Heaters/(3) Steam Boilers

Project Description and Affected/Proposed Emission Unit

This project will modify Emission Unit No. 012 and involves the replacement of two (2) existing open paint booths with two (2) new full downdraft booths. Fabric filters will help to control particulate air emissions.

This project will modify the following emission unit.

Facility ID No. 0610023	
ID No.	Emission Unit Description
012	(7) Seven Paint Booths/(2) Trim Booths/(1) Plastics Booth

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.
- The facility is a synthetic non-Title V source. The facility has a Federally Enforceable State Operation Permit (FESOP).

PERMIT HISTORY/AFFECTED PERMITS

This is an air construction permit for the replacement of two paint spray booths. It is anticipated that the current FESOP Permit will be revised after construction and compliance testing have been completed, and a FESOP permit revision application has been submitted.

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

   Florida Department of Environmental Protection
   Central District Office
   Air Resource Management Section
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767
   Telephone: 407-897-4100

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

   {Permitting Note: The permitting authority for all future Air Permitting Projects for this facility will be the Southeast District Office}

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

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility. [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Revision Application: A completed application for an air operation permit revision shall be submitted to the Permitting Authority (Southeast District Office) no later than 60 days prior to the expiration date of this construction permit. To apply for an air operation permit revision, 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. copies of the most recent compliance test reports required by Specific Condition No. **A.6**, if not previously submitted;

   d. copies of the most recent two months of records/logs specified in Specific Condition No(s). **A.12**.

   The application shall be submitted to the Permitting Authority (Southeast District Office).

   [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.]

A. Facility-Wide and Replacement Paint Spray Booths Specific Conditions

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
012	(7) Seven Paint Booths/(2) Trim Booths/(1) Plastics Booth

EQUIPMENT

A.1. Replacement paint spray booths (new full downdraft booths): The permittee is authorized to replace (2) existing open paint booths with (2) new full downdraft booths.
[Permit Application No. 0610023-006-AC and Rule 62-4.070(3), F.A.C.]

PERFORMANCE RESTRICTIONS

A.2. Restricted Operation. The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200, (PTE), F.A.C]

A.3. 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.4. General Visible Emissions Limitation: The visible emissions from the replacement paint spray booths (new full downdraft booths) are limited to less than 20% opacity.
[Rule 62-296.320(b)1., F.A.C.]

A.5. 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.6. Compliance Tests: The replacement paint spray booths (new full downdraft booths) shall be tested to demonstrate initial compliance with the emissions standard for visible emissions, specified in Specific Condition No. **A.4.** The initial tests shall be conducted no later than 90 days after initial operation of the units. [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

A.7. 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.8. 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 tests 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 62-297.401, F.A.C.]

NOTIFICATION REQUIREMENTS

A.9. 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 conducted for the permittee.[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.10. Notification of Operation Commencement: The permittee shall notify the Compliance Authority (Southeast District Office) in writing of the date of commencing operation of the replacement paint spray booths (new full downdraft booths), no later than five (5) business days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C. and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

A.11. 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.12. Monthly Recordkeeping Requirement. In order to demonstrate compliance with Specific Condition No. **A.5.**, the permittee shall maintain a log at the facility for a period of at least five (5) years from the date the data is recorded. The log, at a minimum, shall contain the following:

Monthly

a. Facility name, Facility ID No. (0610023), Emission Unit ID No. and Description (i.e., EU 012, (7) Seven Paint Booths/(2) Trim Booths/(1) Plastics Booth);

b. Month/Year of record; and

c. Consecutive 12-months total of total VOC, total HAPs and individual HAPs

Monthly logs shall be completed by the end of the following month.

Note: A consecutive 12 month 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-month total treats each month of the year as the end of a 12-month period. A 12-month 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 month total can be maintained each month.
[Rules 62-4.070(3), F.A.C.]

A.13. Supporting Documentation: Supporting documentation (chemical usage tracking logs, "As Supplied" sheets, "As Applied" sheets, MSDS sheets, EPA data sheets, purchase orders, waste shipment/disposal records, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions for a minimum of five (5) years and 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.14. Additional Recordkeeping Requirements: Records specified in Specific Condition No. **A.12.** (previous condition) 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.]