TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

Piper Aircraft, Inc.

Facility ID No. 0610023

PROJECT

Project No. 0610023-006-AC
Application for Synthetic Minor Source Air Construction Permit
Project Name: Booths Replacement

COUNTY

Indian River County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

January 15 & 17, 2013

Prepared by Jeffrey Rustin, P.E.

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. <u>Project Description:</u>

A. Applicant:

Ted Dyer, Manager, EH&S
Piper Aircraft, Inc.
2926 Piper Drive
Vero Beach, Florida 32960-1954

B. Professional Engineer:

Aaron Bowles, P.E.
MBV Engineering
1835 20th Street
Vero Beach, Florida 32960

C. Project Location:

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

D. Project Summary:

This project which authorizes modification of Emission Unit No. 012 with the replacement of a two paint spray booths, as further described in the permit.

E. Application Information:

Application Received on: 12/26/2012
Application Complete: 12/26/2012

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.	Y	Not exempt from general permitting requirements.
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Unconfined particulate matter emissions from vehicular traffic on paved and unpaved roads; and construction activities.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Paint spraying operations are a source of VOC and odors.
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Indian River County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category for this project.

Subject to:	Y/N	Comments
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	N	There is no applicable source category.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	Facility is a synthetic minor source.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	Initial compliance test for visible emissions.

III. Summary of Emissions

Pollutant	EU No. and brief description	Actual Emissions (tpy)	Allowable Emissions (tpy)
Total HAPS	Facility	Less than 1.0	Less than 25.0
Single HAP	Facility	Less than 1.0	Less than 10.0
VOC	Facility	35.438*	Less than 99.0

* actual emissions for recent 12 consecutive month period (calendar year 2011).

Since the project consists of the replacement of existing spray paint booths, no increase in in actual air emissions is anticipated.

IV. Federal NSPS and/or NESHAP Provisions

A. No applicable NSPS or NESHAP Provisions.

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft

permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).