



Florida Department of Environmental Protection

Southeast District Office
400 N. Congress Avenue, Suite 200
West Palm Beach, FL 33401
561-681-6600

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FEDERALLY ENFORCEABLE STATE OPERATION PERMIT

Sent by Electronic Mail – Received Receipt Requested
sandhpa@voughtaircraft.com

ISSUED TO:

Triumph Aerostructures, LLC
1801 SE Airport Road
Stuart, FL 34996-4012

Permit Number: 0850005-014-AF

Issue Date:

Expiration Date: August 13, 2013

Renewal Date: June 22, 2013

Authorized Representative:

Mr. Paul Sandhu, General Manager

PROJECT:

Located At: 1801 SE Airport Road Stuart, FL 34996-4012

Project: Description: Federally Enforceable State Operation Permit to modify permit No. 0850005-008-AF, that incorporate two recent construction permits that modify EUs 002, 003, 011, and 012.

SIC: 3728 Aircraft Parts and Auxiliary Equipment

UTM/ Lat. - Long: Zone 17; 575.36 Km. E; 3006.31 Km. N 27°10'44" N / 80°13'54" W

STATEMENT OF BASIS:

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297, and in conformance with all existing regulations of the Florida Department of Environmental Protection. The above named owner or operator is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department, in accordance with the terms and conditions of this permit.

ISSUED BY:

Executed in West Palm Beach, Florida

Jill S. Creech, P.E.
Southeast District Director

Date

JC/LA/md

SECTION I -- SUMMARY INFORMATION

PERMIT HISTORY:

- August 15, 2011, EPSAP Application for air operation permit renewal received
- August 25, 2011, Professional Engineer Authentication Code and signature document received.
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PERMIT CONTENT

- Section I: Summary Information
- Section II: Facility-Wide Specific Conditions
- Section III: Emissions Unit Specific Conditions
- Section IV: Appendices
 - Appendix A: General Permit Conditions*
 - Appendix B: Citation Format*

REGULATORY CLASSIFICATIONS

Title III:	The facility is a synthetic minor source of hazardous air pollutants (HAP)
Title IV:	The facility does not operate any units subject to the acid rain provisions of the Clean Air Act.
Title V:	The facility is a synthetic Non-Title V source of air pollution in accordance with Chapter 213, F.A.C.
PSD:	The facility is not a PSD major source in accordance with Rule 62-212.400 F.A.C.
RACT:	The facility is not subject to any RACT requirements
NSPS:	The facility is not subject to the requirements of the New Source Performance Standards
NESHAP:	The facility is subject to the Recordkeeping and Recording of the NESHAP requirements

EMISSIONS UNIT SUMMARY

Emissions Unit Number	Emissions Unit Description
007	Manual Cleaning Operations
013	Paint Mix Booth (Building # 5)
014	Paint Spray Booth (Building # 5)
015	Paint Mix Booth (Building # 33) Former Building No.25
016	Paint Spray Booth (Building # 33) Former Building No.25

SECTION II -- FACILITY-WIDE SPECIFIC CONDITIONS

Conditions in this part generally apply to all emission units and activities covered under this permit.

1.0 Administrative Requirements

- 1.1 Regulating Agencies: All applications, tests, reports, notifications, or other submittals required by this permit shall be submitted to the Florida Department of Environmental Protection, Southeast District Office Air Program at 400 North Congress Ave, Suite 200, West Palm Beach, Florida, 33401. Phone 561-681-6600).
- 1.2 Citation Format: In this permit, references to F.A.C. Rule 62-xxx refer to rules promulgated under Title 62 of the Florida Administrative Code; references (if any) to 40 CFR 60.xx (or 61.xx or 63.xx) refer to regulations codified under Part 60 (or 61 or 63) of Title 40 of the Code of Federal Regulations.
- 1.3 Specific and General Conditions: The owner or operator shall be subject to the specific conditions of this permit and the owner or operator shall be aware of, and operate under, the attached General Conditions, attached as Appendix A of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S. **[Rule 62-4.160, F.A.C.]**
- 1.4 Applicable Regulations: This facility is subject to regulation of Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any other applicable federal, state or local permitting requirements or other regulations.
- 1.5 Other Permits: This air pollution permit does not preclude the owner or operator from obtaining any other types of required permits, licenses or certifications from this Department or other departments or agencies.
- 1.6 Renewal of This Permit Required: An application for renewal of this operation permit must be submitted to the Department of Environmental Protection, Southeast District Office Air Program **at least 60 days prior** to the expiration date of this permit. To apply for an operation permit, the applicant shall submit the appropriate application form in quadruplicate, the appropriate application fee, all required compliance test results, and such additional information as the Department may by law require. **[Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]**

Note that public notice may be required again at the time of renewal or revision of this permit if the facility or permit is materially changed from that described by this permit. [Rule 62-210.350(4)(a), F.A.C.]

2.0 Emission Limiting and Performance Standards

- 2.1 VOC Emissions: Emissions of volatile organic compounds (VOCs), including hazardous air pollutants (HAP) shall not exceed 67.5 tons in any consecutive 12- month rolling period. **[Rule 62-4.070(3), F.A.C., and requested by applicant to escape Title V applicability]**
- 2.2 Total HAP Emissions: Total emissions of all hazardous air pollutants (HAP) shall not exceed 20 tons in any consecutive 12-month rolling period. **[Rule 62-4.070(3), F.A.C., and requested by applicant to escape Title V applicability]**
- 2.3 Individual HAP Emissions: Emissions of individual HAP shall not exceed 8 tons in any 12 consecutive month rolling period. **[Rule 62-4.070(3), F.A.C., and requested by applicant to escape Title V applicability]**

- 2.4 Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. **[Rule 62-296.320(2), F.A.C.]**

Note: An objectionable odor is defined as any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-210.200(200), F.A.C.]

- 2.5 General Visible Emissions Standard: Unless otherwise specified by permit or rule, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20 percent opacity. **[Rule 62-296.320(4)(b), F.A.C.]**

- 2.6 Volatile Organic Compounds/Organic Solvents Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

Such controls include the following:

- a. Tightly cover or close all VOC containers when they are not in use.
- b. Tightly cover all open tanks that contain VOCs when they are not in use.
- c. Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition.
- d. Confine rags used with VOCs to tightly-closed, fire-proof containers when not in use.
- e. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal. **[Rule 62-296.320(1), F.A.C.]**

- 2.7 Unconfined Emissions of Particulate Matter: No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. **[Rule 62-296.320(4)(c), F.A.C.]**

Reasonable precautions include the following:

- a. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- b. Landscaping or planting of vegetation.
- c. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- d. Confining abrasive blasting where possible.

3.0 Operation and Maintenance Requirements

- 3.1 Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. **[Rule 62-210.650, F.A.C.]**

- 3.2 Excess Emissions Requirements **[Rule 62-210.700, F.A.C.]**

- a) Excess emissions resulting from start-up, shutdown or malfunction of these emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. **[Rule 62-210.700(1), F.A.C.]**

- b) Excess emissions, which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented during start-up, shutdown, or malfunction, are prohibited. [Rule 62-210.700(4), F.A.C.]
- c) In case of excess emissions resulting from malfunctions, the owner or operator shall notify the Southeast District Office Air Program within one working day of the nature, extent, and duration of the excess emissions; the cause of the problem; and the corrective actions being taken to prevent recurrence. [Rule 62-210.700(6), F.A.C.]

4.0 Compliance Monitoring Requirements

- 4.1 Test Notification: Unless otherwise specified in this permit, the Department of Environmental Protection, Southeast District Office, Air Program shall be notified in writing of expected compliance test dates at least fifteen (15) days prior to compliance testing. The notification shall include the following information: the date, time, and location of each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner. [Rule 62-297.310(7)(a), F.A.C.]
- 4.2 Testing at Capacity: Compliance testing shall be conducted with the emission units operating at the permitted capacity (90 to 100% of the maximum permitted operation rate of the emission units). If an emissions unit is not tested at permitted capacity, the emission unit shall not be operated above 110% of the test load until a new test showing compliance is conducted. Operation of the emissions unit above 110% of the test load is allowed for no more than 15 days for the purpose of conducting additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
- 4.3 Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard in Rules 62-204 through 62-297 or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

5.0 Report Required

- 5.1 Report Excess Emissions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department Southeast District Office in accordance with Rule 62-4.130, F.A.C. (condition 5.2 below). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
- 5.2 Report Plant Operation Problems: If the owner or operator is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard or fire, wind or by other cause, the owner or operator shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the owner or operator from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]
- 5.3 Retain Records: The permittee shall hold at the facility all records required by this permit and made available for the Department inspection for a minimum of three years from the date of such records, [Rule 62-4.160(11)(b), F.A.C.]
- 5.4 Compliance Test Reports: Compliance test reports shall be submitted to the Department of Environmental Protection, Southeast District Office, Air Compliance Section, as soon as practical, but no later than 45 days after the last sampling run of each test is completed. [62-297.310(8)(b), F.A.C.]

- 5.5 Annual Report Required: On or before April 1 of each calendar year, a completed DEP Form 62-210.900(5), Annual Operating Report (AOR) Form for Air Pollutant Emitting Facility, shall be submitted to the Department of Environmental Protection, Southeast District Office Air Program. Included with this report shall be additional reports, if any, required in Part III -- Emission Unit Specific Conditions. **[Rule 62-210.370(3), F.A.C.]**

PART III A-- EMISSION UNIT SPECIFIC CONDITIONS

This part of this permit addresses the following emission units:

Emissions Unit Number	Emissions Unit Description
013	Paint Mix Booth
014	Paint Spray Booth

PERFORMANCE RESTRICTION

- A.1. Restricted Operation: These emissions units are allowed to operate continuously, i.e., 8,760 hours/year. **[Rule 62-210.200(PTE), F.A.C.]**

EMISSIONS STANDARDS

- A.2. VOC Content: The owner or operator shall determine the VOC content of all materials, coatings, solvents, and shall document the usage of such materials at the referenced emission units. **[Rule 62-4.070(3), F.A.C.]**
- A.3. HAP Content: The owner or operator shall determine the total and individual HAP contents of all materials, coatings, solvents, and shall monitor the usage of such materials at the referenced emission units. **[Rule 62-4.070(3), F.A.C.]**
- A.4. Material Usage: The owner or operator shall monitor the usage of paints, solvents, and other VOCs and HAPs contained materials at the referenced emission units. **[Rule 62-4.070(3), F.A.C.]**

RECORDS AND REPORTS

- A.5. VOC Records: The permittee shall record and maintain the following information:
- The VOC content for each material containing or emitting VOCs.
 - The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emission unit.
 - The total monthly VOC emission rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month. **[Rule 62-4.070(3), F.A.C.]**
- A.6. AOR Supplemental Information: Annual operation reports required in Part II of this permit shall include following supplemental information that was recorded in the previous calendar year:
- The highest 12 consecutive month total VOC.
 - The highest 12 consecutive month total HAPs.
 - The highest 12 consecutive month individual HAP. **[Rule 62-4.070(3), F.A.C.]**
- A.7. Individual & Total HAP: The permittee shall record and maintain the following information:
- The individual and total HAP contents for each material containing or emitting HAP.
 - The material utilization rate on a monthly basis, for all materials containing or emitting HAP used at the referenced emission unit(s).
 - The individual and total monthly HAP emission rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.

- d. A rolling consecutive 12-month total emission rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months.

[Rule 62-4.070(3), F.A.C.]

SECTION III B-- EMISSION UNIT SPECIFIC CONDITIONS

This part of this permit addresses the following emission units:

Emissions Unit Number	Emissions Unit Description
015	New Paint Mix Booth. The mixing of paint takes place in a contained, ventilated booth that exhausts emissions outside the building.
016	New Spray Paint Booth with a maximum process throughput rate of 25 gallons per day with fiber bond paint filters arrestors as a control device, discharging through a vertical stack throughout the roof.

PERFORMANCE RESTRICTIONS

- B.1. Permitted Capacity: Emissions unit 016 has a throughput rate of 25 gallons per day. **[Rule 62-210.200(PTE), F.A.C.]**
- B.2. Restricted Operation: The hours of operation of are not limited (8760 hours per year). **[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]**

EMISSIONS STANDARDS

- B.3. VOC Content: The owner or operator shall determine the VOC content of all materials, coatings, solvents, and shall document the usage of such materials at the referenced emission units. **[Rule 62-4.070(3), F.A.C.]**
- B.4. HAP Content: The owner or operator shall determine the total and individual HAP contents of all materials, coatings, solvents, and shall monitor the usage of such materials at the referenced emission units. **[Rule 62-4.070(3), F.A.C.]**

RECORDS AND REPORTS

- B.5. Retain Records: All records required by this permit shall be kept by the owner or operator and made available for Department inspection for a minimum of three (3) years from the date of such records. **[Rule 62-4.070(3), F.A.C.]**
- B.6. VOC Records: The permittee shall record and maintain the following information:
- The VOC content for each material containing or emitting VOCs.
 - The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emission unit.
 - The total monthly VOC emission rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month. **[Rule 62-4.070(3), F.A.C.]**
- B.7. Individual & Total HAP: The permittee shall record and maintain the following information:
- The individual and total HAP contents for each material containing or emitting HAP.
 - The material utilization rate on a monthly basis, for all materials containing or emitting HAP used at the referenced emission unit.

- c. The individual and total monthly HAP emission rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.
- d. A rolling consecutive 12-month total emission rate for individual and total HAP, calculated from the monthly totals for the previous twelve calendar months. [**Rule 62-4.070(3), F.A.C.**]

B.8. Annual Report Required: On or before April 1 of each calendar year, a completed DEP Form 62-210.900(5), Annual Operating Report (AOR) Form for Air Pollutant Emitting Facility, shall be submitted to the Department of Environmental Protection, Southeast District Office Air Program. Included with this report shall include following supplemental information that was recorded in the previous calendar year:

- b) The highest 12 consecutive month total VOC.
 - c) The highest 12 consecutive month total HAP.
 - d) The highest 12 consecutive month individual HAP.
- [**Rule 62-4.070(3), F.A.C.**]