

**BEST AVAILABLE COPY**

**P 408 532 027**

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED—  
NOT FOR INTERNATIONAL MAIL

*(See Reverse)*

Sent to <b>Mr. R. H. Henson</b>	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
<b>TOTAL Postage and Fess</b>	<b>\$</b>
Postmark or Date  7/31/86	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983 447 345

**SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1.  Show to whom, date and address of delivery.  
2.  Restricted Delivery.

3. Article Addressed to:  
**Mr. R. H. Henson  
United Technologies Corp.  
P. O. Box 1621  
West Palm Beach, FL 33402**

4. Type of Service: <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	Article Number  <b>P 408 532 027</b>
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Always obtain signature of addressee or agent and **DATE DELIVERED.**

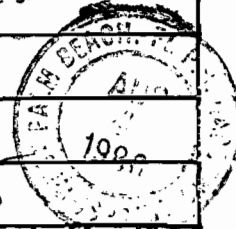
5. Signature — Addressee  
X

6. Signature — Agent  
X *[Signature]*

7. Date of Delivery  
10pp

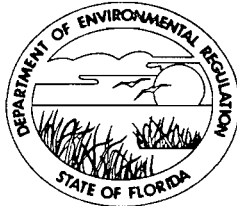
8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

Mr. R. H. Henson  
Manager - Plant Engineering  
United Technologies Corporation  
Post Office Box 1621  
West Palm Beach, Florida 33402

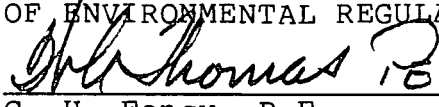
July 30, 1986

Enclosed are Permit Numbers AC 50-113559, AC 50-113784, and AC 50-113785 to United Technologies Corporation which authorize the construction of a work table and two spray booths at your facility in Palm Beach County, Florida. These permits are issued pursuant to Section 403, Florida Statutes.

Any Party to these permits has the right to seek judicial review of the permits pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301; 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 of Appeal must be filed within 30 days from the date these permits are filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

*for*   
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

Copies furnished to:

Isidore Goldman  
Gene Sacco

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on July 31, 1946 to the listed persons.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Patricia G. Adams July 31, 1946  
Clerk Date

Final Determination

United Technologies Corporation  
West Palm Beach, Florida  
Palm Beach County

Source

Permit Number:

Floor Type Spray Booth  
Auto Spray Booth  
Work Table

AC 50-113559  
AC 50-113784  
AC 50-113785

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

July 28, 1986

## Final Determination

United Technologies Corporation's applications for permits to construct a floor type spray booth, an auto spray booth, and a work table at their existing aircraft assembly facility that is located in Palm Beach County have been reviewed by the Bureau of Air Quality Management. Public Notice of the department's intent to issue the permits was published in The Palm Beach Post on May 29, 1986. The company and the Southeast Florida's District submitted comments on the Technical Evaluation and Preliminary Determination and draft permits.

The company commented that the emissions from the booths listed in the table on page 2 of the determination had been reversed. The bureau agrees with this comment. The table should have read as follows:

<u>Source</u>	<u>lb VOC/Day</u>	<u>TPY VOC</u>
Work Bench	0	0
Floor Type Spray Booth	15	1.7
Auto Spray Booth	243.5	3.3

The district's comments addressed the initial May 27, 1986, Technical Evaluation and Preliminary Determination. Generally, the points raised would apply to the revised determination also.

The district asked if the paint spray booth permits could be combined, should the expiration date of the construction permits be extended, and requested clarification of a number of specific conditions in the permits.

The applicant submitted two applications for the booths. The booths are for different operations and use different types of coatings. If the operations at either booth become subject to another regulation in the future, it is easier to determine applicability and assign the appropriate standard if the sources are permitted separately. For these reasons, the bureau has concluded that separate permits are appropriate.

The bureau is in agreement with the district in that the expiration date proposed in the draft permits do not allow adequate time for the sources to be constructed, tested, applications for permit to operate be prepared and processed, and permits to operate to be issued or denied. Therefore, the bureau is extending the expiration date of the three permits to December 31, 1986.

The district asked which department office would approve increase in hours of operation, production, and coating consumption. Similar conditions are routinely placed in permits to allow the department to track any operational change of a source that may

subject it to a new regulation. Request for increase should be submitted to the district office and forwarded to the bureau with any comments the district feels are appropriate. The bureau will determine if the requested increases can be authorized.

The district requested the specific condition prohibiting objectionable odors (AC 50-113785 and AC 50-113559, Specific Condition #3) be reworded. The specific condition in the permits basically quotes the department's regulation on objectionable odors. No additional language was added to the specific condition to limit its applicability. The review engineer believes the regulations and specific conditions are consistent and no change is needed. The district should follow its normal policy in enforcing this specific condition concerning objectionable odors.

The district asked that the specific condition requesting the applicant to seek low solvent coatings be reworded to have a specific goal on the VOC content of the coating. The intent of this specific condition is for the applicant to substitute a coating with the lowest VOC content that meets their specification. The bureau believes this specific condition expresses our intention as written.

The district inquired if the booths would be subject to RACT at higher VOC emissions. A decision was made within the bureau and discussed in the May 16, 1986, Revised Technical Evaluation and Preliminary Determination that the painting of aircraft is not subject to RACT.

The district did not understand the difference in several specific conditions (AC 50-113785, Specific Condition #2 & 3). One prohibited operations when the air pollution control system was not working properly and another required the system to be repaired promptly. The intent of the first restriction is that the system be shut down when it malfunctions. The intent of the other condition, that it be repaired promptly, is to keep the system in operational condition at all times. This will allow a field inspector to determine the compliance status of the booth with a minimum number of visits.

Several specific conditions (AC 50-113785, Specific Condition #5) restricted production at this plant. Each restriction applied only to the permit it is contained in. All permits had similar, consistent restrictions.

The final action of the department will be to issue the permits to construct as proposed in the May 16, 1986, Revised Technical Evaluation and Preliminary Determination except for the extension of the expiration dates to December 31, 1986.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

PERMITTEE:  
United Technologies Corp.  
P. O. Box 2691  
West Palm Beach, FL 33402

Permit Number: AC 50-113559  
Expiration Date: December 31, 1986  
County: Palm Beach County  
Latitude/Longitude: 26° 54' 19" N  
81° 19' 08" W  
Project: Floor Type Spray Booth  
(PS-14-SIK)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application(s) and approved drawings plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Installation of a Binks floor type spray booth (Model No. PFA-8-7-T-LH) equipped with an Andreae filter. Interior wood components for aircraft are coated with varnish or lacquer in this booth.

The booth will be located at United Technologies existing aircraft assembly facility which is 20 miles northwest of West Palm Beach on State Road 710 (Beeline Highway) in Palm Beach County.

The UTM coordinates of this facility are Zone 17, 567.5 km E and 2975 km N.

The construction shall be in accordance with attached permit application, plans, documents, and drawings except as noted in the Specific Conditions of this permit.

**Attachments are as follows:**

1. Application to Construct Air Pollution Source, DER form 17-2.202(1), dated December 5, 1985.
2. DER letter dated January 6, 1986.
3. United Technologies letter dated February 6, 1986.
4. United Technologies letter dated May 5, 1986.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.



PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD).
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. The spray booth is authorized to operate as many hours as necessary provided conditions 5, 6, and 7 are complied with.
2. The booth shall not be used unless the ventilation system and filter are operating properly.
3. The company shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
4. Visible emissions shall not exceed 5 percent opacity (6 minute average) as determined by Method 9 which is described in 40 CFR 60, Appendix A, from any part of the booth.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: December 31, 1986

SPECIFIC CONDITIONS:

5. Production shall not exceed 80 aircraft per year without prior approval from Central Air Permitting.
6. Daily emissions of VOC shall not exceed 15 lbs/day and 3 lbs/hr. Annual emissions shall not exceed 1.7 TPY.
7. Permittee is limited to using no more than 2.7 gals/day of any combination of lacquer, thinner and paint in any given day and no more than .54 gals/hr of any combination.
8. The company shall actively seek low solvent coatings (less 3.5 lb VOC/gallon coating) as a replacement for the varnish and lacquer now used in this operation.
9. The permittee shall demonstrate compliance with the conditions of this construction permit and submit a complete application for permit to operate to the Southeast Florida District office at least 90 days prior to the December 31, 1986, expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this construction permit until its expiration date.
10. Any permit to operate issued for the booth shall require an annual operation report which includes, as a minimum, the number of aircraft painted in any given 24 hour period and during the year, the calculated daily hourly, and annual VOC emissions based upon actual usages, and the results of the study to locate a substitute low solvent coating for this operation.

Issued this 29 day of July,  
1986.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
VICTORIA J. TSCHINKEL, Secretary

\_\_\_ pages attached.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

PERMITTEE:  
United Technologies Corp.  
P. O. Box 2691  
West Palm Beach, FL 33402

Permit Number: AC 50-113784  
Expiration Date: December 31, 1986  
County: Palm Beach County  
Latitude/Longitude: 26° 54' 19" N  
81° 19' 08" W  
Project: Auto Spray Booth  
(PS-15-SIK)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application(s) and approved drawings plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Installation of Binks Auto Spray Booth (Model No. AA-530) with an Andreae paint arrester exhaust filter (Model No. AF-530). Exterior components for aircraft are painted in this booth.

The booth will be located at United Technologies existing aircraft assembly facility which is 20 miles northwest of West Palm Beach on State Road 710 (Beeline Highway) in Palm Beach County.

The UTM coordinates of this facility are Zone 17, 567.5 km E and 2975 km N.

The construction shall be in accordance with attached permit application, plans, documents, and drawings except as noted in the Specific Conditions of this permit.

**Attachments are as follows:**

1. Application to Construct Air Pollution Source, DER form 17-2.202(1), dated December 5, 1985.
2. DER letter dated January 6, 1986.
3. United Technologies letter dated February 6, 1986.
4. United Technologies letter dated May 5, 1986.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD).
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.



PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. The spray booth shall is authorized to operate continuously, as many hours as necessary, provided conditions 5, 6, and 7 are complied with.
2. The booth shall not be used unless the ventilation system and filter are operating properly.
3. The company shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
4. Visible emissions shall not exceed 5 percent opacity (6 minute average) as determined by Method 9 which is described in 40 CFR 60, Appendix A, from any part of the booth.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: December 31, 1986

SPECIFIC CONDITIONS:

5. Production shall not exceed 80 aircraft per year without prior approval from Central Air Permitting.
6. No more than 3 aircraft can be painted during any 24 hour period.
7. VOC emissions cannot exceed 243.5 lbs/day and 3.25 tons per year based upon conditions 5 and 6.
8. The company shall actively seek low solvent coatings (less 3.5 lbs VOC/gallon coating) as replacement for the paint now used in this operation.
9. The permittee shall demonstrate compliance with the conditions of this construction permit and submit a complete application for permit to operate to the Southeast Florida District office at least 90 days prior to the December 31, 1986, expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this construction permit until its expiration date.
10. Any permit to operate issued for the booth shall require an annual operation report which includes, as a minimum, the number of aircraft painted in any given 24 hour period and during the year, the calculated daily and annual VOC emissions, and the results of the study to find a substitute low solvent coating for this operation.

Issued this 29 day of July,  
1986.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
VICTORIA J. TSCHINKEL, Secretary

\_\_\_ pages attached.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

PERMITTEE:  
United Technologies Corp.  
P. O. Box 2691  
West Palm Beach, FL 33402

Permit Number: AC 50-113785  
Expiration Date: December 31, 1986  
County: Palm Beach County  
Latitude/Longitude: 26° 54' 19" N  
81° 19' 08" W  
Project: Work Table (DC-4-SIK)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application(s) and approved drawings plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Construction a 12 x 2.5 foot downdraft work table equipped with a dust collection system consisting of ducts, an Aget 80 E 70 exhauster, and a FH 58-2D baghouse. Interior wood components for aircraft are prepared by woodworking, sanding and rubbing down on the work table. The work table will be located at United Technologies existing aircraft assembly facility which is 20 miles northwest of West Palm Beach on State Road 710 (Beeline Highway) in Palm Beach County. The UTM coordinates of this facility are zone 17, 567.5 km E and 2975 km N.

The construction shall be in accordance with attached permit application, plans, documents, and drawings except as noted in the Specific Conditions of this permit.

**Attachments are as follows:**

1. Application to Construct Air Pollution Source, DER form 17-2.202(1), dated December 5, 1985.
2. DER letter dated January 6, 1986.
3. United Technologies letter dated February 6, 1986.
4. United Technologies letter dated May 5, 1986.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD).
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: December 31, 1986

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
  - the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. The work table is authorized to operate continuously, 8760 hours per year.
2. The work table shall not be used to finish wood components unless the dust collection system is operating properly.
3. Any leaks in the system that allows dust to be discharged without filtration shall be repaired promptly.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: December 31, 1986

SPECIFIC CONDITIONS:

4. Visible emissions shall not exceed 5 percent opacity (6 minute average), as determined by EPA Method 9 which is described in 40 CFR 60, Appendix A, from any part of the work table and dust collection system.

5. Production shall not exceed 80 aircraft per year without prior approval from Central Air Permitting.

6. The permittee shall demonstrate compliance with the conditions of this construction permit and submit a complete application for permit to operate to the Southeast Florida District office at least 90 days prior to the December 31, 1986, expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this construction permit until its expiration date.

Issued this 29 day of July,  
1986.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
VICTORIA J. TSCHINKEL, Secretary

\_\_\_\_\_ pages attached.



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION



# Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: \_\_\_\_\_ LOCTN: \_\_\_\_\_  
To: \_\_\_\_\_ LOCTN: \_\_\_\_\_  
To: \_\_\_\_\_ LOCTN: \_\_\_\_\_  
FROM: \_\_\_\_\_ DATE: \_\_\_\_\_

TO: Victoria J. Tschinkel

FROM: *for* Clair Fancy *[Signature]*

DATE: July 25, 1986

SUBJ: Approval of Air Construction Permits

Attached for your approval and signature are three air construction permits to United Technologies Corporation to construct a work table and two spray booths at the applicant's facility in Palm Beach County, Florida.

Day 90, after which the permits would be issued by default, is August 3, 1986.

The Bureau recommends your approval and signature.

CF/pa

Attachment

**RECEIVED**

JUL 28 1986

Office of the Secretary

Check Sheet

Company Name: United Technologies  
Permit Number: AC 50-113559, 113784, J-113785  
PSD Number: \_\_\_\_\_  
Permit Engineer: \_\_\_\_\_

**Application:**

- |  |                          |
|--|--------------------------|
| <input checked="" type="checkbox"/> Initial Application    | Cross References:        |
| <input checked="" type="checkbox"/> Incompleteness Letters | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Responses              | <input type="checkbox"/> |
| <input type="checkbox"/> Waiver of Department Action       | <input type="checkbox"/> |
| <input type="checkbox"/> Department Response               |                          |
| <input type="checkbox"/> Other                             |                          |

**Intent:**

- Intent to Issue
  - Notice of Intent to Issue
  - Technical Evaluation
  - BACT or LAER Determination
  - Unsigned Permit
- Correspondence with:
- EPA
  - Park Services
  - Other
- Proof of Publication
    - Petitions - (Related to extensions, hearings, etc.)
    - Waiver of Department Action
    - Other

**Final**

**Determination:**

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

**Post Permit Correspondence:**

- Extensions/Amendments/Modifications
- Other



DER

P. O. Box 2691  
West Palm Beach, Florida 33402  
305/840-2000

JUN 6 1986

BAQM

Government Products Division

June 3, 1986

Mr. C. H. Fancy, Deputy Chief  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301-8241

Re: Sikorsky Paint Spray Booths and Dust Collector  
File Nos. AC 50-113559, AC 50-113784 and AC 50-113785

Dear Mr. Fancy:

We have reviewed the revised Technical Evaluation and Preliminary Determination and proposed permits for the above air sources. While the proposed permits are correct, there is a typographical error in the Technical Evaluation and Preliminary Determination which should be corrected. In the table on page 2 the VOC emission numbers (lbs/day and tons/yr) for the Floor Type Spray Booth and the Auto Spray Booth have been transposed. The table should read as follows:

Source	Lb VOC/Day	TPY/VOC
Work Bench	0	0
Floor Type Spray Booth	15	1.7
Auto Spray Booth	243.5	3.3

Your help in correcting the error is appreciated. Should you have any questions, please do not hesitate to call me at 305/840-5661 or Lisa Hill at 305/840-5655.

Sincerely,

J. L. Seelinger, Manager  
Utilities Operations/Environmental Affairs

JLS/LKH/fo/4788



P. O. Box 2691  
West Palm Beach, Florida 33402  
305/840-2000

Government Products Division

June 3, 1986

DER  
JUN 5 1986  
BAQM

C. H. Fancy, Deputy Chief  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301-8241

Re: Proof of Publication - Sikorsky Paint Spray Booths  
File Nos. AC 50-113559, AC 50-113784 and AC 50-113785

Dear Mr. Fancy:

As required, attached is Proof of Publication of the Notice of Intent  
in connection with the above subject matter.

Sincerely,

A handwritten signature in cursive script that reads "J. L. Seelinger".

J. L. Seelinger, Manager  
Utilities Operations/Environmental Affairs

JLS/fo/4812  
Attachment

cc: M. Armstrong  
G. Fatovic  
R. Henson

# THE PALM BEACH POST

Published Daily and Sunday  
West Palm Beach, Palm Beach County, Florida

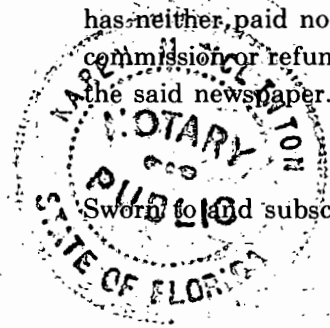
## PROOF OF PUBLICATION

STATE OF FLORIDA  
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared Barbara M. McCord  
who on oath says that she/he is Class. Adv. Mgr. of The Palm Beach Post,  
a daily and Sunday newspaper published at West Palm Beach in Palm Beach County,  
Florida; that the attached copy of advertising, being a Notice

in the matter of           intent            
in the           --           Court, was published in said newspaper in  
the issues of           May 29, 1986          

Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



Sworn to and subscribed before me this 29 day of May A.D. 19 86

*Barbara M. McCord*

*Karen M. Minton*

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXP. NOV 15, 1988  
BONDED THRU GENERAL INS. UND.

NO. 642945  
State of Florida  
Department of  
Environmental Regulation  
Notice of Intent  
The Department gives notice of its intent to issue permits to United Technologies Corporation for the construction of a work table and two spray booths at their aircraft assembly facility located 20 miles northwest of West Palm Beach on S.R. 710 in Palm Beach County, Florida. Emissions from the spray booths will be approximately 5 TPY VOC. A determination of best available control technology (BACT) was not required. Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.  
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes. The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:  
Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301  
Dept. of Environmental Regulation  
Southeast Florida District  
3301 Gun Club Road  
West Palm Beach, Florida 33402  
Palm Beach County  
Health Department  
901 Evernia Street  
West Palm Beach, Florida 33402  
Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.  
Pub: The Post  
May 29, 1986

**BEST AVAILABLE COPY**

place on the  
 prevent this card from  
 urn receipt fee will provide  
 delivered to and the date of  
 the following services are  
 master for fees and check box(es)

to whom, date and address of delivery.

Restricted Delivery.

3. Article Addressed to:  
 Mr. R. H. Henson  
 United Technologies Corp.  
 P. O. Box 1621  
 West Palm Beach, FL 33402

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 408 532 006

Always obtain signature of addressee or agent and DATE DELIVERED.

DOMESTIC RETURN RECEIPT

5. Signature - Addressee

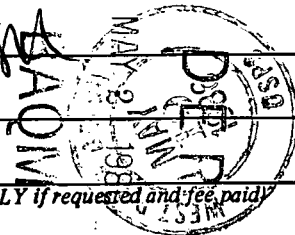
X

6. Signature - Agent

X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)



P 408 532 006

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—  
 NOT FOR INTERNATIONAL MAIL

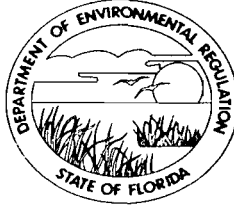
(See Reverse)

PS Form 3800, Feb. 1982

Sent to	
Mr. R. H. Henson	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
5/16/86	

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

May 16, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. R. H. Henson  
Manager - Plant Engineering  
United Technologies Corporation  
Post Office Box 1621  
West Palm Beach, Florida 33402

*Called Mr. Selinger  
5/16/86 to tell  
him. Revised TE  
mailed today  
PA*

Dear Mr. Henson:

Attached is one copy of the Revised Technical Evaluation and Preliminary Determination, and proposed permits to construct a work table and two spray booths at the Sikorsky aircraft assembly facility near West Palm Beach, Florida.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/pa

Attachments

cc: Isidore Goldman  
Gene Sacco

State of Florida  
Department of Environmental Regulation  
Notice of Intent

The Department gives notice of its intent to issue permits to United Technologies Corporation for the construction of a work table and two spray booths at their aircraft assembly facility located 20 miles northwest of West Palm Beach on S.R. 710 in Palm Beach County, Florida. Emissions from the spray booths will be approximately 5 TPY VOC. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.



The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Dept. of Environmental Regulation  
Southeast Florida District  
3301 Gun Club Road  
West Palm Beach, Florida 33402

Palm Beach County Health Department  
901 Evernia Street  
West Palm Beach, Florida 33402

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

United Technologies Corporation  
Post Office Box 1621  
West Palm Beach, Florida 33402

---

DER File No. AC 50-113559  
AC 50-113784  
AC 50-113785

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue permits (copies attached) for the proposed project as detailed in the applications specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Revised Technical Evaluation and Preliminary Determination.

The applicant, United Technologies Corporation, applied on December 9, 1985, to the Department of Environmental Regulation for permits to construct two new paint spray booths and a work table at the applicant's aircraft assembly facility in Palm Beach County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits were needed for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit application. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32301-8241. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

Copies furnished to:

Mr. R. H. Henson, United Technologies Corporation  
Mr. Isidore Goldman, DER Southeast Florida District  
Mr. Gene Sacco, Palm Beach County Health Department

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on May 16, 1986.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Patricia G. Adams May 16, 1986  
Clerk Date

RULES OF THE ADMINISTRATIVE COMMISSION  
MODEL RULES OF PROCEDURE  
CHAPTER 28-5  
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
  - (a) The name and address of each agency affected and each agency's file or identification number, if known;
  - (b) The name and address of the petitioner or petitioners;
  - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
  - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
  - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
  - (f) A demand for the relief to which the petitioner deems himself entitled; and
  - (g) Such other information which the petitioner contends is material.

DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103

of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to an administrative determination (hearing) under Section 120.57, F.S.

(4) Notice to substantially affected persons concerning applications for Department permits is an essential and integral part of the state environmental licensing process. Therefore, no application for a permit for which publication of notice is required shall be granted until and unless proof of publication of Notice is furnished to the appropriate Department permitting office.

(5)(a) Any applicant or person benefiting from the Department's action may elect to publish notice of proposed agency action in the manner provided by subsection (2) or (3). Any person who elects to publish notice of proposed agency action, upon presentation of proof of publication to the Department, prior to final agency action, shall be entitled to the same benefits under this rule as a person who is required to publish notice of proposed agency action. Since persons whose substantial interests are affected by a Department decision on a permit application may petition for an administrative proceeding within fourteen (14) days after receipt of notice and since, unless notice is given or published as prescribed in this rule, receipt of notice can occur at any time, the applicant or persons benefiting from the Department's action cannot justifiably rely on the finality of

the Department's decision without the notice having been duly given or published.

(b) The notices required by this rule may be combined with other notices required by the Department pursuant to Chapter 403, 376, or 253, F.S., or Chapter 17, FAC.

(c) The provisions of this section shall also apply to the permitting of hazardous waste facilities, but only to the extent it is consistent with Chapter 17-30, Part IV, FAC. Whenever Chapter 17-30, Part IV, FAC, provides for a different time or notice procedure than that set forth in this section the time and notice provisions of Chapter 17-30 shall govern.

(6) Failure to publish any notice of application, notice of proposed agency action, or notice of agency action required by the Department shall be an independent basis for the denial of a permit.

Specific Authority: 120.53, 403.0876, 403.815, F.S. Law Implemented: 120.53, F.S. History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

**17-103.155 Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.**

(1)(a) Any person whose substantial interests may be affected by proposed or final agency action may file a petition for administrative proceeding. A petition shall be in the form required by this Chapter and Chapter 28-5, FAC, and shall be filed (received) in the Office of General Counsel of the Department within fourteen (14) days of receipt of notice of proposed agency action or within fourteen (14) days of receipt of notice of

17-103.150(3)(d) -- 17-103.155(1)(a)

DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103

agency action whenever there is no public notice of proposed agency action. In addition to the requirements of Rule 28-5.201, FAC, the Petition must specify the county in which the project is or will be located.

(b) Failure to file a petition within fourteen (14) days of receipt of notice of agency action or fourteen (14) days of receipt of notice of proposed agency action, whichever notice first occurs, shall constitute a waiver of any right to request an administrative proceeding under Chapter 120, F.S.

(c) When there has been no publication of notice of agency action or notice of proposed agency action as prescribed in Rule 17-103.150, FAC, a person who has actual knowledge of the agency action or has knowledge which would lead a reasonable person to conclude that the Department has taken final agency action, has a duty to make further inquiry within fourteen (14) days of obtaining such knowledge by contacting the Department to ascertain whether action has occurred. The Department shall upon receipt of such an inquiry, if agency action has occurred, promptly provide the person with notice as prescribed by Rule 17-103.150, FAC. Failure of the person to make inquiry with the Department within fourteen (14) days after obtaining such knowledge may estop the person from obtaining an administrative proceeding on the agency action.

(2)(a) "Receipt of notice of agency action" means receipt of written notice of final agency action, as prescribed by Department rule, or the publication, pursuant to Department rule, of notice of final agency action, whichever first

occurs.

(b) "Receipt of notice of proposed agency action" means receipt of written notice (such as a letter of intent) that the Department proposes to take certain action, or the publication pursuant to Department rule of notice of proposed agency action, whichever first occurs.

(3) Notwithstanding any other provision in this Chapter, should a substantially affected person who fails to timely request a hearing under Section 120.57, F.S., administratively appeal the final Department action or order, the record on appeal should be limited to:

(a) the application, and accompanying documentation submitted by the applicant prior to the issuance of the agency's intent to issue or deny the requested permit.

(b) the materials and information relied upon by the agency in determining the final agency action or order;

(c) any notices issued or published; and

(d) the final agency action or order entered concerning the permit application.

(4) In such cases where persons do not timely exercise their rights accorded by Section 120.57(1), Florida Statutes, the allegations of fact contained in or incorporated by the final agency action shall be deemed uncontested and true, and appellants may not dispute the truth of such allegations upon subsequent appeal.

(5) Any applicant may challenge the Department's request for additional information by filing with the Office of General Counsel an appropriate petition for administrative proceeding pursuant to Section 120.60, F.S., following receipt by

the applicant of the Department's notification, pursuant to Section 403.0876, F.S., that additional information is required.

Specific Authority: 120.53, 403.0876, 403.815, F.S. Law

Implemented: 120.53, F.S.

History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

**17-103.160 Uniformity in Approval and Denial of Applications for Department Permits and Certifications.** To the extent possible and consistent with the public interest, the Department approves and denies applications for permits and certifications on a uniform and consistent basis. Final Department actions on applications for permits and certifications shall be consistent with prior Department actions, unless deviation therefrom is explained by the Department in writing or the hearing officer who submits a recommended order to the Department for final agency action in accordance with Section 120.57, Florida Statutes.

Specific Authority: 120.53(1), F.S. Law Implemented: 120.53(1), 120.68(12), F.S. History: New 2-6-78, Transferred from 17-1.63, 6-1-84.

**17-103.170 Designation, Preparation and Transmittal of Record for Administrative Appeals.**

When any Department action or order is the subject of an administrative appeal under Chapter 17-103, Part II, FAC, the following requirements shall apply:

(1) Designation of Record. Within fifteen (15) days of rendition of the Department's final order, the appellant shall designate

to the Department, in writing, with copies to other parties, those documents or things under the control of or in the possession of the Department which the appellant desires to have included in the record, and which were received or considered in the Department proceeding below. If a proceeding was reported by mechanical recording devices, the appellant shall designate those portions of the proceeding for which it requires written transcription or tapes for transcription. Any other party may designate other portions of the record in the manner provided herein. Such cross-designation shall be filed with the Department, with copies provided other parties, within seven (7) days after receipt of the designation by the appellant.

(2) Original Record. The Department shall thereupon include in the record all of the designated portions of the original papers and exhibits in the proceedings or matter from which administrative appeal is taken, together with a copy of any such parts of the proceedings as were stenographically reported or transcribed from tapes, and as have been designated by the parties and certified by a notary public, the reporter, or other officer for inclusion in the record on appeal or review, and certified copies of the order, if any, of which review is sought. The Department may, at its discretion, substitute certified copies for original papers or documents in its possession.

(3) Preparation of Record. Upon tender or deposit by appellant of the estimated cost of preparation, the Department shall prepare the record in accordance with the designations of the parties. The cost of preparation, and reproduction,



Revised  
Technical Evaluation  
and  
Preliminary Determination

United Technologies Corporatation  
West Palm Beach, Florida  
Palm Beach County

<u>Source</u>	<u>File Number</u>
Floor Type Spray Booth	AC 50-113559
Auto Spray Booth	AC 50-113784
Work Table	AC 50-113785

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

May 16, 1986

## I. Application

### A. Applicant

United Technologies Corporation  
Post Office Box 2691  
West Palm Beach, Florida 33402

### B. Request

On December 9, 1985, Mr. J. L. Seelinger, Manager of Environmental Affairs, submitted an application for a permit to construct three air pollution sources at the company's aircraft assembly facility (SIC 3721). The application was considered complete on February 19, 1986, when additional information on the proposed sources was received. After receiving the March 27, 1986, Technical Evaluation and Preliminary Determination, Mr. J. L. Seelinger called a number of DER people in Tallahassee to object to some of the permit conditions. It was agreed that the public notice would not be published and that he would respond to various concerns. The company's response was received by Central Air Permitting on May 6, 1986.

### C. Project and Location

The applicant proposes to install two new paint spray booths and a work table at the aircraft assembly facility that is located 20 miles northwest of West Palm Beach on State Road 710 (Beeline Highway) in Palm Beach County. The UTM coordinates of this facility are zone 17, 567.5 km E and 2975 km N. Interior components will be prepared on the work bench and interior and exterior aircraft parts will be surface coated in the two paint spray booths. The preparation and surface coating operations that will occur in the proposed sources are currently being performed in existing sources at this plant. No increase in the production of aircraft as a result of the new sources is being considered at this time, but the permits would allow some increases.

### D. Air Pollution Emissions

Aircraft components are shipped to this facility where they are assembled, painted, and tested. The current production rate is 36 aircraft per year.

The three new sources being reviewed are a work table (file no. AC 50-113785), a floor type spray booth (file no. AC 50-113559), and an auto spray booth (file no. AC 50-113784). Company designations for this equipment are DC-4-SIK, PS-14-SIK, and PS-15-SIK, respectively.

On the work table, wood components for the interior of the aircraft will be finished and prepared for coating. Air

(3000-7250 SCFM) containing dust generated by this operation will be filtered through a Aget 80 E 70 dust collector before being discharged to the atmosphere. The dust collector's efficiency and particulate matter emission rate are estimated at 95 percent and 0.03 lb/hr.

Lacquer or varnish will then be applied to the finished wood components in a Binks floor type spray booth equipped with an Andreae paper filter. The ventilation rate for this booth will be 7,400 SCFM. The filter will effectively remove particulate matter but allow the volatile organic compounds (VOC) from the coating operation to escape. The VOC emissions from the booth will be a direct function of the quantity of solvent used in the coating. VOC emissions are estimated to be less than 1.7 TPY. The bases of this estimate are: the components for each aircraft require 7-12 days to coat; the use of 3.3 gallons of varnish or lacquer per aircraft; the use of 3.2 gallons of thinner for diluting the varnish or lacquer per aircraft; and the use of one gallon of thinner per day for clean up of which 80 percent of this thinner is recovered and stored in drums.

Exterior components of the aircraft (approximately 10 percent of each aircraft) will be painted in the Binks auto spray booth that is equipped with Andreae filters. The ventilation rate for the booth will be 12,200 SCFM. Again, particulate matter will be trapped by the filters but the VOC emissions from the paint, thinner, and solvent will escape. These emissions are estimated at 3.25 TPY.

The following table lists the maximum VOC emissions from the proposed equipment.

Source	lb VOC/day	TPY VOC
Work Bench	0	0
Floor Type Spray Booth	243.5	3.3
Auto Spray Booth	15	1.7

VOC emissions from the existing booth will be reduced by a similar amount after the new booths are in operation. The total VOC emissions from the facility will not change as result of the new sources.

## II. Rule Applicability

### A. State Regulations

The proposed projects, installation of a work bench and two spray booths at an existing aircraft assembly plant, are subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code.

The sources will be located in area designated nonattainment for ozone (17-2.410) and attainment for the other criteria pollutants (17-2.420).

The plant is a major facility because VOC emissions exceed 100 TPY. However, the increase in emissions resulting from the proposed projects are less than the significant emission rate for VOC of 40 TPY as listed in Table 500-2, Regulated Air Pollutants-Significant Emission Rates.

The projects are not subject to the prevention of significant deterioration regulations (17-2.500) and new source review for nonattainment areas (17-2.510) because the modification does not result in a significant emission increase of any criteria pollutant (17-2.500(2)(d)4.a(iii) and 17-2.510(2)(d)4.a.).

The floor type spray booth (PS-14-SIK) is not subject to reasonably available control technology (17-2.650) because the emissions from painting inside parts and certain outside parts (rescue hoists and search lights) will not exceed 3 pounds per hour or 15 pounds per day of VOC emissions (17-2.650(1)(c)1.). The auto spray type spray booth (PS-15-SIK) is exempt from reasonably available control technology because the painting of aircraft exteriors, and helicopters are considered aircraft by the department, is exempt from the RACT rules (17-2.650(1)(f)14.a.(ii)G. The CTG document on miscellaneous metal parts coating state, "Exterior coatings on airplanes...are high performance coatings which are applied under conditions that are not easily controlled. However, parts for the exterior of airplanes...that are coated as a separate manufacturing or coating operation are intended to be covered by this regulation." The department has determined that, since the helicopters are fully assembled (including cowlings, doors, drive shaft covers, and panels) when they enter the painting area, that these are considered parts of the fuselage and are exempt from RACT. However outside parts that are later added (including rescue hoists and search lights) are not exempt.

The project will be reviewed under 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements. The VOC emission standards shall be based on the RACT regulation exemptions (17-2.650(1)(c)1.) and (17-2.650(1)(f)14.a.(ii)G.). Higher emissions could subject these modifications to review under other regulations.

#### B. Federal Regulations

The proposed projects, minor modifications to a major source, are not subject to review under federal regulations because the modification will not result in a significant net emissions increase of any criteria pollutant.

### III. Technical Evaluation

#### A. Work Tables (DC-4-SIK)

Fugitive dust generated by sanding wood components on the work table will be captured by a 95-99 percent efficient baghouse. Control of the unconfined particulate matter emissions from this source with a baghouse is considered to be reasonable precautions. Maximum particulate matter emissions from this source will be approximately 0.03 lb/hr, after control.

The department will set an opacity standard of no visible emissions for the source to confirm that the baghouse is being properly operated and maintained.

#### B. Floor Type Spray Booth (PS-14-SIK)

The 7,400 SCFM of ventilation air for this booth will pass through a filter before being exhausted to the atmosphere. The spray particles will be removed by the filter allowing only the VOC emissions to be exhausted to the atmosphere. The company estimates that no more than 264 gallons/year of varnish or lacquer and no more than 256 gallons of thinner will be used initially to paint interior parts for 80 aircraft (the maximum number of helicopters that will be painted at this source). VOC emissions, which includes thinner used for equipment cleaning, are estimated to be 1.7 TPY for this booth. Air pollution controls are not justified for this low rate of VOC emissions. They are allowed up to 3 lb/hr and 15 lb/day without being required to use low solvent coatings or incineration.

#### C. Auto Spray Booth (PS-15-SIK)

The 12,200 SCFM of ventilation air for the booth will pass through a filter before being exhausted to the atmosphere. Paint particles and VOC fumes will be present in the booth. The paint spray particles will be removed by the filter and the VOC fumes will pass through the filter and be exhausted to the atmosphere.

Exterior components for a maximum of 80 aircraft will be painted with 320 gallons of paint, and 400 gallons of primer in this booth. Also, two gallons of thinner per aircraft, of which 20 percent escapes to the atmosphere, will be used to clean the painting equipment and 3 gallons per aircraft of thinner will be used to clean the aircraft. Total VOC emission from the booth are estimated at 3.25 TPY.

Air pollution controls are not justified for this low VOC emission rate. As airplane (helicopter) exterior coatings are exempt from RACT, the facility is allowed up to 40 tons per year before LAER would be required.

#### IV. Air Quality Analysis

The proposed modifications will not result in a significant net emissions increase of air pollutants as set forth in Rule 17-2.500(2)(e)2., FAC. Therefore, no air quality analysis is required by the regulations. As the net emissions from the facility are basically unchanged by the addition of the three new sources, no change in ambient air quality is expected to result from the new sources.

#### V. Conclusion

Based on the data submitted by United Technologies Corporation, the department has concluded that the construction and operation of the work table and two spray booths will be in compliance with the state regulations. The General and Specific Conditions of these permits will assure compliance of the new sources with the air pollution control regulations.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

**PERMITTEE:**  
United Technologies Corp.  
P. O. Box 2691  
West Palm Beach, FL 33402

Permit Number: AC 50-113785  
Expiration Date: November 15, 1986  
County: Palm Beach County  
Latitude/Longitude: 26° 54' 19" N  
81° 19' 08" W  
Project: Work Table (DC-4-SIK)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application(s) and approved drawings plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Construction a 12 x 2.5 foot downdraft work table equipped with a dust collection system consisting of ducts, an Aget 80 E 70 exhauster, and a FH 58-2D baghouse. Interior wood components for aircraft are prepared by woodworking, sanding and rubbing down on the work table. The work table will be located at United Technologies existing aircraft assembly facility which is 20 miles northwest of West Palm Beach on State Road 710 (Beeline Highway) in Palm Beach County. The UTM coordinates of this facility are zone 17, 567.5 km E and 2975 km N.

The construction shall be in accordance with attached permit application, plans, documents, and drawings except as noted in the Specific Conditions of this permit.

**Attachments are as follows:**

1. Application to Construct Air Pollution Source, DER form 17-2.202(1), dated December 5, 1985.
2. DER letter dated January 6, 1986.
3. United Technologies letter dated February 6, 1986.
4. United Technologies letter dated May 5, 1986.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: November 15, 1986

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.



PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: November 15, 1986

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: November 15, 1986

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD).
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: November 15, 1986

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
  - the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. The work table is authorized to operate continuously, 8760 hours per year.
2. The work table shall not be used to finish wood components unless the dust collection system is operating properly.
3. Any leaks in the system that allows dust to be discharged without filtration shall be repaired promptly.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: November 15, 1986

**SPECIFIC CONDITIONS:**

4. Visible emissions shall not exceed 5 percent opacity (6 minute average), as determined by EPA Method 9 which is described in 40 CFR 60, Appendix A, from any part of the work table and dust collection system.

5. Production shall not exceed 80 aircraft per year without prior approval from Central Air Permitting.

6. The permittee shall demonstrate compliance with the conditions of this construction permit and submit a complete application for permit to operate to the Southeast Florida District office at least 90 days prior to the November 15, 1986, expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this construction permit until its expiration date.

Issued this \_\_\_\_ day of \_\_\_\_\_,  
19\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
VICTORIA J. TSCHINKEL, Secretary

\_\_\_\_ pages attached.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

**PERMITTEE:**  
United Technologies Corp.  
P. O. Box 2691  
West Palm Beach, FL 33402

Permit Number: AC 50-113559  
Expiration Date: November 15, 1986  
County: Palm Beach County  
Latitude/Longitude: 26° 54' 19" N  
81° 19' 08" W  
Project: Floor Type Spray Booth  
(PS-14-SIK)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application(s) and approved drawings plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Installation of a Binks floor type spray booth (Model No. PFA-8-7-T-LH) equipped with an Andraea filter. Interior wood components for aircraft are coated with varnish or lacquer in this booth.

The booth will be located at United Technologies existing aircraft assembly facility which is 20 miles northwest of West Palm Beach on State Road 710 (Beeline Highway) in Palm Beach County.

The UTM coordinates of this facility are Zone 17, 567.5 km E and 2975 km N.

The construction shall be in accordance with attached permit application, plans, documents, and drawings except as noted in the Specific Conditions of this permit.

**Attachments are as follows:**

1. Application to Construct Air Pollution Source, DER form 17-2.202(1), dated December 5, 1985.
2. DER letter dated January 6, 1986.
3. United Technologies letter dated February 6, 1986.
4. United Technologies letter dated May 5, 1986.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: November 15, 1986

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: November 15, 1986

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: November 15, 1986

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD).
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.



**PERMITTEE:**  
United Technologies Corp.

**Permit Number:** AC 50-113559  
**Expiration Date:** November 15, 1986

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
  - the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

- 1. The spray booth is authorized to operate as many hours as necessary provided conditions 5, 6, and 7 are complied with.
- 2. The booth shall not be used unless the ventilation system and filter are operating properly.
- 3. The company shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
- 4. Visible emissions shall not exceed 5 percent opacity (6 minute average) as determined by Method 9 which is described in 40 CFR 60, Appendix A, from any part of the booth.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: August 15, 1986

**SPECIFIC CONDITIONS:**

5. Production shall not exceed 80 aircraft per year without prior approval from Central Air Permitting.
6. Daily emissions of VOC shall not exceed 15 lbs/day and 3 lbs/hr. Annual emissions shall not exceed 1.7 TPY.
7. Permittee is limited to using no more than 2.7 gals/day of any combination of lacquer, thinner and paint in any given day and no more than .54 gals/hr of any combination.
8. The company shall actively seek low solvent coatings (less 3.5 lb VOC/gallon coating) as a replacement for the varnish and lacquer now used in this operation.
9. The permittee shall demonstrate compliance with the conditions of this construction permit and submit a complete application for permit to operate to the Southeast Florida District office at least 90 days prior to the November 15, 1986, expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this construction permit until its expiration date.
10. Any permit to operate issued for the booth shall require an annual operation report which includes, as a minimum, the number of aircraft painted in any given 24 hour period and during the year, the calculated daily hourly, and annual VOC emissions based upon actual usages, and the results of the study to locate a substitute low solvent coating for this operation.

Issued this \_\_\_\_\_ day of \_\_\_\_\_,  
19\_\_\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

---

VICTORIA J. TSCHINKEL, Secretary

\_\_\_\_\_ pages attached.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

**PERMITTEE:**  
United Technologies Corp.  
P. O. Box 2691  
West Palm Beach, FL 33402

Permit Number: AC 50-113784  
Expiration Date: November 15, 1986  
County: Palm Beach County  
Latitude/Longitude: 26° 54' 19" N  
81° 19' 08" W  
Project: Auto Spray Booth  
(PS-15-SIK)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application(s) and approved drawings plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Installation of Binks Auto Spray Booth (Model No. AA-530) with an Andraee paint arrester exhaust filter (Model No. AF-530). Exterior components for aircraft are painted in this booth.

The booth will be located at United Technologies existing aircraft assembly facility which is 20 miles northwest of West Palm Beach on State Road 710 (Beeline Highway) in Palm Beach County.

The UTM coordinates of this facility are Zone 17, 567.5 km E and 2975 km N.

The construction shall be in accordance with attached permit application, plans, documents, and drawings except as noted in the Specific Conditions of this permit.

**Attachments are as follows:**

1. Application to Construct Air Pollution Source, DER form 17-2.202(1), dated December 5, 1985.
2. DER letter dated January 6, 1986.
3. United Technologies letter dated February 6, 1986.
4. United Technologies letter dated May 5, 1986.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: November 15, 1986

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: November 15, 1986

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: November 15, 1986

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD).
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: November 15, 1986

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
  - the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. The spray booth shall is authorized to operate continuously, as many hours as necessary, provided conditions 5, 6, and 7 are complied with.
2. The booth shall not be used unless the ventilation system and filter are operating properly.
3. The company shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
4. Visible emissions shall not exceed 5 percent opacity (6 minute average) as determined by Method 9 which is described in 40 CFR 60, Appendix A, from any part of the booth.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: November 15, 1986

**SPECIFIC CONDITIONS:**

5. Production shall not exceed 80 aircraft per year without prior approval from Central Air Permitting.
6. No more than 3 aircraft can be painted during any 24 hour period.
7. VOC emissions cannot exceed 243.5 lbs/day and 3.25 tons per year based upon conditions 5 and 6.
8. The company shall actively seek low solvent coatings (less 3.5 lbs VOC/gallon coating) as replacement for the paint now used in this operation.
9. The permittee shall demonstrate compliance with the conditions of this construction permit and submit a complete application for permit to operate to the Southeast Florida District office at least 90 days prior to the November 15, 1986, expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this construction permit until its expiration date.
10. Any permit to operate issued for the booth shall require an annual operation report which includes, as a minimum, the number of aircraft painted in any given 24 hour period and during the year, the calculated daily and annual VOC emissions, and the results of the study to find a substitute low solvent coating for this operation.

Issued this \_\_\_\_ day of \_\_\_\_,  
19\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

\_\_\_\_ pages attached.





P. O. Box 2691  
West Palm Beach, Florida 33402  
305/840-2000

Government Products Division

May 5, 1986

Mr. Clair Fancy  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301

DER  
MAY 6 1986  
BAQM

Re: Proposed Permit No. AC 50-113559  
AC 50-113784  
AC 50-113785

Dear Mr. Fancy:

Based on our conversations of May 2, revised calculations to reflect the paint usages in the booths for the applications earlier submitted are attached. These calculations reflect updated paint usage figures received from Sikorsky at the end of April.

Based on our conversations, it is our understanding that the exterior painting of the fuselage of a helicopter is exempt from Reasonably Available Control Technology (RACT) limitations. It is further our understanding that painting of fuselage panels, which are assembled on the aircraft and are removed from the assembled body for painting purposes, including cowelings, doors, drive shaft covers, and panels are also exempt from RACT limitations.

During our conversations two parts were identified which did not fall within the exempt category. They were rescue hoists and hi-intensity search lights. Typically, very few of our helicopters have rescue hoists and search lights on them, however, to ensure compliance, these two parts will be painted in the interior booth, and this will be subject to RACT limitations.

Consistent with the direction you gave me in our conversation, our production operation using the interior booth (PS-14-SIK) will not exceed 80 aircraft per year without prior approval of your Department. Our calculations show that based on 80 aircraft/yr, an emission rate of 3331.98 lbs/yr or 1.67 tons/yr from PS-14-SIK would be expected. RACT limitations of 15 lbs/day and 3 lbs/hr apply to this booth. Converting these limitations to quantities of product yields a maximum usage rate of 2.7 gal/day of a combination of lacquer, thinner, and paint. RACT limitations also restrict the hourly use rate of these same products to a total of approximately .5 gal/hr.

Based on a production rate of 80 aircraft/yr in the exterior booth for fuselage panels, an emission rate of 6,492 lbs/yr would be expected from PS-15-SIK. This emission rate equates to 3.25 tons/yr. This booth will only be used for fuselage panels including cowelings, doors, drive shaft covers, and panels. Although not subject to RACT limitations, it is our understanding that this booth must demonstrate daily compliance with the permit limitations. Consequently a permit limitation of painting the fuselage parts of no more than three (3) aircraft per day will allow this daily demonstration.

Mr. Clair Fancy  
Department of Environmental Regulation  
Page No. 2  
May 5, 1986

Re: Proposed Permit No. AC 50-113559  
AC 50-113784  
AC 50-113785

To provide operating flexibility within the guidelines of the DER rules it is requested that the booths and dust collector be permitted to operate 7 days per week, 24 hours per day.

To avoid any miscommunications we have attached draft permit conditions dealing with the issues we discussed on May 2, 1986. The draft conditions reflect our understanding of the resolution of these issues. It is requested that you review our draft conditions, and should there be any conceptual misunderstanding, please contact us prior to your drafting and finalizing the revised permit conditions.

Thank you for your cooperation and assistance. Your timely attention to these matters is appreciated.

Should you have any questions please contact me at 305/840-5661.

Sincerely,



J. L. Seelinger, Manager  
Utilities Operations/Environmental Affairs

JLS/WJD/fo/4704  
Attachments

cc: G. Fatovic  
R. Henson  
M. Armstrong  
G. Boulay  
R. Nixon

PRODUCT USAGE CALCULATIONSPS-14-SIK

3.3 gallons of varnish or lacquer per aircraft

4.2 gallons of thinner (3.2 gallons used for thinning and 1 gallon for cleaning the equipment) per aircraft

Total usage for 80 aircraft:

3.3 gal/aircraft x 80 aircraft/year = 264 gal/yr of varnish or lacquer

3.2 gal/aircraft x 80 aircraft/year = 256 gal/yr of thinner for thinning

1.0 gal/aircraft x 80 aircraft/year = 80 gal/yr of thinner for cleaning

Additionally, rescue hoists and search lights will be painted in this booth. Yearly usage for these components is:

3 gal/yr of primer

3 gal/yr of finish paint

3 gal/yr of thinner

Calculations:

264 gal/yr x \*7.0 lb/gal x \*1540 lb/ton x 1 ton/2000 lbs = 1422.96 lb/yr

256 gal/yr x \*\*\*6.8 lb/gal = 1740.8 lb/yr

80 gal/yr x \*\*\*6.8 lb/gal x \*\*\*\*0.20 = 108.8 lb/yr

3 gal/yr x \*12.5 lb/gal x \*1120 lb/yr x 1 ton/2000 lbs = 21 lb/yr

3 gal/yr x \*\*9.24 lb/gal x \*\* 0.65 = 18.02 lb/yr

3 gal/yr x \*\*\*6.8 lb/gal = 20.4 lb/yr

Total: (1422.96 + 1740.8 + 108.8 + 21 + 18.02 + 20.4) lb/yr = 3331.98 lb/yr  
= 1.67 tons/yr

\* Based on AP-42 factors

\*\* Maximum weight and maximum VOC content (by weight) of paints currently used at Sikorsky.

\*\*\* The lacquer thinner typically used at Sikorsky weights 6.8 lb/gal (per the Material Safety Data Sheet).

\*\*\*\* It is assumed 80% of the thinner used for cleaning the equipment is recovered.

PS-15-SIK

4 gallons of finish paint per aircraft  
5 gallons of primer per aircraft  
5 gallons of thinner (3 gallons used for cleaning the aircraft and 2 gallons used for cleaning the equipment) per aircraft

Total usage for 80 aircraft:

4 gal/aircraft x 80 aircraft/yr = 320 gallons of finish paint  
5 gal/aircraft x 80 aircraft/yr = 400 gallons of primer  
3 gal/aircraft x 80 aircraft/yr = 240 gallons of thinner used for cleaning the aircraft  
2 gal/aircraft x 80 aircraft/yr = 160 gallons of thinner used for cleaning equipment

Calculations:

320 gal/yr x \*12.5 lb/gal x \*1120 lb/ton x 1 ton/2000 lbs = 2240 lb/yr  
400 gal/yr x \*\*\*\*9.24 lb/gal x \*\*\*\*0.65 = 2402.4 lb/yr  
240 gal/yr x \*\*6.8 lb/gal = 1632 lb/yr  
160 gal/yr x \*\*6.8 lb/gal x \*\*\*0.20 = 217.6 lb/yr

Total: (2240 + 2402.4 + 1632 + 217.6) lb/yr = 6492 lb/yr = 3.25 tons/yr

\* Based on AP-42 factors

\*\* The lacquer thinner typically used at Sikorsky weighs 6.8 lb/gal (per the Material Data Sheet).

\*\*\* It is assumed 80% of the thinner used for cleaning the equipment is recovered.

\*\*\*\* Maximum weight and maximum VOC content (by weight) of paints currently used at Sikorsky.

To calculate daily usage rates for PS-14-SIK:

$$\frac{15 \text{ lbs VOC/day}}{5.39 \text{ lbs VOC/gal of lacquer}} = 2.78 \text{ gal/day of lacquer}$$

$$\text{Average weight of thinner} = \frac{256 (6.8) + 80 (6.8 \times 0.20)}{336} = 5.5 \text{ lbs VOC/gal}$$

$$\frac{15 \text{ lbs VOC/day}}{5.5 \text{ lbs VOC/gal of thinner}} = 2.73 \text{ gal/day of thinner}$$

Can use no more than 2.7 gal/day of any combination of lacquer, thinner and paint.

To calculate hourly usage rates for PS-14-SIK:

$$3 \text{ lb/hr} \times 24 \text{ hrs/day} = 72 \text{ lb/day}$$

$$\frac{72 \text{ lb/day}}{15 \text{ lb/day}} = \frac{x \text{ gal/24 hr day}}{2.7 \text{ gal/24 hr day}}$$

$$X = 12.96 \text{ gal/24 hr day} = 0.54 \text{ gal/hr}$$

Can use no more than 1/2 gal/hr of any combination of lacquer, thinner and paint.

DRAFT PERMIT CONDITIONS DEALING WITH ISSUES DISCUSSED BETWEEN  
J. L. SEELINGER AND CLAIR FANCY ON MAY 2, 1986

- I. Specific conditions for PS-14-SIK (interior booth)
  1. Production shall not exceed 80 aircraft per year without prior approval of the Department.
  2. Daily emissions from the booth shall not exceed 3 lb/hr and 15 lb/day.
  3. The spray booth can operate 24 hrs/day, 7 days/week.
  4. Usage rate of a combination of lacquer, thinner and paint shall not exceed 0.5 gal/hr and 2.7 gal/day.
- II. Specific conditions of PS-15-SIK (exterior booth)
  1. Production shall not exceed 80 aircraft per year without prior approval of the Department.
  2. The booth will be used only to paint fuselage panels (cowelings, doors and drive shaft covers, and panels).
  3. To demonstrate daily compliance with the permit the fuselage panels from no more than 3 helicopters per day will be painted in the booth.
  4. The booth can operate 24 hrs/day, 7 days/week.
- III. Specific conditions for DC-4-SIK
  1. Production shall not exceed 80 aircraft per year without prior approval of the Department.
  2. The collector can operate 24 hrs/day, 7 days/week.
  3. The collector will be used to support the manufacturing operation of no more than 12 helicopters on any given day.



**UNITED  
TECHNOLOGIES  
PRATT & WHITNEY**

P. O. Box 2691  
West Palm Beach, Florida 33402  
305/840-2000

Government Products Division

APR 21 1986

DER

April 17, 1986

Mr. Gary Early  
Office of General Counsel  
Department of Environmental Regulations  
2600 Blair Stone Road  
Tallahassee, Florida 32301-8241

Re: Request for Extension of Time;  
Proposed Permit No. AC50-113559  
AC50-113784  
AC50-113785

Dear Mr. Early:

Pursuant to FAC Rule 17-103.070 we hereby request a thirty (30) day extension of time to file a petition for an administrative proceeding (hearing) regarding the proposed permits identified above.

As the applicant, United Technologies Corporation applied on December 9, 1985 to the Department of Environmental Regulation for a permit to construct two (2) paint spray booths and a work table at our Sikorsky Aircraft facility in West Palm Beach, Florida.

On April 16, 1986 this request for an extension of time was discussed with Mr. Claire Fancy, Deputy Chief, Bureau of Air Quality Management. Mr. Fancy does not object to this request.

Based upon our review of the Technical Evaluation and Preliminary Determination and the proposed permits, there are concerns regarding several specific conditions of the proposed permits that require clarification and resolution. These concerns include but are not limited to the following. Based on FAC Rule 17-2.650(f)14.a(ii)(G) which exempts the painting of metal parts and products of an aircraft's exterior from Reasonable Available Control Technology (RACT), we believe that the volatile organic compound (VOC) emission limitations in the proposed Permit No. AC50-113784 are not applicable. Additionally, some of the specific conditions listed in proposed Permit No. AC50-113559 are overly restrictive by arbitrarily limiting our production output to 36 aircraft per year which corresponds to emission limitations well below the limits of 3 pounds per hour and 15 pounds per day specified in FAC

April 17, 1986

Rule 17-2.650(1)(c)1. Finally, we believe that some of the specific conditions listed in proposed Permit No. AC50-113785 are not applicable to the source (work table) being permitted because this source does not emit VOCs.

As a result of our April 16 conversation with Mr. Fancy, we plan to discuss these concerns with him during the week of April 21, 1986. It is our hope that the issues can be resolved without the need to file a petition for an administrative proceeding.

Accordingly, we respectfully request that this extension be granted.

Sincerely,



R. H. Henson  
Manager, Plant Engineering

cc: Mr. Clair Fancy  
Mr. Armstrong



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION



# Interoffice Memorandum

TO: Willard Hanks  
FROM: Stephanie S. Brooks, WPB  
DATE: April 11, 1986  
SUBJECT: United Technologies/Sikorsky  
AC 50-113559, AC 50-113784, AC 50-113785

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____	Locn: _____
To: _____	Locn: _____
To: _____	Locn: _____
From: _____	Date: _____

DER  
APR 17 1986  
BAQM

The SEFD feels that the paint spray booths should be issued one permit that addresses the construction of both since the production restriction applies to both. The expiration dates are a little tight for them to apply for operation permits.

In addition, AC 50-113784 and AC 50-113559

SC #1 Who is the department? Tally? SEFD? Methodology for approval?

SC #3 Sikorsky is located miles from the road and if the intention is to eliminate objectionable odors offsite, the condition should read that way as was done to Ciba-Geigy.

SC #5 & #6 Once again, who decides to approve increased production?

SC #7 (less than or equal to 3.5 lbs. VOC/gallon coating)

SC #8 If the booth exceeds 3 lbs./hr. or 15 lbs./day, does the source become subject to RACT? A requirement for record keeping and reporting of those days that exceed the limit is necessary.

AC 50-113785

SC #2 & #3 are redundant. As long as they cannot operate the table if the system isn't working, it only stands to reason that leaks will be repaired promptly.

SC #5 Does this tie into the permit production limits in AC 50-113784 and AC 50-113559?

SSB:js:ji

PS Form 3811, July 1982

**SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the back of this card. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the same of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.

2.  Restricted Delivery.

3. Article Addressed to:  
 Mr. R. H. Henson  
 United Technologies Corp.  
 P. O. Box 1621  
 West Palm Beach, FL 33402

4. Type of Service: Article Number  
 Registered  Insured  
 Certified  COD P 408 533 209  
 Express Mail

5. Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee  
 X *Maurice*

6. Signature - Agent  
 X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

WEST PALM BEACH  
 APR 4 1986

DOMESTIC RETURN RECEIPT

P 408 533 209  
 RECEIPT FOR CERTIFIED MAIL  
 NO INSURANCE COVERAGE PROVIDED—  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

Sent to Mr. R. H. Henson	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date <i>3/27/86</i> <i>4/1/86</i>	

PS Form 3800, Feb. 1982

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

March 26, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED


Mr. R. H. Henson  
Manager - Plant Engineering  
United Technologies Corporation  
Post Office Box 1621  
West Palm Beach, Florida 33402

Dear Mr. Henson:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permits to construct a work table and two spray booths at the Sikorsky aircraft assembly facility near West Palm Beach, Florida.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

  
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/pa

Attachments

cc: Isidore Goldman  
Gene Sacco

State of Florida  
Department of Environmental Regulation  
Notice of Intent

The Department gives notice of its intent to issue permits to United Technologies Corporation for the construction of a work table, and two spray booths at their aircraft assembly facility that is 20 miles northwest of West Palm Beach on S.R. 710 in Palm Beach County, Florida. Emissions from the spray booths will be approximately ① TPY VOC. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Dept. of Environmental Regulation  
Southeast Florida District  
3301 Gun Club Road  
West Palm Beach, Florida 33402

Palm Beach County Health Department  
901 Evernia Street  
West Palm Beach, Florida 33402

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

United Technologies Corporation  
P. O. Box 1621  
West Palm Beach, Florida 33402

---

DER File No. AC 50-113559  
AC 50-113784  
AC 50-113785

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the applications specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, United Technologies Corporation, applied on December 9, 1985, to the Department of Environmental Regulation for a permit to construct two new paint spray booths and a work table at the applicant's aircraft assembly facility in Palm Beach County, Florida.

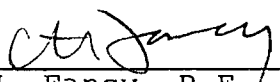
The Department has permitting jurisdiction under Chapter 403, Florida Statutes and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits were needed for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit application. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32301-8241. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

Copies furnished to:

Mr. R. H. Henson, United Technologies Corporation  
Mr. Isidore Goldman, DER Southeast Florida District  
Mr. Gene Sacco, Palm Beach County Health Department

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on April 1, 1986.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Patricia G. Adams April 1, 1986  
Clerk Date



RULES OF THE ADMINISTRATIVE COMMISSION  
MODEL RULES OF PROCEDURE  
CHAPTER 28-5  
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
  - (a) The name and address of each agency affected and each agency's file or identification number, if known;
  - (b) The name and address of the petitioner or petitioners;
  - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
  - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
  - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
  - (f) A demand for the relief to which the petitioner deems himself entitled; and
  - (g) Such other information which the petitioner contends is material.

DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103

of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to an administrative determination (hearing) under Section 120.57, F.S.

(4) Notice to substantially affected persons concerning applications for Department permits is an essential and integral part of the state environmental licensing process. Therefore, no application for a permit for which publication of notice is required shall be granted until and unless proof of publication of Notice is furnished to the appropriate Department permitting office.

(5)(a) Any applicant or person benefiting from the Department's action may elect to publish notice of proposed agency action in the manner provided by subsection (2) or (3). Any person who elects to publish notice of proposed agency action, upon presentation of proof of publication to the Department, prior to final agency action, shall be entitled to the same benefits under this rule as a person who is required to publish notice of proposed agency action. Since persons whose substantial interests are affected by a Department decision on a permit application may petition for an administrative proceeding within fourteen (14) days after receipt of notice and since, unless notice is given or published as prescribed in this rule, receipt of notice can occur at any time, the applicant or persons benefiting from the Department's action cannot justifiably rely on the finality of

the Department's decision without the notice having been duly given or published.

(b) The notices required by this rule may be combined with other notices required by the Department pursuant to Chapter 403, 376, or 253, F.S., or Chapter 17, FAC.

(c) The provisions of this section shall also apply to the permitting of hazardous waste facilities, but only to the extent it is consistent with Chapter 17-30, Part IV, FAC. Whenever Chapter 17-30, Part IV, FAC, provides for a different time or notice procedure than that set forth in this section the time and notice provisions of Chapter 17-30 shall govern.

(6) Failure to publish any notice of application, notice of proposed agency action, or notice of agency action required by the Department shall be an independent basis for the denial of a permit. Specific Authority: 120.53, 403.0876, 403.815, F.S. Law Implemented: 120.53, F.S. History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

**17-103.155 Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.**

(1)(a) Any person whose substantial interests may be affected by proposed or final agency action may file a petition for administrative proceeding. A petition shall be in the form required by this Chapter and Chapter 28-5, FAC, and shall be filed (received) in the Office of General Counsel of the Department within fourteen (14) days of receipt of notice of proposed agency action or within fourteen (14) days of receipt of notice of

DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103

agency action whenever there is no public notice of proposed agency action. In addition to the requirements of Rule 28-5.201, FAC, the Petition must specify the county in which the project is or will be located.

(b) Failure to file a petition within fourteen (14) days of receipt of notice of agency action or fourteen (14) days of receipt of notice of proposed agency action, whichever notice first occurs, shall constitute a waiver of any right to request an administrative proceeding under Chapter 120, F.S.

(c) When there has been no publication of notice of agency action or notice of proposed agency action as prescribed in Rule 17-103.150, FAC, a person who has actual knowledge of the agency action or has knowledge which would lead a reasonable person to conclude that the Department has taken final agency action, has a duty to make further inquiry within fourteen (14) days of obtaining such knowledge by contacting the Department to ascertain whether action has occurred. The Department shall upon receipt of such an inquiry, if agency action has occurred, promptly provide the person with notice as prescribed by Rule 17-103.150, FAC. Failure of the person to make inquiry with the Department within fourteen (14) days after obtaining such knowledge may estop the person from obtaining an administrative proceeding on the agency action.

(2)(a) "Receipt of notice of agency action" means receipt of written notice of final agency action, as prescribed by Department rule, or the publication, pursuant to Department rule, of notice of final agency action, whichever first

occurs.

(b) "Receipt of notice of proposed agency action" means receipt of written notice (such as a letter of intent) that the Department proposes to take certain action, or the publication pursuant to Department rule of notice of proposed agency action, whichever first occurs.

(3) Notwithstanding any other provision in this Chapter, should a substantially affected person who fails to timely request a hearing under Section 120.57, F.S., administratively appeal the final Department action or order, the record on appeal should be limited to:

(a) the application, and accompanying documentation submitted by the applicant prior to the issuance of the agency's intent to issue or deny the requested permit.

(b) the materials and information relied upon by the agency in determining the final agency action or order;

(c) any notices issued or published; and

(d) the final agency action or order entered concerning the permit application.

(4) In such cases where persons do not timely exercise their rights accorded by Section 120.57(1), Florida Statutes, the allegations of fact contained in or incorporated by the final agency action shall be deemed uncontested and true, and appellants may not dispute the truth of such allegations upon subsequent appeal.

(5) Any applicant may challenge the Department's request for additional information by filing with the Office of General Counsel an appropriate petition for administrative proceeding pursuant to Section 120.60, F.S., following receipt by

the applicant of the Department's notification, pursuant to Section 403.0876, F.S., that additional information is required.

Specific Authority: 120.53, 403.0876, 403.815, F.S. Law Implemented: 120.53, F.S. History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

**17-103.160 Uniformity in Approval and Denial of Applications for Department Permits and Certifications.**

To the extent possible and consistent with the public interest, the Department approves and denies applications for permits and certifications on a uniform and consistent basis. Final Department actions on applications for permits and certifications shall be consistent with prior Department actions, unless deviation therefrom is explained by the Department in writing or the hearing officer who submits a recommended order to the Department for final agency action in accordance with Section 120.57, Florida Statutes.

Specific Authority: 120.53(1), F.S. Law Implemented: 120.53(1), 120.68(12), F.S. History: New 2-6-78, Transferred from 17-1.63, 6-1-84.

**17-103.170 Designation, Preparation and Transmittal of Record for Administrative Appeals.**

When any Department action or order is the subject of an administrative appeal under Chapter 17-103, Part II, FAC, the following requirements shall apply:

(1) Designation of Record. Within fifteen (15) days of rendition of the Department's final order, the appellant shall designate

to the Department, in writing, with copies to other parties, those documents or things under the control of or in the possession of the Department which the appellant desires to have included in the record, and which were received or considered in the Department proceeding below. If a proceeding was reported by mechanical recording devices, the appellant shall designate those portions of the proceeding for which it requires written transcription or tapes for transcription. Any other party may designate other portions of the record in the manner provided herein. Such cross-designation shall be filed with the Department, with copies provided other parties, within seven (7) days after receipt of the designation by the appellant.

(2) Original Record. The Department shall thereupon include in the record all of the designated portions of the original papers and exhibits in the proceedings or matter from which administrative appeal is taken, together with a copy of any such parts of the proceedings as were stenographically reported or transcribed from tapes, and as have been designated by the parties and certified by a notary public, the reporter, or other officer for inclusion in the record on appeal or review, and certified copies of the order, if any, of which review is sought. The Department may, at its discretion, substitute certified copies for original papers or documents in its possession.

(3) Preparation of Record. Upon tender or deposit by appellant of the estimated cost of preparation, the Department shall prepare the record in accordance with the designations of the parties. The cost of preparation, and reproduction,

Technical Evaluation  
and  
Preliminary Determination

United Technologies Corporatation  
West Palm Beach, Florida  
Palm Beach County

<u>Source</u>	<u>File Number</u>
Floor Type Spray Booth	AC 50-113559
Auto Spray Booth	AC 50-113784
Work Table	AC 50-113785

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting

March 27, 1986

## I. Application

### A. Applicant

United Technologies Corporation  
Post Office Box 2691  
West Palm Beach, Florida 33402

### B. Request

On December 9, 1985, Mr. J. L. Seelinger, Manager of Environmental Affairs, submitted an application for a permit to construct three air pollution sources at the company's aircraft assembly facility (SIC 3721). The application was considered complete on February 19, 1986, when additional information on the proposed sources was received.

### C. Project and Location

The applicant proposes to install two new paint spray booths and a work table at the aircraft assembly facility that is located 20 miles northwest of West Palm Beach on State Road 710 (Beeline Highway) in Palm Beach County. The UTM coordinates of this facility are zone 17, 567.5 km E and 2975 km N. Interior components will be prepared on the work bench and interior and exterior aircraft parts will be surface coated in the two paint spray booths. The preparation and surface coating operations that will occur in the proposed sources are currently being performed in existing sources at this plant. No increase in the production of aircraft as a result of the new sources is being considered in the review of this application.

### D. Air Pollution Emissions

Aircraft components are shipped to this facility where they are assembled, painted, and tested. The current production rate, which is the basis of the review, is 36 aircraft per year.

The three new sources being reviewed are a work table (file no. AC 50-113785), a floor type spray booth (file no. AC 50-113559), and an auto spray booth (file no. AC 50-113784). Company designations for this equipment are DC-4-SIK, PS-14-SIK, and PS-15-SIK, respectively.

On the work table, wood components for the interior of the aircraft will be finished and prepared for coating. Air (3000-7250 SCFM) containing dust generated by this operation will be filtered through a Aget 80 E 70 dust collector before being discharged to the atmosphere. The dust collector's efficiency and particulate matter emission rate are estimated at 95 percent and 0.03 lb/hr.

Lacquer or varnish will then be applied to the finished wood components in a Binks floor type spray booth equipped with an Andraee paper filter. The ventilation rate for this booth will be 7,400 SCFM. The filter will effectively remove particulate matter but allow the volatile organic compounds (VOC) from the coating operation to escape. The VOC emissions from the booth will be a direct function of the quantity of solvent used in the coating. VOC emissions are estimated to be less than 4.4 lb/day. Basis of this estimate are: the components for each aircraft requires 7-12 days to coat; uses 4 gallons of varnish or lacquer per aircraft; and uses one gallon of thinner per day for clean up of which 80 percent of this thinner is recovered and stored in drums.

Exterior components of the aircraft (approximately 10 percent of each aircraft) will be painted in the Binks auto spray booth that is equipped with Andraee filters. The ventilation rate for the booth will be 12,200 SCFM. Again, particulate matter will be trapped by the filters but the VOC emissions from the paint, thinner, and solvent will escape. These emissions are estimated at 2.7 lb/day.

The following table lists the VOC emissions from the proposed equipment.

Source	lb VOC/day	TPY VOC
Work Bench	0	0
Floor Type Spray Booth	4.44	0.9
Auto Spray Booth	2.71	0.3

VOC emissions from the existing booth will be reduced by a similar amount after the new booths are in operation. The total VOC emissions from the facility will not change as result of the new sources.

## II. Rule Applicability

### A. State Regulations

The proposed projects, installation of a work bench and two spray booths at an existing aircraft assembly plant, are subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code.

The sources will be located in area designated nonattainment for ozone (17-2.410) and attainment for the other criteria pollutants (17-2.420).

The plant is a major facility because VOC emissions exceed 100 TPY. However, the increase in emissions resulting from the proposed projects are less than the significant emission rates listed in Table 500-2, Regulated Air Pollutants-Significant Emission Rates.

The projects are not subject to the prevention of significant deterioration regulations (17-2.500) and new source review for nonattainment areas (17-2.510) because the modification does not result in a significant emission increase of any criteria pollutant (17-2.500(2)(d)4.a(iii) and 17-2.510(2)(d)4.a.).

The projects are not subject to reasonably available control technology (17-2650) because the VOC emissions from each source does not exceed 15 pounds per day or 3 pounds per hour (17-2.650(1)(c)1.).

The project will be reviewed under 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements. The VOC emission standards shall be based on the RACT regulation exemption (17-2.650(1)(c)1). Higher emissions could subject these modifications to review under other regulations.

#### B. Federal Regulations

The proposed projects, minor modifications to a major source, are not subject to review under federal regulations because the modification will not result in a significant net emissions increase of any criteria pollutant.

### III. Technical Evaluation

#### A. Work Tables (DC-4-SIK)

Fugitive dust generated by sanding wood components on the work table will be captured by a 95-99 percent efficient baghouse. Control of the unconfined particulate matter emissions from this source with a baghouse is considered to be reasonable precautions. Maximum particulate matter emissions from this filter will be approximately 0.03 lb/hr.

The department will set an opacity standard of no visible emissions for the source to confirm that the baghouse is being properly operated and maintained.

#### B. Floor Type Spray Booth (PS-14-SIK)

The 7,400 SCFM of ventilation air for this booth will pass through a filter before being exhausted to the atmosphere. The spray particles will be removed by the filter allowing only the VOC emissions to be exhausted to the atmosphere. The company estimates 144 gallons/year of varnish or lacquer will be used to paint interior parts for 36 aircraft. VOC emissions, which includes thinner used for equipment cleaning, are estimated to be



4.44 lb/day for this booth. Air pollution controls are not justified for this low rate of VOC emissions.

#### C. Auto Spray Booth (PS-15-SIK)

The 12,200 SCFM of ventilation air for the booth will pass through a filter before being exhausted to the atmosphere. Paint particles and VOC fumes will be present in the booth. The paint spray particles will be removed by the filter and the VOC fumes will pass through the filter and be exhausted to the atmosphere.

Exterior components for 36 aircraft will be painted with 36 gallons of paint and 18 gallons of thinner in this booth. Also, one gallon of thinner per day, of which 20 percent escapes to the atmosphere, will be used to clean the painting equipment. Total VOC emission from the booth are estimated at 2.71 lb/day.

Air pollution controls are not justified for this low VOC emission rate.

#### IV. Air Quality Analysis

The proposed modifications will not result in a significant net emissions increase of air pollutants as set forth in Rule 17-2.500(2)(e)2., FAC. Therefore, no air quality analysis is required by the regulations. As the net emissions from the facility are basically unchanged by the addition of the three new sources, no change in ambient air quality is expected to result from the new sources.

#### V. Conclusion

Based on the data submitted by United Technologies Corporation, the department has concluded that the construction and operation of the work table and two spray booths will be in compliance with the state regulations. The General and Specific Conditions of this will assure compliance of the new sources with the air pollution control regulations.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

**PERMITTEE:**

United Technologies Corp.  
P. O. Box 2691  
West Palm Beach, FL 33402

Permit Number: AC 50-113784  
Expiration Date: August 15, 1986  
County: Palm Beach County  
Latitude/Longitude: 26° 54' 19" N  
81° 19' 08" W  
Project: Auto Spray Booth  
(PS-15-SLK)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application(s) and approved drawings plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Installation of Binks Auto Spray Booth (Model No. AA-530) with an Andreae paint arrester exhaust filter (Model No. AF-530). Exterior components for aircraft are painted in this booth.

The booth will be located at United Technologies existing aircraft assembly facility which is 20 miles northwest of West Palm Beach on State Road 710 (Beeline Highway) in Palm Beach County.

The UTM coordinates of this facility are Zone 17, 567.5 km E and 2975 km N.

The construction shall be in accordance with attached permit application, plans, documents, and drawings except as noted in the Specific Conditions of this permit.

**Attachments are as follows:**

1. Application to Construct Air Pollution Source, DER form 17-2.202(1), dated December 5, 1985.
2. DER letter dated January 6, 1986.
3. United Technologies letter dated February 6, 1986.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: August 15, 1986

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: August 15, 1986

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: August 15, 1986

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD).
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

**PERMITTEE:**  
United Technologies Corp.

**Permit Number:** AC 50-113784  
**Expiration Date:** August 15, 1986

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. The spray booth shall not be used more than 16 hrs/day, 6 days/week, and 52 weeks/year without prior approval of the department.
2. The booth shall not be used unless the ventilation system and filter are operating properly.
3. The company shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
4. Visible emissions shall not exceed 5 percent opacity (6 minute average) as determined by Method 9 which is described in 40 CFR 60, Appendix A, from any part of the booth.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113784  
Expiration Date: August 15, 1986

**SPECIFIC CONDITIONS:**

5. Production shall not exceed 36 aircraft per year without prior approval of the department.
6. Not more than 36 gals/year of paint and 270 gallons per year of thinner (including thinner used to clean equipment) shall be used in this booth without prior approval of the department.
7. The company shall actively seek low solvent coatings (less 3.5 lbs VOC/gallon coating) as replacement for the paint now used in this operation.
8. Calculated daily VOC emissions from this booth, based on purchases, inventory, and waste solvents collected, shall not exceed 3 lb/hr and 15 lb/day.
9. The permittee shall demonstrate compliance with the conditions of this construction permit and submit a complete application for permit to operate to the Southeast Florida District office at least 90 days prior to the August 15, 1986, expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this construction permit until its expiration date.
10. Any permit to operate issued for the booth shall limit its use to 4,992 hrs/year, and require an annual operation report which includes, as a minimum, the number of aircraft manufactured during the year, the calculated daily VOC emissions, and the results of the study to locate a substitute low solvent coating for this operation.

Issued this \_\_\_\_ day of \_\_\_\_,  
19\_\_.

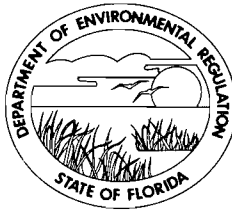
STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
VICTORIA J. TSCHINKEL, Secretary

\_\_\_\_ pages attached.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

**PERMITTEE:**  
United Technologies Corp.  
P. O. Box 2691  
West Palm Beach, FL 33402

Permit Number: AC 50-113559  
Expiration Date: August 15, 1986  
County: Palm Beach County  
Latitude/Longitude: 26° 54' 19" N  
81° 19' 08" W  
Project: Floor Type Spray Booth  
(PS-14-SLK)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application(s) and approved drawings plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Installation of a Binks floor type spray booth (Model No. PFA-8-7-T-LH) equipped with an Andraee filter. Interior wood components for aircraft are coated with varnish or lacquer in this booth.

The booth will be located at United Technologies existing aircraft assembly facility which is 20 miles northwest of West Palm Beach on State Road 710 (Beeline Highway) in Palm Beach County.

The UTM coordinates of this facility are Zone 17, 567.5 km E and 2975 km N.

The construction shall be in accordance with attached permit application, plans, documents, and drawings except as noted in the Specific Conditions of this permit.

**Attachments are as follows:**

1. Application to Construct Air Pollution Source, DER form 17-2.202(1), dated December 5, 1985.
2. DER letter dated January 6, 1986.
3. United Technologies letter dated February 6, 1986.



PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: August 15, 1986

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: August 15, 1986

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: August 15, 1986

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD).
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

**PERMITTEE:**  
United Technologies Corp.

**Permit Number:** AC 50-113559  
**Expiration Date:** August 15, 1986

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. The spray booth shall not be used more than 16 hrs/day, 6 days/week, and 52 weeks/year without prior approval of the department.
2. The booth shall not be used unless the ventilation system and filter are operating properly.
3. The company shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
4. Visible emissions shall not exceed 5 percent opacity (6 minute average) as determined by Method 9 which is described in 40 CFR 60, Appendix A, from any part of the booth.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113559  
Expiration Date: August 15, 1986

**SPECIFIC CONDITIONS:**

5. Production shall not exceed 36 aircraft per year without prior approval of the department.
6. Not more than 144 gals/year of varnish or lacquer, and 252 gals/year of thinner (including thinner used to clean equipment) shall be used in this booth without prior approval of the department.
7. The company shall actively seek low solvent coatings (less 3.5 lb VOC/gallon coating) as a replacement for the varnish and lacquer now used in this operation.
8. Quarterly calculated daily VOC emissions from this booth, based on purchases, inventory, and waste solvents collected, shall not exceed 3 lb/hr and 15 lb/day.
9. The permittee shall demonstrate compliance with the conditions of this construction permit and submit a complete application for permit to operate to the Southeast Florida District office at least 90 days prior to the August 15, 1986, expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this construction permit until its expiration date.
10. Any permit to operate issued for the booth shall limit its use to 4,992 hrs/year, and require an annual operation report which includes, as a minimum, the number of aircraft manufactured during the year, the calculated daily VOC emissions, and the results of the study to locate a substitute low solvent coating for this operation.

Issued this \_\_\_\_\_ day of \_\_\_\_\_,  
19\_\_\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
VICTORIA J. TSCHINKEL, Secretary

\_\_\_\_\_ pages attached.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

**PERMITTEE:**  
United Technologies Corp.  
P. O. Box 2691  
West Palm Beach, FL 33402

Permit Number: AC 50-113785  
Expiration Date: August 15, 1986  
County: Palm Beach County  
Latitude/Longitude: 26° 54' 19" N  
81° 19' 08" W  
Project: Work Table (DC-4-SLK)

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application(s) and approved drawings plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Construction a 12 x 2.5 foot downdraft work table equipped with a dust collection system consisting of ducts, an Aget 80 E 70 exhauster, and a FH 58-2D baghouse. Interior wood components for aircraft are prepared by woodworking, sanding and rubbing down on the work table. The work table will be located at United Technologies existing aircraft assembly facility which is 20 miles northwest of West Palm Beach on State Road 710 (Beeline Highway) in Palm Beach County. The UTM coordinates of this facility are zone 17, 567.5 km E and 2975 km N.

The construction shall be in accordance with attached permit application, plans, documents, and drawings except as noted in the Specific Conditions of this permit.

**Attachments are as follows:**

1. Application to Construct Air Pollution Source, DER form 17-2.202(1), dated December 5, 1985.
2. DER letter dated January 6, 1986.
3. United Technologies letter dated February 6, 1986.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: August 15, 1986

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: August 15, 1986

**GENERAL CONDITIONS:**

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.



PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: August 15, 1986

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD).
- ( ) Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

**PERMITTEE:**  
United Technologies Corp.

**Permit Number:** AC 50-113785  
**Expiration Date:** August 15, 1986

**GENERAL CONDITIONS:**

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
  - the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

**SPECIFIC CONDITIONS:**

1. The work table shall not be used more than 16 hrs/day, 6 days/week, and 52 weeks/year without prior approval of the department.
2. The work table shall not be used to finish wood components unless the dust collection system is operating properly.
3. Any leaks in the system that allows dust to be discharged without filtration shall be repaired promptly.

PERMITTEE:  
United Technologies Corp.

Permit Number: AC 50-113785  
Expiration Date: August 15, 1986

**SPECIFIC CONDITIONS:**

4. Visible emissions shall not exceed 5 percent opacity (6 minute average), as determined by Method 9 which is described in 40 CFR 60, Appendix A, from any part of the work table and dust collection system.
5. Production shall not exceed 36 aircraft per year without prior approval of the department.
6. The permittee shall demonstrate compliance with the conditions of this construction permit and submit a complete application for permit to operate to the Southeast Florida District office at least 90 days prior to the August 15, 1986, expiration date of this construction permit. The permittee may continue to operate in compliance with all terms of this construction permit until its expiration date.
7. Any permit to operate issued for the work table shall limit its use to 4,992 hours per year and require an annual operation report which includes, as a minimum, the number of aircraft for which interior components were manufactured on the table.

Issued this \_\_\_\_\_ day of \_\_\_\_\_,  
19\_\_\_\_.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

---

VICTORIA J. TSCHINKEL, Secretary

\_\_\_\_\_ pages attached.



**UNITED  
TECHNOLOGIES  
PRATT & WHITNEY  
AIRCRAFT**

P. O. Box 2691  
West Palm Beach, Florida 33402  
305/840-2000

**Government Products Division**

February 6, 1986

Mr. C. H. Fancy, Deputy Chief  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32302

Re: Construction Permit - Sikorsky Facility - File No. AC 50-113559

Dear Mr. Fancy:

In accordance with your January 6, 1986 request for additional information, submitted are our attached responses.

Please direct any questions regarding these responses to Lisa Hill 305/840-5655 of our office.

Sincerely,

  
R. H. Henson, Manager  
Plant Engineering

RHH/LKH/fo/4395

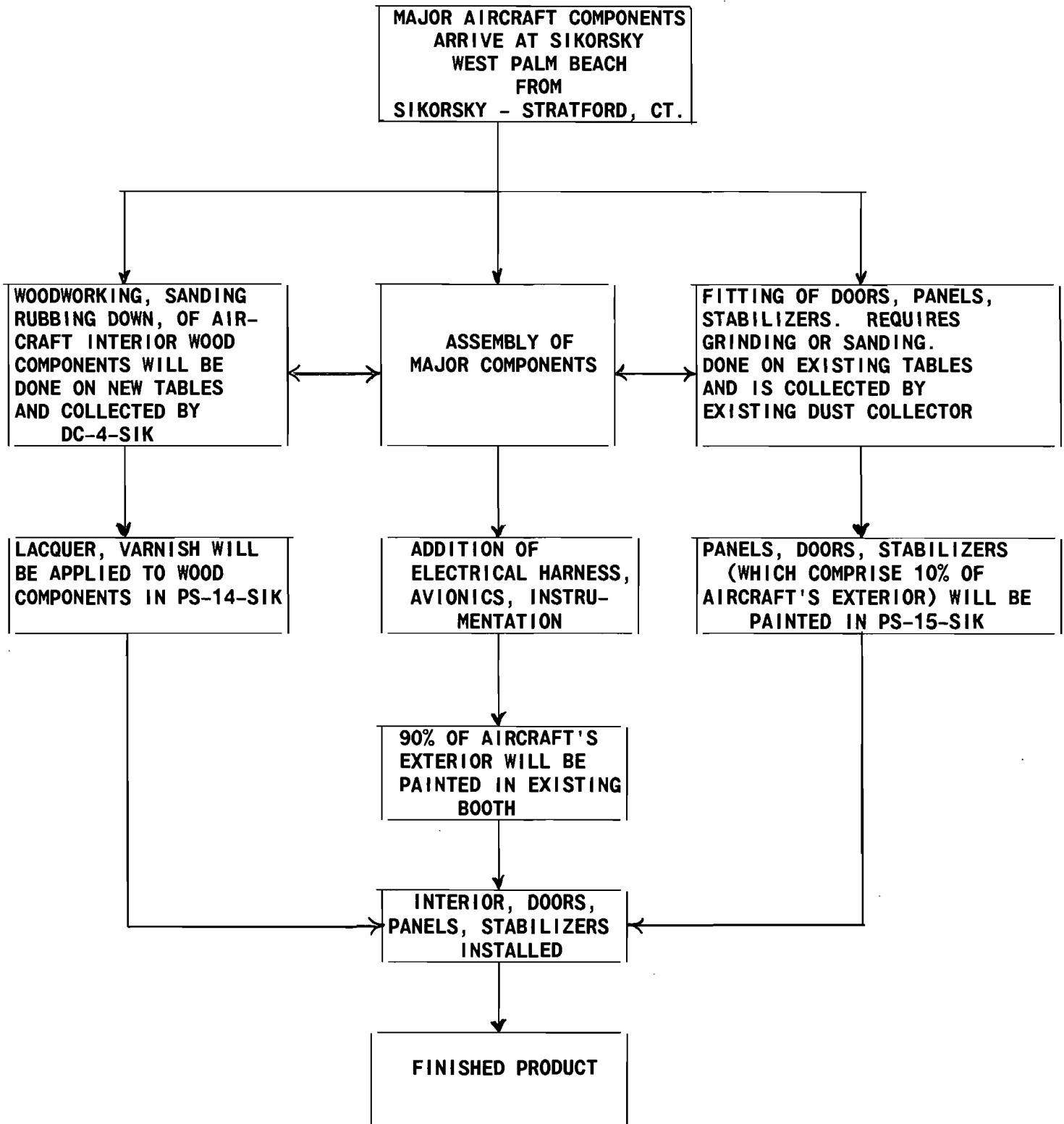
cc: R. Duke - DER  
E. Sacco - PBCHD

DER

FEB 10 1986

BAQM

1. Block Diagram:



2. The aircraft's interior wood components (type specified by the customer), will be sanded on the new work table and the particles will be collected by DC-4-SIK. Typically, the largest interior component is approximately 12"x14"x48". In PS-14-SIK, lacquer and varnish will be applied to the above mentioned interior wood components. Exterior aircraft panels, stabilizers and doors will be painted in PS-15-SIK. These components are a composite material and typically the largest component that will be painted in this booth will be a stabilizer, which is approximately 7'x4'.
  3. Lacquer thinner is used to clean the painting equipment (spray guns, etc...). Approximately 20% is emitted into the atmosphere and the remaining 80% is recovered into drums which are then managed relative to on site storage and off site disposal as hazardous wastes. Assuming 20% is emitted into the atmosphere, for every gallon of thinner used to clean the equipment, approximately 1.36 lb of VOC's are emitted into the atmosphere (6.8 lb/gal x 1 gal x 0.20).\* Prior to painting each aircraft, the existing booth is swept out. The trash and debris, such as dust, tape, and paper from the sweeping operations, is collected and disposed of in trash receptacles. Approximately every four years professional contractors clean the booth and the waste from this cleaning operation is collected into drums and disposed of as a hazardous waste.
  4. The proposed equipment is not for new operations at the plant. The new equipment will be an addition to the existing equipment and will be used to paint components that are currently being painted in the existing booth. There is currently no planned production increase at the plant as a result of the proposed equipment.
  5. Before Currently, the entire aircraft's exterior is painted in an existing booth. The aircraft's stabilizers, doors and panels (which comprise approximately 10% of an aircraft's exterior) are painted in one half of the booth and the remaining 90% of the aircraft's exterior is painted in the other half of the booth. It takes an average of 10 days and a minimum of 7 days in each half of the booth to paint the exterior components. Seven days was used for the following calculations to show a maximum VOC emission rate per day.
    - Assume 10 gal. of paint and 5 gal. of thinner is used to paint the entire aircraft (including stabilizers, doors, panels etc...)
    - Assume paint weighs 9.24 lb/gal and is 65% volatile.\*\*
    - Assume lacquer thinner weighs 6.8 lb/gal and is 100% volatile.\*
    - Assume 2 gal/day of lacquer thinner is used to clean the equipment and assume 20% is emitted into the atmosphere and 80% is recovered into drums.
    - Assume it takes 7 days to paint the aircraft's exterior.
- \* The lacquer thinner typically used at Sikorsky weighs 6.8 lb/gal (per the material safety data sheet).
- \*\* Maximum weight and maximum VOC content (by weight) of DuPont paints used at Sikorsky.

4328

10 gal/aircraft x 9.24 lb/gal x 0.65 x 1 aircraft/7 days = 8.58 lb/day  
5 gal thinner/aircraft x 6.8 lb/gal x 1 aircraft/7 days = 4.86 lb/day  
2 gal thinner/day x 6.8 lb/gal x 0.20 (amount emitted to atmosphere) =  
2.72 lb/day

Total: 8.58 lb/day + 4.86 lb/day + 2.72 lb/day = 16.16 lb/day  
Based on an average of 10 days to paint an aircraft, the above  
total comes out to 12.13 lb/day.

#### After

When PS-15-SIK is installed, the doors, stabilizers and panels will be painted in this booth and the remaining 90% of the aircraft's exterior will continue to be painted in the existing booth. Again, for the following calculations, it was assumed that it takes a minimum of 7 days to paint the exterior components in the existing booth and 7 days to paint the exterior components in PS-15-SIK.

#### Existing booth

- Assume 9 gallons of paint and 4.5 gallons of lacquer thinner is used to paint 90% of the aircraft.
- Assume paint weighs 9.24 lb/gal and is 65% volatile.\*
- Assume lacquer thinner weighs 6.8 lb/gal and is 100% volatile.\*\*
- Assume 1 gal/day of lacquer thinner is used to clean the equipment and assume 20% is emitted into the atmosphere and 80% is recovered into drums.
- Assume it takes 7 days to paint 90% of the aircraft.

9 gal/aircraft x 9.24 lb/gal x 0.65 x 1 aircraft/7 days = 7.72 lb/day  
4.5 gal thinner/aircraft x 6.8 lb/gal x 1 aircraft/7 days = 4.37 lb/day  
1 gal/day x 6.8 lb/gal x 0.20 = 1.36 lb/day

Total: 7.72 lb/day + 4.37 lb/day + 1.36 lb/day = 13.45 lb/day

#### PS-15-SIK

- Assume 1 gallon of paint and 0.5 gallon of thinner is used to paint the remaining 10% of the aircraft (doors, stabilizers, panels).
- Assume paint weighs 9.24 lb/gal and is 65% volatile.\*
- Assume lacquer thinner weighs 6.8 lb/gal and is 100% volatile.\*\*
- Assume 1 gal/day of lacquer thinner is used to clean the equipment and assume 20% is emitted into the atmosphere and 80% is recovered into drums.
- Assume it takes 7 days to paint 10% of the aircraft.

1 gal/aircraft x 9.24 lb/gal x 0.65 x 1 aircraft/7days = 0.86 lb/day  
0.5 gal thinner/aircraft x 6.8 lb/gal x 1 aircraft/7 days = 0.49 lb/day  
1 gal/day x 6.8 lb/gal x 0.20 = 1.36 lb/day

Total: 0.86 lb/day + 0.49 lb/day + 1.36 lb/day = 2.71 lb/day

\* Maximum weight and maximum VOC content (by weight) of Dupont paints used at Sikorsky.

\*\*The lacquer thinner typically used at Sikorsky weighs 6.8 lb/gal (per the attached material safety data sheet).

PS-14-SIK (before and after)

The VOC emissions which currently result from the interior painting operations will be the same after PS-14-SIK is installed. When PS-14-SIK is installed, the painting operations will move into this booth and therefore the only thing that will change will be the VOC discharge location. The following calculations show the VOC emissions before and after PS-14-SIK is installed.

- Assume it takes 4 gallons of varnish or lacquer to paint the interior wood components.
- Per AP-42 (dated 1977) section 4.2, assume varnish or lacquer weighs 7.0 lb/gal and emissions = 1540 lb/ton (Table 4.2-1 of AP-42)
- Assume it takes 7 days to paint the interior wood components.
- Assume lacquer thinner weighs 6.8 lb/gal and is 100% volatile.\*
- Assume 1 gal/day of lacquer thinner is used to clean the equipment and assume 20% is emitted into the atmosphere and 80% is recovered into drums.

4 gal/aircraft x 1 aircraft/ 7days x 7.0 lb/gal x 1540 lb/ton x 1 ton/2000lbs  
= 3.08 lb/day

1 gal thinner/day x 6.8 lb/gal x 0.20 = 1.36 lb/day

Total: 3.08 lb/day +1.36 lb/day = 4.44 lb/day

6. Sikorsky Aircraft in West Palm Beach is a development flight center for flight testing of new aircraft. These aircraft are manufactured at Sikorsky Aircraft in Stratford, Conn. and then shipped to the Sikorsky facility in West Palm Beach, FL where they are assembled, painted and tested (see response to question #1).

Each aircraft's exterior is custom painted and the paint normally used is a urethane enamel manufactured by DuPont. It takes approximately 7-12 days and 10 gallons of paint + 5 gallons of lacquer thinner to paint the exterior of each aircraft. To paint the aircraft's interior wood components, requires approximately 7-12 days and 4 gallons of lacquer or varnish.

The Sikorsky paint spray activities typically operate 8 hours/day, 5 days/week and 52 weeks/year. However, the activities could operate a maximum of 16 hours/day, 5 days/week and 52 weeks/year, the time shown in item A, Attachment A of our Construction permit application submittal of December 6, 1985. (The time listed for the dust collector in item A, Attachment A, also reflects a maximum operating time. Typically, the operating time would also be 8 hours/day, 5 days/week and 52 weeks/year).

The aircraft's interior wood components will be painted in PS-14-SIK. The stabilizers, flaps, and doors (which comprise approximately 10% of an aircraft's exterior) will be painted in PS-15-SIK. It will require approximately 1 gallon of lacquer thinner per day, per booth, to clean the painting equipment.

- \* The lacquer thinner typically used at Sikorsky weighs 6.8 lb/gal (per the material safety date sheet).



The VOC emissions for PS-14-SIK and PS-15-SIK (the two new booths) were calculated for question #5 (refer to question #5). These calculations were made to reflect a maximum VOC emission rate per day assuming the following conditions:

1. The minimum amount of time in which an aircraft can be painted is 7 days.
2. The maximum weight and VOC content of the DuPont paints used at Sikorsky is 9.24 lb/gal and 65% respectively. (See footnote page 1 & 2).

The calculations in question #5 show that the emissions resulting from each booth (PS-14-SIK and PS-15-SIK) do not exceed 15 pounds per day. Additionally, per Chapter 17-2.650(1)(f)14.a(ii)(G), it is our understanding that painting the exterior of airplanes is exempt from Reasonable Available Control Technology (RACT). It is our further understanding, based on our meeting with Mr. Steve Fox of the DER on January 21, 1986 and his subsequent phone call to us of January 23, 1986, that the exterior aircraft painting at our facility qualifies for this exemption.

PS Form 3811, July 1983

DOMESTIC RETURN RECEIPT

**SENDER: Complete items 1, 2, 3 and 4.**  
 Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1.  Show to whom, date and address of delivery.  
 2.  Restricted Delivery.

3. Article Addressed to:  
 Mr. R. H. Henson  
 United Technologies Corp.  
 P. O. Box 1621  
 West Palm Beach, FL 33402

4. Type of Service: Article Number  
 Registered  Insured  
 Certified  COD P 408 533 649  
 Express Mail

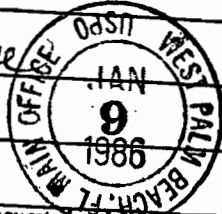
Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee  
 X *[Signature]*

6. Signature - Agent  
 X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and for paid)



P 408 533 649  
 RECEIPT FOR CERTIFIED MAIL  
 NO INSURANCE COVERAGE PROVIDED—  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

Sent to	
Mr. R. H. Henson	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
<b>TOTAL Postage and Fees</b>	<b>\$</b>
Postmark or Date	
1/7/86	

PS Form 3800, Feb. 1982

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

January 6, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. R. H. Henson  
Manager - Plant Engineering  
United Technologies Corporation  
Post Office Box 1621  
West Palm Beach, Florida 33402

Dear Mr. Henson:

RE: File No. AC 50-113559

The department has made a preliminary review of your December 5 application for a permit to construct two paint spray booths and a work table with a dust collector system at the Sikorsky aircraft facility in West Palm Beach, Florida. We need more information to process this application. Please complete the application by supplying the information requested below.

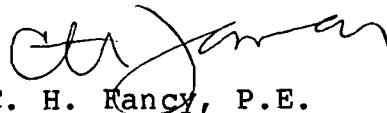
1. Please provide a general flow sheet (block diagrams) of the aircraft manufacture and overhaul operations which shows how the two paint spray booths and the work table with a dust collector are used in these operations.
2. Describe the general operations and material being handled in the spray booths and on the work bench. Include the composition and size of the material being processed (i.e., - 2'x4' plastic interior panels).
3. How are the spray guns and booths cleaned? If organic solvents are used, estimate the VOC emissions from the clean-up operation.
4. Is the proposed equipment for new operations at this plant or a replacement to existing operations? Will production at the plant increase as a result of the proposed equipment?
5. Please tabulate the total VOC emissions (paint, thinner, clean up solvents, etc.) from the spray booths and any other affected operation at this plant before and after the booths are available for service.

Mr. R. H. Henson  
Page Two  
January 6, 1986

6. Describe the operations that release VOC from the new and any affected operation in enough detail to provide reasonable assurance that the emissions from paints, thinners, and clean-up operations will not exceed 15 pounds per day and 3 pounds per hour. Include the maximum rate (gallons per hour) of applying the paint, VOC content of the paint - including any thinner, amount of solvent used, losses, and the time of the clean-up operations. If the description fails to provide assurance that the exemption limits are not exceeded, the spray booth operation may be subject to the RACT regulations.

As soon as the information requested above is received, we will resume processing your application. If you have any questions regarding the information being requested, please call Willard Hanks at (904) 488-1344 or write me at the department's Tallahassee address.

Sincerely,



C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CF/WH/p

cc: Mr. J. L. Seelinger  
Mr. Isidore Goldman ✓  
Mr. Gene Sacco



**UNITED  
TECHNOLOGIES  
PRATT & WHITNEY  
AIRCRAFT**

P. O. Box 2691  
West Palm Beach, Florida 33402  
305/840-2000

December 6, 1985

**Government Products Division**

Mr. C. H. Fancy  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32302-8241

DER

DEC 09 1985

BAQM

Re: Air Pollution Construction Permit (Sikorsky Dust Collector and Two Paint Spray Booths)

Dear Mr. Fancy:

Enclosed are four (4) copies of DER Form 17-1.202(1) "Application to Operate/Construct Air Pollution Sources" for the above referenced air permit, along with the required check No. 607941 for \$300 made payable to the Department of Environmental Regulation, State of Florida.

The new paint spray booths and dust collector will be located at the Sikorsky Aircraft facility on site which is approximately one (1) mile west of the Pratt & Whitney Manufacturing/Office Area. All three sources will be used in the manufacture and overhaul of helicopters at Sikorsky Aircraft.

Your efforts to have this permit issued will be greatly appreciated. Should you desire any further information, please let us know.

Sincerely,

J. L. Seelinger, Manager  
Utilities Operations/Environmental Affairs

JLS/WJD/fo/4187  
Attachments

cc: R. Duke - DER-WPB  
E. Sacco - PBCHD

**SIKORSKY AIRCRAFT**



Stratford, Connecticut 06602

607941

53-137  
118

CHECK NO.

OPERATING ACCOUNT  
OLD COLONY BANK  
OF HAMPDEN COUNTY, N. A.  
HOLYOKE, MASS.

IN FULL SETTLEMENT OF  
ITEMS LISTED IN ACCOMPANYING  
REMITTANCE ADVICE

TO THE ORDER OF

VOUCHER NO.

CHECK NO.

DATE

PAY

DEPARTMENT OF ENVIRONMENTAL REGULATION  
STATE OF FLORIDA

607941

12/4/85

\$\*\*\*300.00\*\*\*

*SV Park*  
AUTHORIZED SIGNATURE  
*BO [unclear]*  
AUTHORIZED COUNTERSIGNATURE

SA 1034-5

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

Nº 78101

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Sikorsky Aircraft Date Dec. 12, 1985

Address Stratford Connecticut 06602 Dollars \$ 300.00

Applicant Name & Address Same as above

Source of Revenue \_\_\_\_\_

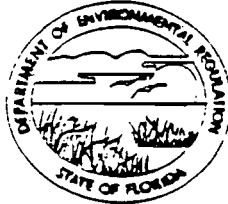
Revenue Code 001031 Application Number AC 50-113559

By Patricia G. Adams

AC 50-113559

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES  
Two (2) Paint Spray Booths

SOURCE TYPE: One (1) Dust Collector System  New  Existing

APPLICATION TYPE:  Construction  Operation  Modification  
United Technologies Corp.

COMPANY NAME: Sikorsky Aircraft COUNTY: Palm Beach

Identify the specific emission point source(s) addressed in this application (i.e. Line

Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) PS-14-SIK  
PS-15-SIK DC-4-SIK

SOURCE LOCATION: Street S.R. 710 - Beeline Highway City 20 miles N.W. of West Palm Beach

UTM: East 17,567.5 KM North 2975 KM

Latitude 26° 54' 19" N Longitude 81° 19' 08" W

APPLICANT NAME AND TITLE: United Technologies Corporation - Sikorsky Aircraft

APPLICANT ADDRESS: P. O. Box 1621 West Palm Beach, FL 33402

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of United Technologies Corporation  
Sikorsky Aircraft

I certify that the statements made in this application for a Construction Air Pollution permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: R H Henson

R. H. Henson, Manager - Plant Engineering  
Name and Title (Please Type)

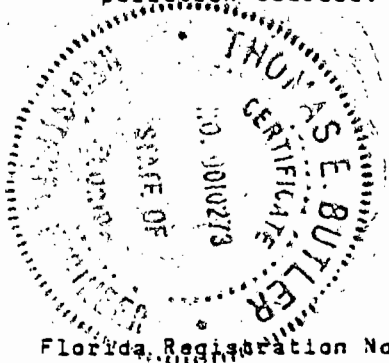
Date: 12/5/85 Telephone No. 305/840-5461

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed Thomas Butler

Thomas E. Butler

Name (Please Type)  
United Technologies Corporation  
Pratt & Whitney

Company Name (Please Type)

Post Office Box 2691, West Palm Beach, Florida

Mailing Address (Please Type)

Florida Registration No. 10273 Date: 12/6/85 Telephone No. 305/840-2940

**SECTION II: GENERAL PROJECT INFORMATION**

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See Attachment A

B. Schedule of project covered in this application (Construction Permit Application Only)  
 Start of Construction PS-14-SIK upon issuance of permit PS-15-SIK upon issuance of permit DC-4-SIK upon issuance of permit Completion of Construction PS-14-SIK 30 days after issuance of permit PS-15-SIK DC-4-SIK

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

PS-14-SIK - Approximately \$8,750.00

PS-15-SIK - Approximately \$12,550.00

DC-4-SIK - Approximately \$15,450.00

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Renewal Application for A0-50-30558 which covers air pollution sources in the Manufacturing area, Sikorsky and Optics and Applied Technology Lab was submitted to

DER - WPB October 1, 1985. Permit issuance by DER is pending. Permit A0-50-30558 was issued on 12/9/80 and expires on 12/9/85.  
 DER Form 17-1.202(1) Effective October 31, 1982 Page 2 of 12



E. Requested permitted equipment operating time: hrs/day 16; days/wk 6; wks/yr 52; if power plant, hrs/yr \_\_\_\_\_; if seasonal, describe: \_\_\_\_\_

F. If this is a new source or major modification, answer the following questions. (Yes or No)

- 1. Is this source in a non-attainment area for a particular pollutant? Yes
  - a. If yes, has "offset" been applied? NO
  - b. If yes, has "Lowest Achievable Emission Rate" been applied? NO
  - c. If yes, list non-attainment pollutants. Ozone

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. NO

3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NO

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NO

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NO

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? See Attachment B

a. If yes, for what pollutants? \_\_\_\_\_

b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

See Attachment B

**SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)**

A. Raw Materials and Chemicals Used in your Process, if applicable: N/A

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr):           N/A
2. Product Weight (lbs/hr):           N/A

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary) See Attachment C

Name of Contaminant	Emission <sup>1</sup>		Allowed Emission Rate per Rule 17-2	Allowable <sup>3</sup> Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	

<sup>1</sup>See Section V, Item 2.

<sup>2</sup>Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard.

<sup>4</sup>Emission, if source operated without control (See Section V, Item 3).

J. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
PS-14-SIK, PS-15-SIK				
Andrea Exhaust Air Filter for Airborne Particulate #29-359	Particulate Matter	94-96%		Manufacturer Guarantee
DC-4-SIK				
AGET after filter Model #FH-58-D2	Wood Particles	95-99%		Manufacturer Guarantee

E. Fuels Not Applicable

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

\*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: \_\_\_\_\_ Percent Ash: \_\_\_\_\_

Density: \_\_\_\_\_ lbs/gal Typical Percent Nitrogen: \_\_\_\_\_

Heat Capacity: \_\_\_\_\_ BTU/lb \_\_\_\_\_ STU/gal

Other Fuel Contaminants (which may cause air pollution): \_\_\_\_\_

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average \_\_\_\_\_ Maximum \_\_\_\_\_

G. Indicate liquid or solid wastes generated and method of disposal. Not applicable

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H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack): Not Applicable

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ ft.

Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM Gas Exit Temperature: \_\_\_\_\_ °F.

Water Vapor Content: \_\_\_\_\_ % Velocity: \_\_\_\_\_ FPS

**SECTION IV: INCINERATOR INFORMATION**

Not Applicable

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste \_\_\_\_\_

Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_

Approximate Number of Hours of Operation per day \_\_\_\_\_ day/wk \_\_\_\_\_ wks/yr. \_\_\_\_\_

Manufacturer \_\_\_\_\_

Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

	Volume (ft) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ Stack Temp. \_\_\_\_\_

Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM\* Velocity: \_\_\_\_\_ FPS

\*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device:  Cyclone  Wet Scrubber  Afterburner  
 Other (specify) \_\_\_\_\_

Brief description of operating characteristics of control devices: \_\_\_\_\_

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

#### SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]  
(Not Applicable)
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made. (See attachment C & attached drawings D1, D2 and D3). DER method 9 is a proposed method to show proof of compliance for DC-4-SIK.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).  
(See AP-42 (August 1977) Table 4.2.-f)
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.) (See attachments D1, D2 and D3)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency). (See Section III-D)
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained. (See attachments E1, E2, and E3)
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).  
(See Attachment F)
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.  
(See Attachment G)

- 9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
- 10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

**SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY**  
(Not Applicable)

- A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?  
 Yes  No

Contaminant	Rate or Concentration
_____	_____
_____	_____
_____	_____
_____	_____

- B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)  
 Yes  No

Contaminant	Rate or Concentration
_____	_____
_____	_____
_____	_____
_____	_____

- C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration
_____	_____
_____	_____
_____	_____
_____	_____

- D. Describe the existing control and treatment technology (if any).

- |                           |                          |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:*           | 4. Capital Costs:        |

\*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height:

ft.

b. Diameter:

ft.

c. Flow Rate:

ACFM

d. Temperature:

°F.

e. Velocity:

FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control devices, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:<sup>1</sup>
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:<sup>2</sup>
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:<sup>1</sup>
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:<sup>2</sup>
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:<sup>1</sup>
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:<sup>2</sup>
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:

- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

<sup>1</sup> Explain method of determining efficiency.  
 Energy to be reported in units of electrical power - KWH design rate.



(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant	Rate or Concentration

(8) Process Rate:<sup>1</sup>

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant	Rate or Concentration

(8) Process Rate:<sup>1</sup>

10. Reason for selection and description of systems:

<sup>1</sup>Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

**SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

(Not Applicable)

**A. Company Monitored Data**

1. \_\_\_\_\_ no. sites \_\_\_\_\_ TSP \_\_\_\_\_ ( ) SO<sub>2</sub>\* \_\_\_\_\_ Wind spd/dir

Period of Monitoring \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year

Other data recorded \_\_\_\_\_

Attach all data or statistical summaries to this application.

Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent?  Yes  No
- b. Was instrumentation calibrated in accordance with Department procedures?  
 Yes  No  Unknown

B. Meteorological Data Used for Air Quality Modeling

1. \_\_\_\_\_ Year(s) of data from \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year
2. Surface data obtained from (location) \_\_\_\_\_
3. Upper air (mixing height) data obtained from (location) \_\_\_\_\_
4. Stability wind rose (STAR) data obtained from (location) \_\_\_\_\_

C. Computer Models Used

1. \_\_\_\_\_ Modified? If yes, attach description.
2. \_\_\_\_\_ Modified? If yes, attach description.
3. \_\_\_\_\_ Modified? If yes, attach description.
4. \_\_\_\_\_ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO <sub>2</sub>	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT A

- A. This construction permit application is for two paint spray booths and one dust collector which will be constructed at Sikorsky Aircraft for manufacturing and overhauling of helicopters.

The #PS-14-SIK paint spray booth will be a Binks Model PFA-8-T-LH floor type spray booth equipped with a 24" diameter 1-1/2 h.p. exhaust fan. It will be used to spray the interior of helicopters. A make up air unit with a 24" diameter 2 hp air supply fan will supply air to the booth. The air leaving the booth will be filtered through Andrea's exhaust air filters and then exhausted through a 24" diameter duct.

The #PS-15-SIK paint spray booth, Binks Model AA530 equipped with a 34" diameter 3 hp exhaust fan, will be used to spray approximately 10%\* of each helicopter's exterior. Supply air for the booth will enter through filtered doors located at the east side of the booth. The air leaving the booth will be filtered through Andrea's exhaust air filters and then exhausted through a 34" diameter duct.

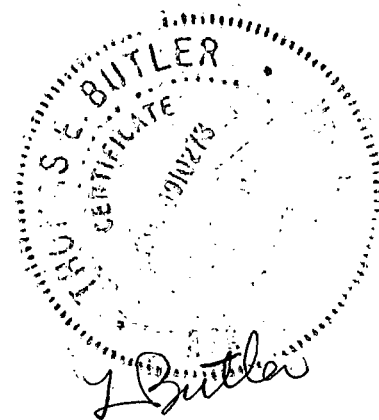
Each booth will operate approximately 16 hours a day, 5 days a week and 52 weeks a year. Approximately 3 helicopters per month or 36 helicopters per year will be painted at the Sikorsky facility.

The dust collector system DC-4-SIK will be used to expand the helicopter manufacturing capability at Sikorsky. The collection system will consist of an AGET After Filter, Model #FH-58-D2, mounted on a stand with drum covers and one blower model 80E70, 15 hp. The system will operate approximately 16 hours a day, 6 days a week, 52 weeks per year.

- \* The remaining 90% of helicopter exteriors will be painted in paint spray booth PS-13-SIK which is covered under the renewal operation permit application for existing permit No. A0-50-30558.

ATTACHMENT B

Per Chapter 17-2.650 (1)(c), Exceptions to Reasonable Available Control Technology (RACT) are sources whose emissions of volatile organic compounds are not more than 15 pounds (6.8 kilograms) in any one day and not more than 3 pounds (1.4 kilograms) in any one hour. PS-14-SIK and PS-15-SIK will qualify for the exception (See attachment C-Emission Calculations).



## EMISSION CALCULATIONS

PAINT SPRAY BOOTH #PS-14-SIK (MODEL PFA-8-7-T-LH)

Booth will be used to paint interior of helicopters.

Assume 4 gallons of varnish and lacquer per helicopter

Assume 36 helicopters to be painted per year

Assume normal operating time is 4992 hours per year

Per AP-42 Section 4.2 surface coating - assume varnish, lacquer weighs 7.0 lb/gal and emissions = 1540 lb/ton (Table 4.2-1 of AP-42)

Calculations:

$$4 \text{ gal/helicopter} \times 36 \text{ helicopter/yr} = 144 \text{ gal/yr.}$$

$$144 \text{ gal/yr} \times 7 \text{ lb/gal} \times 1540 \text{ lb/ton} \times 1 \text{ ton}/2000 \text{ lb} = 776.16 \text{ lb/yr}$$

$$776.16 \text{ lb/yr} \times 1 \text{ yr}/4992 \text{ hrs} = \underline{0.155 \text{ lb/hr.*}}$$

PAINT SPRAY BOOTH PS-15-SIK (MODEL AA530)

Booth will be used to paint approximately 10% of helicopter exterior.

Assume 1.0 gal of paint and .5 gal. of solvent (for thinning) to paint 10% of helicopter exterior.

Assume 36 helicopters to be painted per year.

Assume normal operating time is 4992 hours per year.

Per AP-42 Section 4.2 Surface Coating - Assume paint weighs 12.5 pounds per gallon (average value) and emissions = 1120 lbs/ton (Table 4.2-1 - AP-42).

Assume solvents weigh 7 lb/gal.

Calculations:

$$1.0 \text{ gal/helicopter} \times 12.5 \text{ lb/gal} \times 1120 \text{ lb/ton} \times 1 \text{ ton}/2000 \text{ lb} \times 36 \text{ helicopters/yr.} = 252 \text{ lb/yr.}$$

$$0.5 \text{ gal/helicopter} \times 36 \text{ helicopters/yr} \times 7 \text{ lb/gal} = 126 \text{ lb/yr}$$

$$\text{Total: } 252 \text{ lb/yr} + 126 \text{ lb/yr} = 378 \text{ lb/yr}$$

$$378 \text{ lb/yr} \times 1 \text{ yr}/4992 \text{ hrs} = 0.076 \text{ lb/hr**}$$

\* Per chapter 17-2.650 (1)(c), exceptions to Reasonable Available Control Technology (RACT) are sources whose emissions of volatile organic compounds are not more than 15 pounds (6.8 kilograms) in any one day and not more than 3 pounds (1.4 kilograms) in any one hour.

\*\* Per chapter 17-2.650 (1)(c), exceptions to Reasonable Available Control Technology (RACT) are sources whose emissions of volatile organic compounds are not more than 15 pounds (6.8 kilograms) in any one day and not more than 3 pounds (1.4 kilograms) in any one hour. Per chapter 17-2.650(1)(f) 14.a.(ii)(G), exterior of airplanes are exempt from Reasonable Available Control Technology (RACT).



ATTACHMENT C  
(Continued)

Dust Collector System (DC-4-SIK)

Assume a maximum of two (2) fifty-five (55) gallon drums filled per month or  
twenty-four (24) drums per year.

Assume sawdust weighs 15 lb/ft.<sup>3</sup>

Assume efficiency of AGET After Filter = 95%

Assume Dust Collector operates 16 hour a day, 6 days a week and 52 weeks a year

$$55 \text{ gal. drum} \times \frac{.13368 \text{ ft.}^3}{\text{gal.}} = 7.35 \text{ ft}^3$$

Calculations

$$7.35 \text{ Ft}^3/\text{drum} \times 15 \text{ lb/ft}^3 \times 24 \text{ drums/year} = 2646 \text{ lb/year}$$

$$2646 \text{ lb/yr} \times 1 \text{ yr}/4992 \text{ hrs} = 0.530 \text{ lb/hr collected in drums}$$

Considering efficiency:

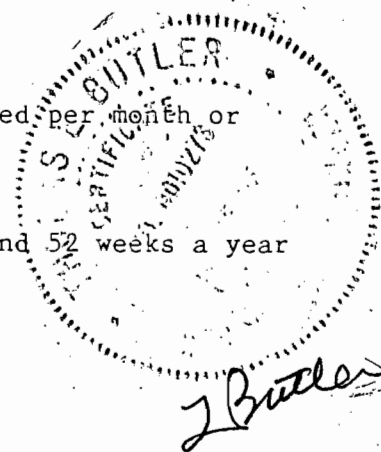
Total dust generated X efficiency = total dust collected in drums

$$\text{Total dust generated} = \frac{\text{total dusts collected in drums}}{\text{efficiency}}$$

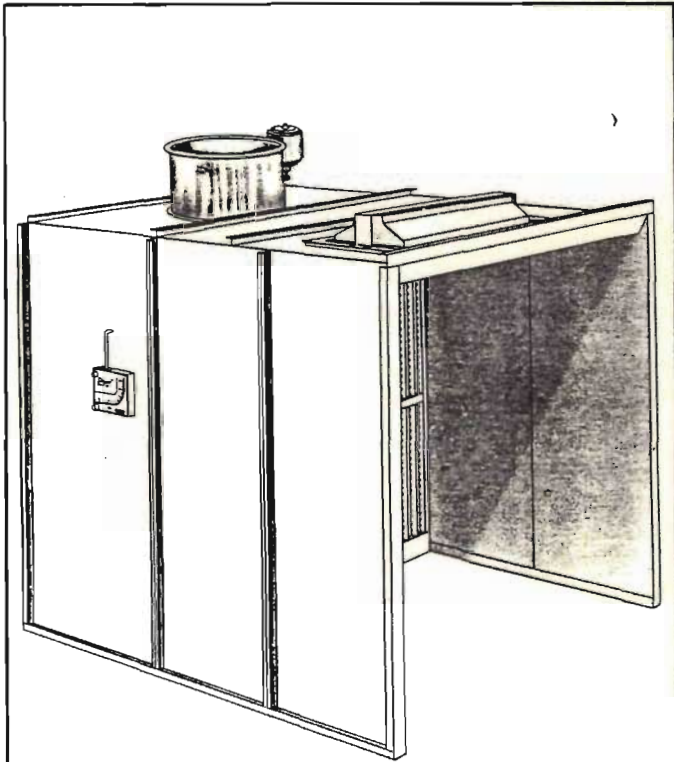
$$\frac{0.530 \text{ lb/hr}}{0.95} = 0.558 \text{ lb/hr}$$

Total dust generated - total dust collected = total dust emitted

$$0.558 \text{ lb/hr} - 0.530 \text{ lb/hr} = 0.028 \text{ lb/hr}$$



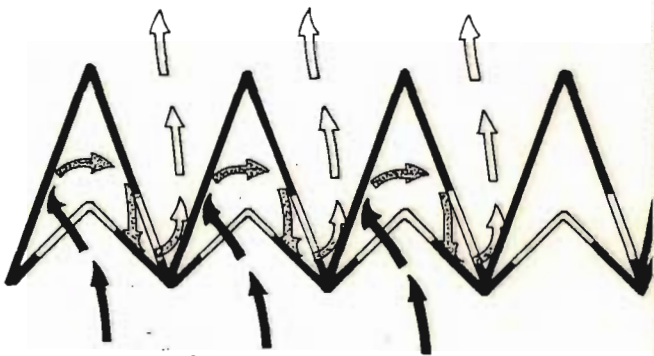
PS-14-SIK



### Andreae Filter Spray Booths

The Binks Andreae filter media is a completely new filtering agent applicable to all dry spray booths. The media is made of special non-fire supporting paper that is formed into double accordian-type folds with staggered holes to provide a highly efficient filter. Paint laden air changes direction four times during its passage through the filter. Each time the air changes direction, paint particles are thrown against the filter surface by centrifugal force and made to adhere there. The large air openings are self-cleaning. They allow large volumes of air to pass in uniform flow, with little loss of efficiency as the media becomes contaminated. Binks Andreae filters last from three to five times longer than pad type filters. Almost any dry filter booth may be converted simply and economically to the Andreae filter media.

Andreae filters have a Class 2 listing by Underwriters Laboratories and are Factory Mutual approved.



### Construction Features

Built of 18 gauge steel panels with exterior flanges. Interior of booth is smooth. Panels are factory painted on both sides.

One or more packs of filter media, 3' x 30', are supplied which can be cut easily to fit booths of any width.

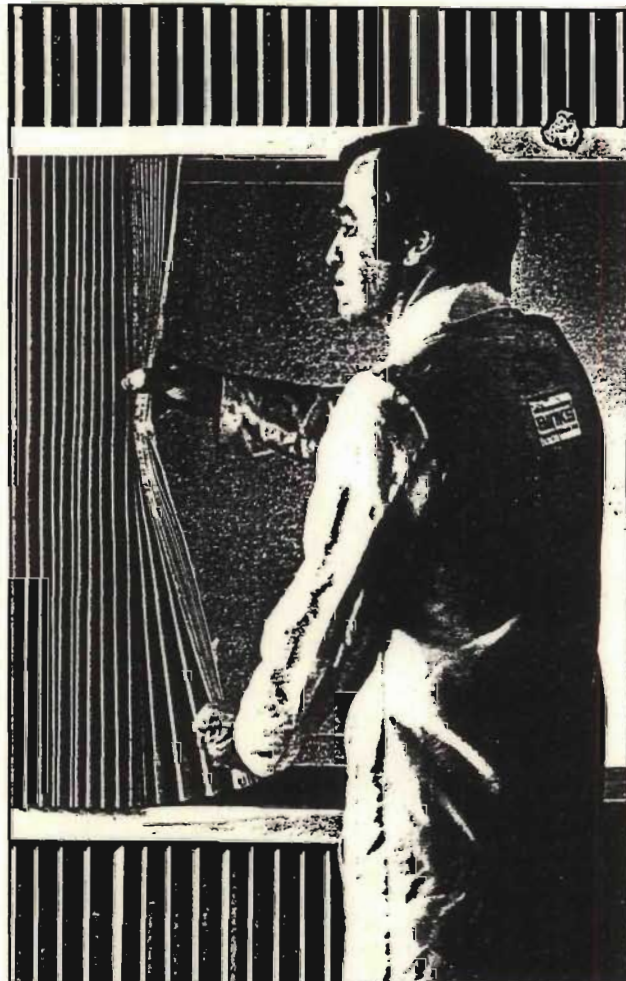
Exhaust Unit & Lighting equipment may be added separately or included in package models.

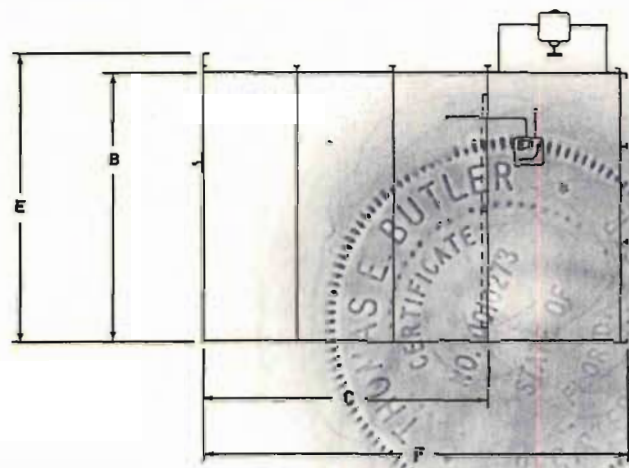
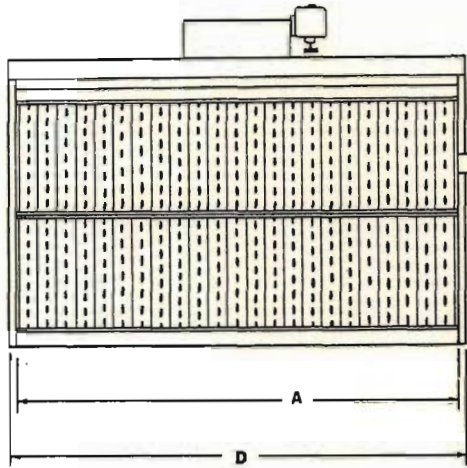
See page 4 for Package Equipment List.

*Butler*

### Filter Replacement

The filter should be installed with eight corrugations to every foot of booth width. To facilitate cutting and positioning, the filter is marked at every eighth corrugation. Clip in one end, stretch across the frame and clip in the other end, an operation taking less than one minute. If any short pieces are left over, they can be attached to a new length, either by a strip of masking tape or by stapling. NOTE: For easy removal of a "loaded" filter, apply a coating of grease to the frame before inserting the filter.





### 7'-0" HIGH 125 FPM MIN. FACE VELOCITY (FLOOR TYPE)

Model Number	Work Dimensions			Overall Dimensions			Air Flow at 1/4" Water Col. SCFM	Fan and Motor†			Qty. Windows & Lights	Shpg. Wt. Lbs.
	A	B	C	D	E	F		Model No.	Dia.	H.P.		
FA-4-7-T	4'-0"	7'-0"	4'-0"	4'-4"	7'-2"	6'-8"	3750	30-1620	18"	3/4	0	550
PFA-4-7-T											0	675
FA-5-7-T											0	575
PFA-5-7-T	5'-0"	7'-0"	4'-0"	5'-4"	7'-2"	6'-8"	4500	30-4200	24"	1/2	0	750
PFA-5-7-T-LH											1	850
FA-6-7-T											0	660
PFA-6-7-T	6'-0"	7'-0"	4'-0"	6'-4"	7'-2"	6'-8"	5600	30-4202	24"	3/4	0	850
PFA-6-7-T-LH											1	950
FA-8-7-T											0	950
PFA-8-7-T	7'-8"	7'-0"	6'-0"	8'-0"	7'-2"	8'-8"	7400	30-4206	24"	1 1/2	0	1150
<b>PFA-8-7-T-LH</b>											1	1250
FA-10-7-T											0	1150
PFA-10-7-T	9'-8"	7'-0"	6'-0"	10'-0"	7'-2"	9'-8"	10000	30-4303	34"	1 1/2	0	1425
PFA-10-7-T-LH											2	1625
FA-12-7-T											0	1300
PFA-12-7-T	11'-8"	7'-0"	6'-0"	12'-0"	7'-6"	9'-8"	11700	30-4305	34"	2	0	1600
PFA-12-7-T-LH											3	1900
FA-16-7-T											0	1950
PFA-16-7-T	15'-8"	7'-0"	7'-6"	16'-8"	7'-10"	11'-2"	13900	30-4307	34"	3	0	2300
PFA-16-7-T-LH											4	2700
FA-20-7-T											0	2600
PFA-20-7-T	19'-8"	7'-0"	7'-6"	20'-8"	8'-0"	11'-8"	18000	30-4410	42"	5	0	3000
PFA-20-7-T-LH											6	3600

### 8'-0" HIGH 125 FPM MIN. FACE VELOCITY (FLOOR TYPE)

Model Number	Work Dimensions			Overall Dimensions			Air Flow at 1/4" Water Col. SCFM	Fan and Motor†			Qty. Windows & Lights	Shpg. Wt. Lbs.
	A	B	C	D	E	F		Model No.	Dia.	H.P.		
FA-4-8-T	4'-0"	8'-0"	4'-0"	4'-4"	8'-2"	6'-8"	4500	30-4200	24"	1/2	0	570
PFA-4-8-T											0	725
FA-5-8-T											0	660
PFA-5-8-T	5'-0"	8'-0"	4'-0"	5'-4"	8'-2"	6'-8"	5600	30-4202	24"	3/4	0	830
PFA-5-8-T-LH											1	930
FA-6-8-T											0	750
PFA-6-8-T	6'-0"	8'-0"	4'-0"	6'-4"	8'-2"	6'-8"	6200	30-4204	24"	1	0	925
PFA-6-8-T-LH											1	1025
FA-8-8-T											0	1100
PFA-8-8-T	7'-8"	8'-0"	6'-0"	8'-0"	8'-2"	8'-8"	8000	30-4207	24"	2	0	1375
PFA-8-8-T-LH											1	1475
FA-10-8-T											0	1300
PFA-10-8-T	9'-8"	8'-0"	6'-0"	10'-0"	8'-2"	9'-8"	10000	30-4303	34"	1 1/2	0	1575
PFA-10-8-T-LH											2	1775
FA-12-8-T											0	1700
PFA-12-8-T	11'-8"	8'-0"	7'-6"	12'-0"	8'-6"	11'-2"	11700	30-4305	34"	2	0	2000
PFA-12-8-T-LH											3	2300
FA-16-8-T											0	2100
PFA-16-8-T	15'-8"	8'-0"	7'-6"	16'-8"	8'-10"	11'-2"	17000	30-4312	34"	5	0	2450
PFA-16-8-T-LH											4	2850
FA-20-8-T											0	2750
PFA-20-8-T	19'-8"	8'-0"	7'-6"	20'-8"	9'-0"	11'-8"	20300	30-4412	42"	5	0	3150
PFA-20-8-T-LH											6	3750

♦ Model number suffix LH indicates booth furnished with dust and ignition proof fluorescent fixtures, Model 29-900, which conform to OSHA requirements for Class I, Div. 2 hazard locations.

† See pages 50 and 51 for exhaust fan specifications.

1. See page 4 for operating components and accessories furnished with above booths.

2. Fluorescent tubes not furnished. Purchase locally.

3. Explosion proof or totally enclosed motor, and motor starter, available at extra cost.

4. Top or back exhaust standard. Specify on order. Consult Binks representative if more than 25 ft. of exhaust duct are required.

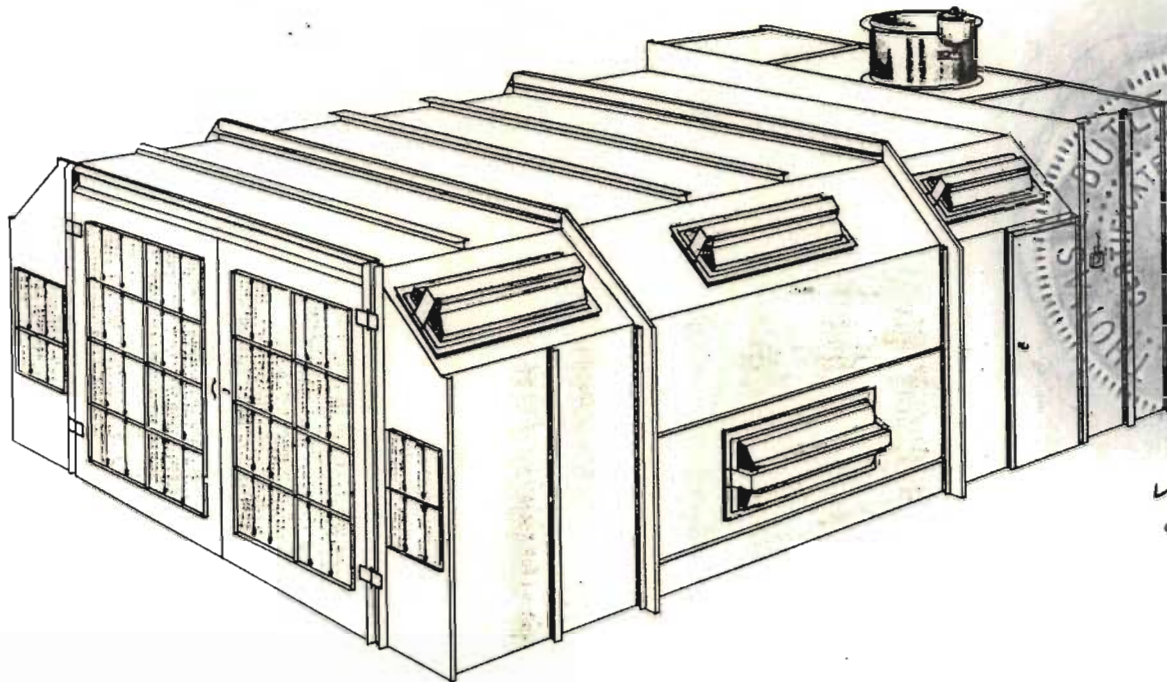
5. Safety monitoring and control devices, as well as complete automatic systems, available at extra cost. Consult local codes and your Binks representative for the equipment most appropriate to your operation.

6. Dirty filter automatic shut-down safety system available at extra cost. See page 58.



## AUTO SPRAY BOOTHS Andreae and Paint Arrestor Exhaust Filters

PS-15-SIK



*Butler*

### General Description of Automotive Package Spray Booths

This Binks Auto Package Spray Booth provides you with a complete automotive painting facility that requires only the "hook-up" to service to be operational. This automotive booth package of housing and equipment gives you an abundant flow-through of uniformly distributed air that is filtered at both inlet and exhaust. Optional equipment of appropriate ducting and outdoor stack components is also available.

### Construction ■

The booth can be supplied with either solid back or with drive-thru doors. The personnel access door, 2'-6" x 6'-9", can be located on either side of the booth.

Floor mounting standard, curb mounting optional; please specify. Curb to be furnished by customer.

### Package Equipment ◆

Two types of exhaust air filters are available. Each type is Factory Mutual approved and carries a Class 2 listing by Underwriters' Laboratories (see page 54).

AA-booth models contain Andreae exhaust filters furnished in sufficient quantity to permit one complete replacement.

AF-models are outfitted with Paint Arrestor exhaust air filters including one complete replacement.

■ See page 27 for complete description of design and construction features.

◆ Additional optional components are shown on pages 44-46 and 51-58.

### Additional Package Equipment

Double Mounting Ring Exhaust Fan (see description below).

Draft gauge to show when exhaust air filters need replacing.

Spun Glass Intake Air Filters.

Windows, Light Fixtures, Brackets, except as noted in table (page 29).

Personnel Access Door.

Caulking Gun, Compound, and White paint for interior of booth.

All nuts, bolts, and fittings.

### Double Mounting Ring Exhaust Fan

Model No. 30-4307, see pages 50 and 51.

Capacity: 12,200 SCFM\*, 100 FPM★

Description: 34" dia. with 3 H.P. open-type ball bearing motor, 230/460V., 60 Hz., 3 Ph. (see table footnote 2, page 29).

\* Air flow at 1/2" w.c. rated static pressure with clean filters and 25 ft. of exhaust duct length.

★ Equivalent air velocity through empty booth with clean filters and 25 ft. max. exhaust duct length.

### Optional Equipment Package for Exhaust Fan

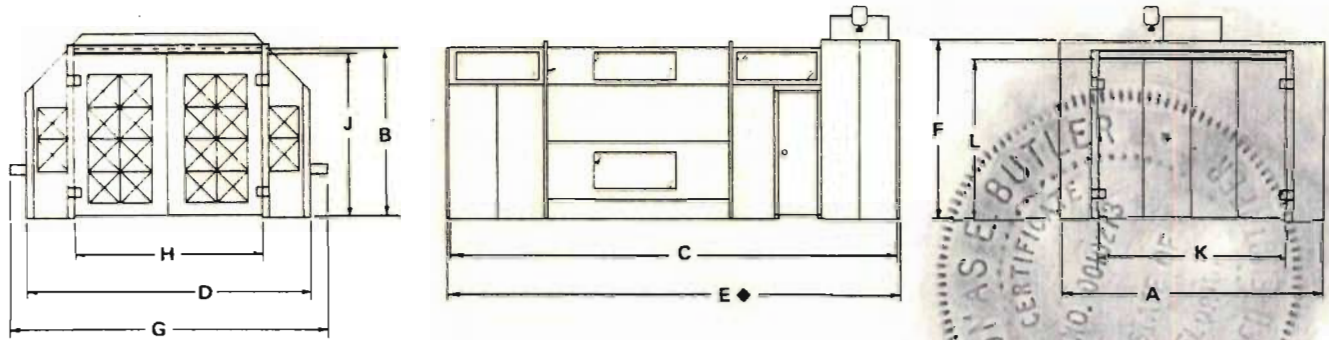
Description	Model No.
(See also Pages 51-53)	
2— Spiral Exhaust Stacks, each 6 ft. long, one with clean-out door, one plain. Each with 2 connector rings.	Specify 34" Dia.
1— Flat Roof Flange †	29-31
1— Weather Canopy with automatic damper.	29-95
1— Connector Ring	29-588

† For pitched roof, specify 29-35 Pitched Roof Flange.

ATTACHMENT D2

# AUTO SPRAY BOOTHS

## Andreae and Paint Arrestor Exhaust Filters



Booth clearance, all around, 3 ft. recommended.

100 FPM Min. Face Velocity at 1/2" w.c. static press. with empty booth, clean filters, 25 ft. max. exhaust duct length.

Model Numbers ■		Work Dimensions			Overall Dimensions				Nominal Door Opening (see note below)				Lights (quantity)		Shpg. Wt. Lbs.
Andreae Filters	Paint Arrestor Filters	A	B	C	D	E ◆	F	G	Front		Back		L.H. ▼	L.O. ▲	
AA-510	AF-510	<b>Solid Back Models</b>													
AA-530	AF-530														
AA-531 ●	AF-531 ●	14'-0"	9'-0"	26'-0"	15'-1"	26'-4"	9'-6"	15'-6"	10'-0"	8'-6"	—	—	0	0	4800
AA-550	AF-550												0	8	5200
AA-551 ●	AF-551 ●												0	8	5900
AA-550	AF-550												8	0	5400
AA-551 ●	AF-551 ●												8	0	6100
AA-610	AF-610	<b>Drive-Thru Models</b>													
AA-630	AF-630														
AA-631 ●	AF-631 ●	14'-0"	9'-0"	26'-0"	15'-1"	26'-4"	9'-6"	15'-6"	10'-0"	8'-6"	11'-6"	7'-8"	0	0	5300
AA-650	AF-650												0	8	5700
AA-651 ●	AF-651 ●												0	8	6400
AA-650	AF-650												8	0	5900
AA-651 ●	AF-651 ●												8	0	6600

- Furnished with 8 windows; 12 windows available on request.
  - Furnished with optional equipment package for exhaust fan.
  - ◆ When ordering Attached Air Make-up Systems, add 2'-6" to dimension shown (see pages 44-46).
  - ▼ For Class I, Div. 2 hazard locations. Model 29-900. See page 55.
  - ▲ Open-type fluorescent fixtures, Model 29-97. See page 55.
1. Fluorescent tubes not furnished. Purchase locally.
  2. Explosion proof or totally enclosed motor, and motor starter, available at extra cost. See pages 50 and 51 for exhaust fan specifications.

3. Top exhaust standard. Back exhaust optional. Specify on order. Consult Binks representative if more than 25 ft. of exhaust duct are required.
4. Safety monitoring and control devices, as well as complete automatic systems, available at extra cost. Consult local codes and Binks representative for the equipment most appropriate to your operation.
5. Observation windows, clear wire-glass, available at extra cost. Specify quantity and location.
6. Special length booths available. Please consult your Binks representative.

### REALLY CLEAN Version

Solid Back Models may also be obtained in the "Really Clean" version (see pages 34 and 35). Please consult your Binks representative.

**Note:** For bifold doors, subtract 1'-6" for "pass-thru" width clearance.

For width of one-piece doors, and for all listed height openings, subtract 2" for "pass-thru" clearance.

# AGET<sup>®</sup>

# DUSTKOP<sup>®</sup>



DC-4-SIK (BLOWER)

FLORIDA FILTERS, INC.

## EXHAUSTERS

Call our local number in these cities:

Aget Exhausters are engineered to move quantities of air for ventilation, dust removal, circulation, fume emission and ecological improvement of in-plant work areas.

The wide range in Exhauster sizes and capacities makes them adaptable to a broad variety of conditions.

Sturdy construction insures low maintenance and low operating costs. Shipped completely assembled for easy installation.

FT. LAUDERDALE

763-4460

DADE COUNTY

352-8548

MIAMI

781-1846

ORLANDO

407-2523

WINTER

407-2523

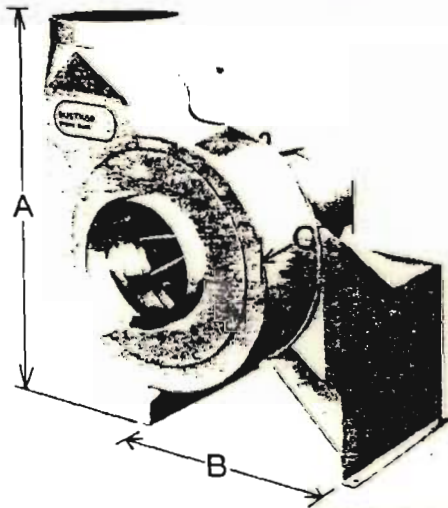
YULEE

904-2523

Aget Direct Drive Exhausters are for use where a volume of air not exceeding 3,200 cubic feet per minute is to be handled. They can be used for dust, smoke, and fume removal, clean air injection or for accessory use with machinery in production equipment.

• Case aluminum alloy fans. Modern design permits easy access to motor and direct drive. Spark proof fan. All steel shell, welded, heavy gauge.

### DIRECT DRIVE EXHAUSTERS



#### EXHAUSTER SPECIFICATIONS

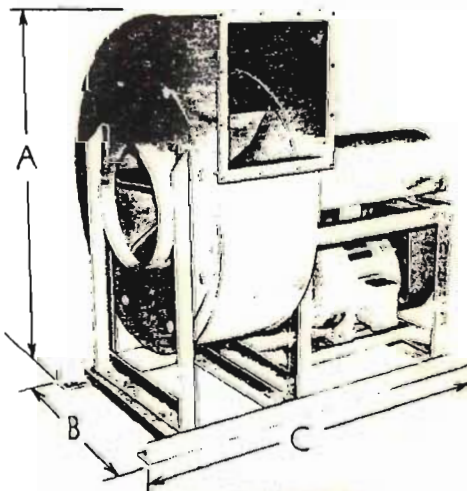
Model Number	HP	RPM	Shipping Weight	Dimensions	Electrical Specifications	Recommended Operating Range
5E20	1/2	3450	50 lbs.	A-19 1/2" B-11" C-12 1/2"	115/1/60 208/3/60 230/460/3/60	200 to 600 C.F.M. at pressure requirements 4" to 2.9".
8E50	3/4	3450	105 lbs.	A-28 1/2" B-16" C-16"	115/1/60 208/3/60 230/460/3/60	300 to 800 C.F.M. at pressure requirements 5.25" to 2.5".
11E51	2	3450	135 lbs.	A-30 1/2" B-18" C-18"	208/3/60 230/460/3/60	600 to 1200 C.F.M. at pressure requirements 7" to 4.5".
20E31	5	3450	210 lbs.	A-33 1/4" B-21" C-22"	208/3/60 230/460/3/60	800 to 2600 C.F.M. at pressure requirements 8.8" to 4.6".
30E51	10	3450	260 lbs.	A-38" B-21" C-26"	208/3/60 230/460/3/60	1200 to 3200 C.F.M. at pressure requirements 10.7" to 3.2".

*Y Butler*

#### EXHAUSTER & AFTER-FILTER

Aget After-Filters can be equipped with Aget Exhausters. Exhausters can be used for conventional or pressure through applications. Size Exhauster is determined by type and volume of dust to be removed and the size of Alt Filter.

### BELT DRIVE EXHAUSTERS



Aget Belt Drive Exhausters are for use where CFM requirement ranges from 3,200 CFM to 14,500 . . . to force air through ducting from one area to another, to ventilate large work or storage areas, to remove air-borne contaminants from work area, for clean air injection, last collection.

• Completely assembled for easy installation. • Free air flow. • Quiet. • Easy access to motor, belt drive and bearings. • Each fan designed for compatibility with CFM capacity. • Fan outlets rotate in four positions.

#### EXHAUSTER ELECTRICAL SPECIFICATIONS AND RECOMMENDED OPERATING RANGE

##### BELT DRIVE

Model Number	HP	RPM	Electrical Specifications	Recommended Operating Range	Dimensions	Shipping Weight
60E70	10	1800	208/3/60 230/460/3/60	2400 to 4750 C.F.M. at pressure requirements 0" to 7.2".	A-41 1/2" B-21 1/2" C-41 1/2"	695 lbs.
* 80E70	15	1800	208/3/60 230/460/3/60	3000 to 7250 C.F.M. at pressure requirements 0" to 10.1".	A-46-11/16" B-24 1/2" C-49 1/2"	910 lbs.
90E70	30	1800	208/3/60 230/460/3/60	7000 to 11,500 C.F.M. at pressure requirements 0" to 10"	A-53 1/2" B-27 1/2" C-56 1/2"	1265 lbs.

#### EXHAUSTER & FILTERKOP

FILTERKOPS can be used with Aget EXHAUSTERS. Size of Exhauster is determined by type and volume of dust to be collected. FILTERKOP can be ordered with mounting plate to hold Exhauster.

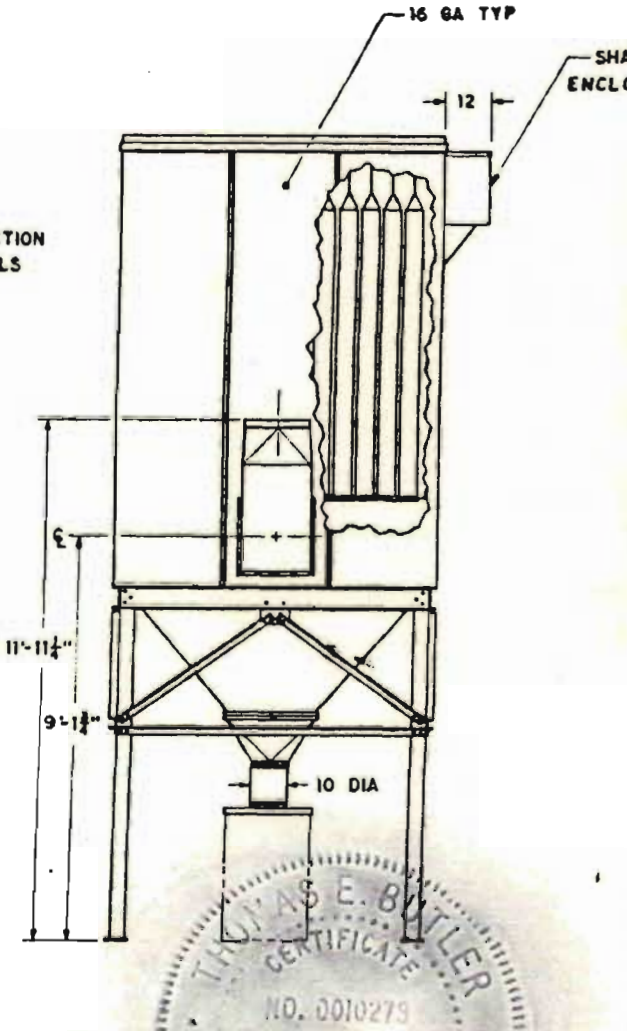
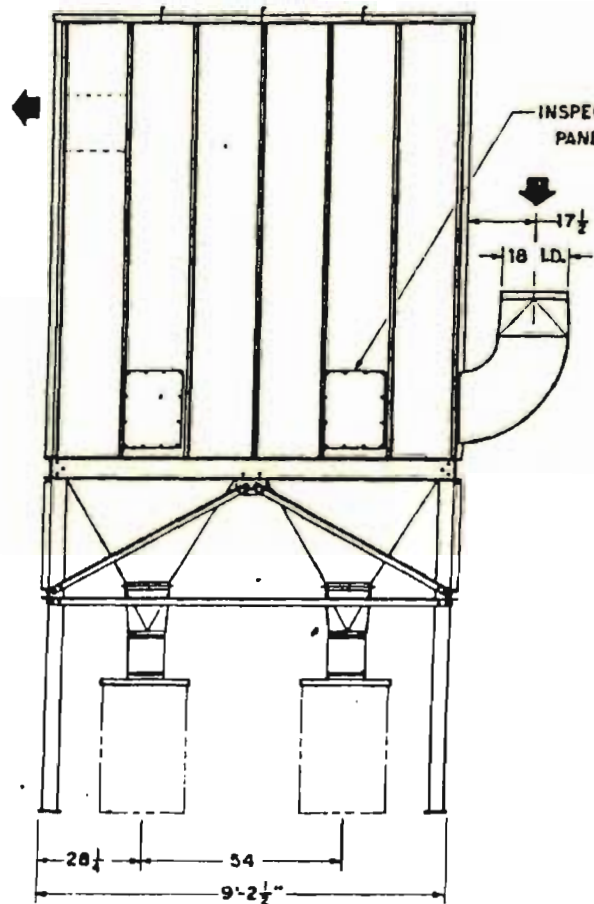
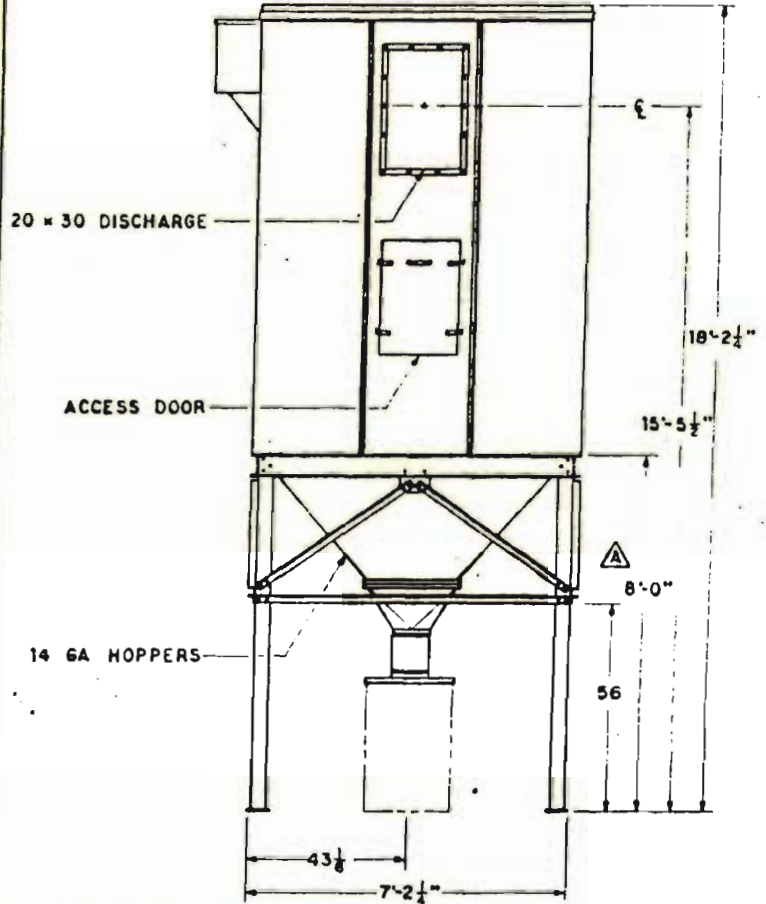
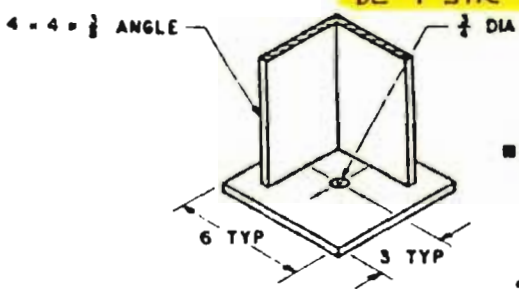
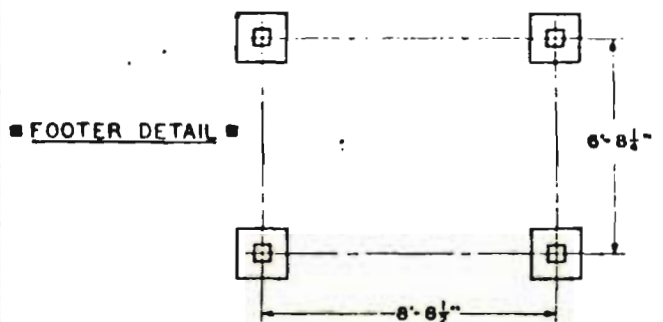
SEE OTHER SIDE FOR CAPACITY TABLES

# AGET MANUFACTURING COMPANY

PO Box 248 • ADRIAN, MICHIGAN 49221 • Telephone, 517/263-5781

ATTACHMENT D3 (CONTINUED)

DC-4-SIK (AFTER FILTER)



7. APPROXIMATE SHIPPING WEIGHT-- 4325 LBS
6. SHAKER MOTOR SPECIFICATIONS AND FILTER TUBE MATERIAL SPECIFICATIONS CALLED OUT ON THE PURCHASE ORDER
5. TOTAL FILTER AREA - 1400 SQ. FT.
4. DUST STORAGE CAPACITY - 14.7 CU. FT.
3. RECOMMENDED FOOTER CONSTRUCTION PER PRINT NO. FH58-A-102 OR AS SPECIFIED BY LOCAL CODE
2. INLET MAY BE INDEXED IN 90° INCREMENTS TO OBTAIN DESIRED ORIENTATION
1. CUSTOMER TO SUPPLY TWO 55 GALLON DRUMS FOR DUST STORAGE

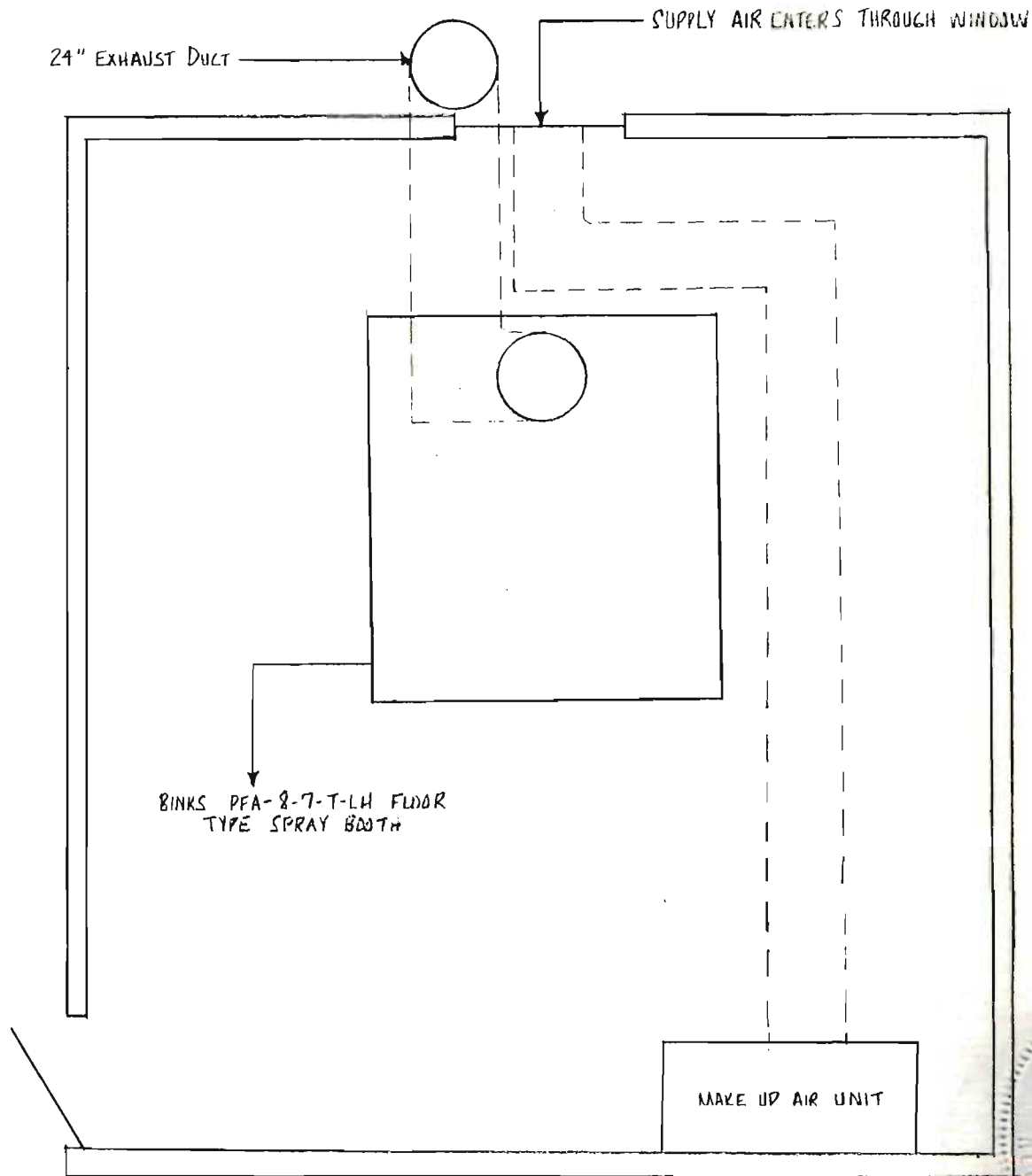
NOTE

THOMAS E. BUTLER  
CERTIFICATE  
NO. 0010275  
STATE OF OHIO  
REGISTERED

*Butler*

AGRY INC CO	ADRIAN MICH
DATE 1/27/70	TIME 1/27/70
MOODL NO	FH58-20
PRINT NO	FH58-C-321

legs were 8'-4" high  
redrawn

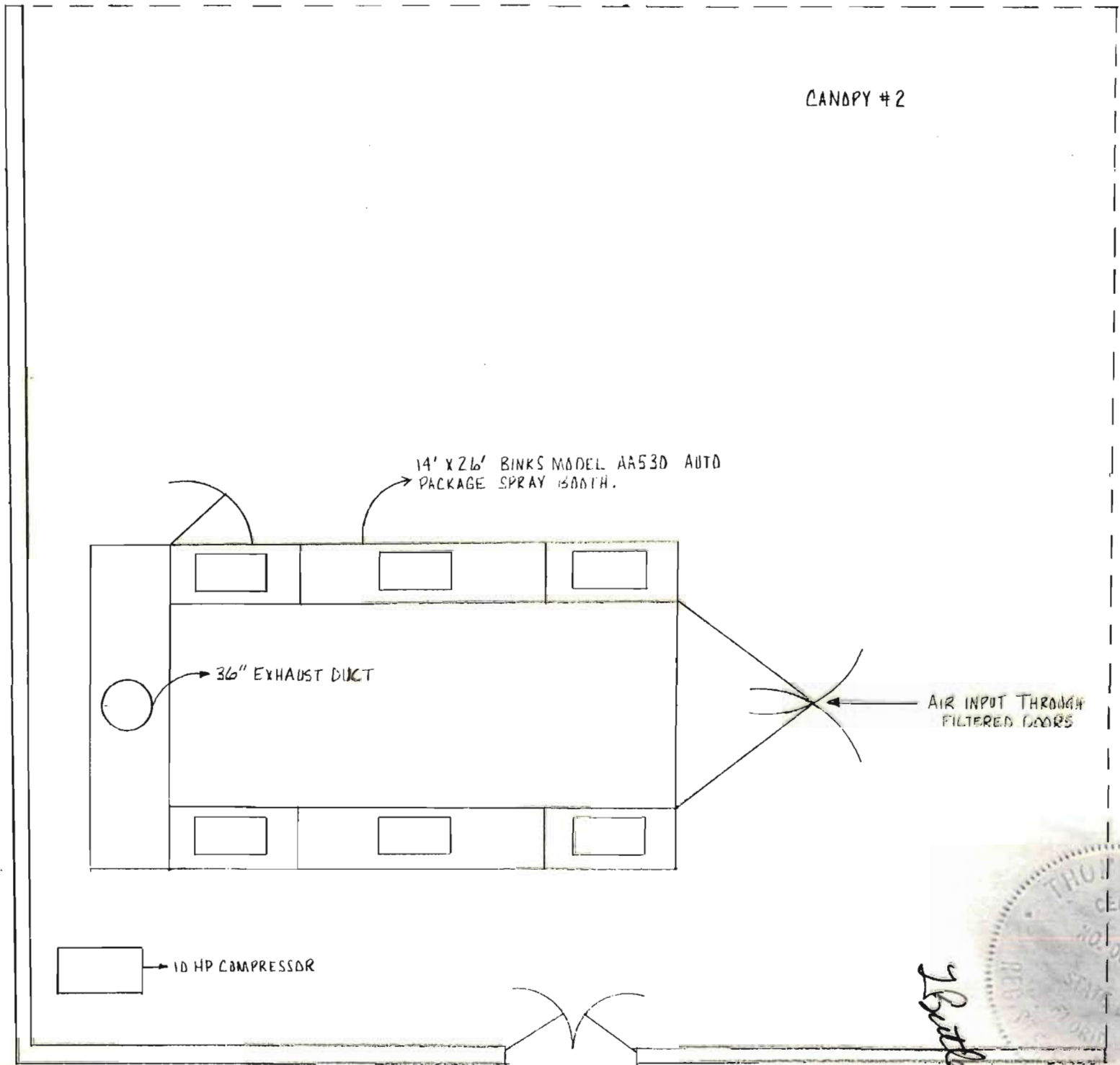


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PS-15-SIK

ATTACHMENT E2

CANDPY #2



14' X 26' BINKS MODEL AA53D AUTO PACKAGE SPRAY BOOTH.

36" EXHAUST DUCT

AIR INPUT THROUGH FILTERED DOORS

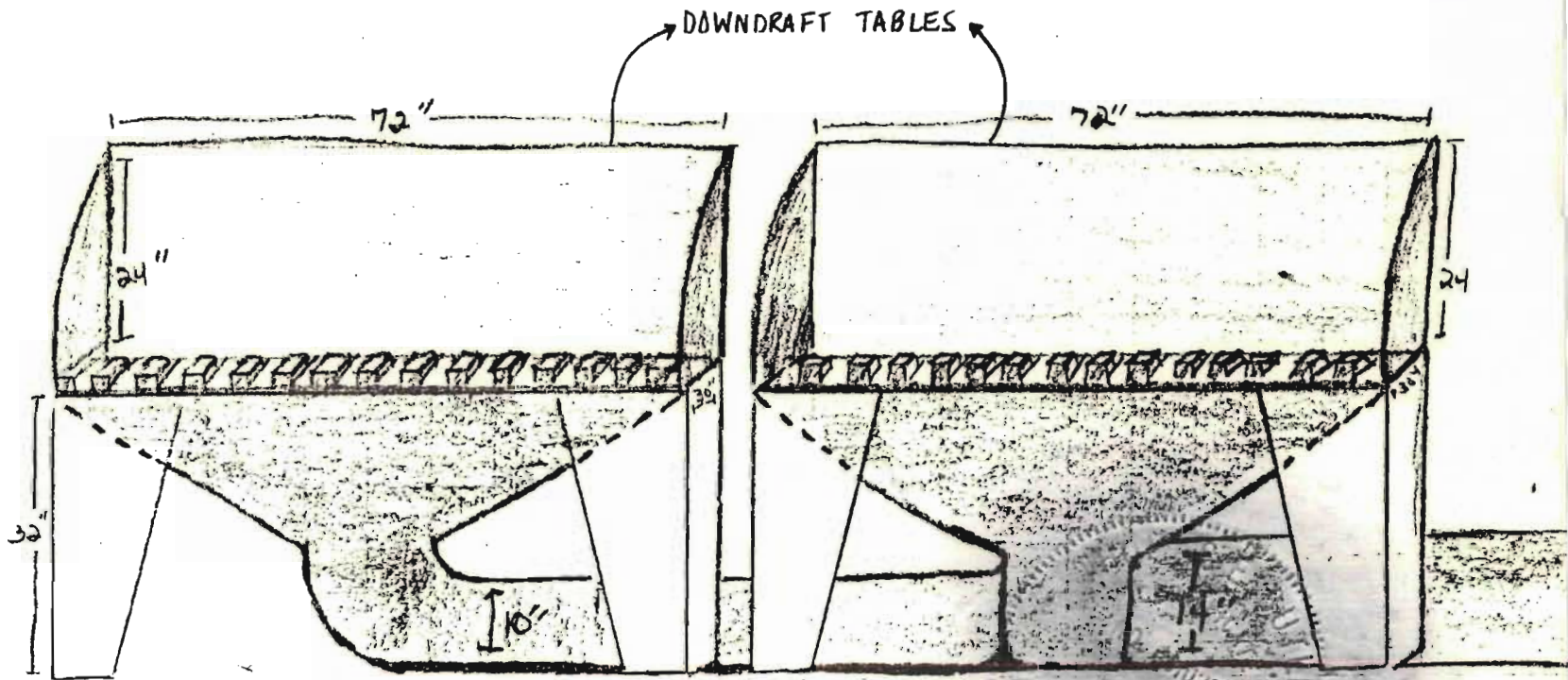
10 HP COMPRESSOR

*T Butler*



DC-4-SIK

INSIDE



*Butler*

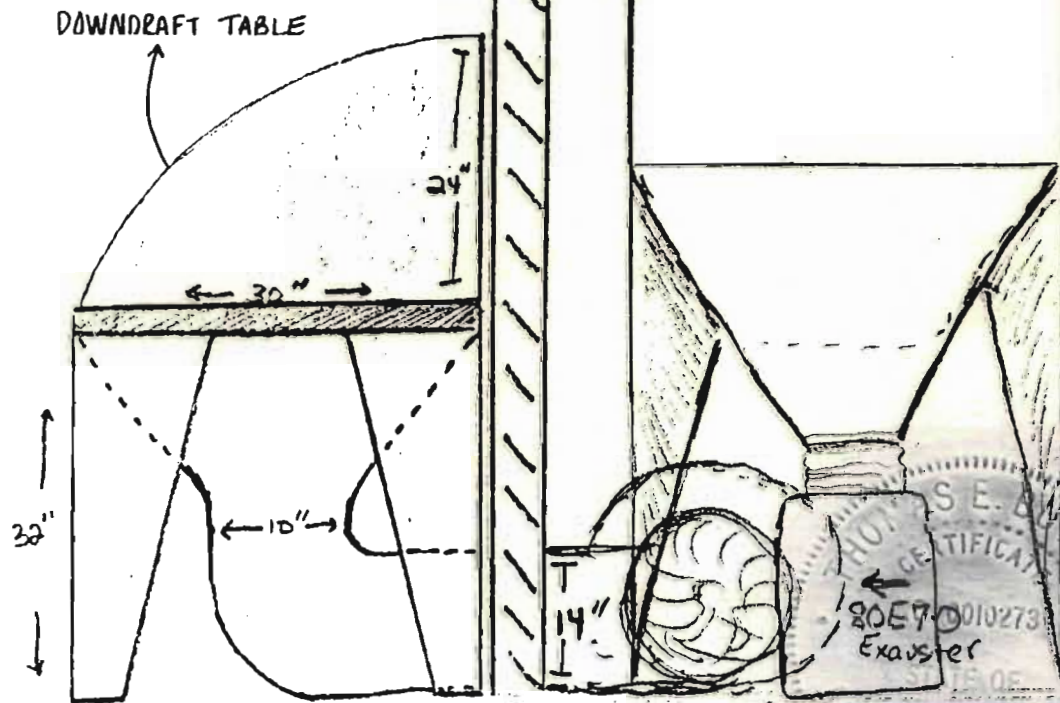


DC-4-SIK

Inside

outside

FH-58-2D

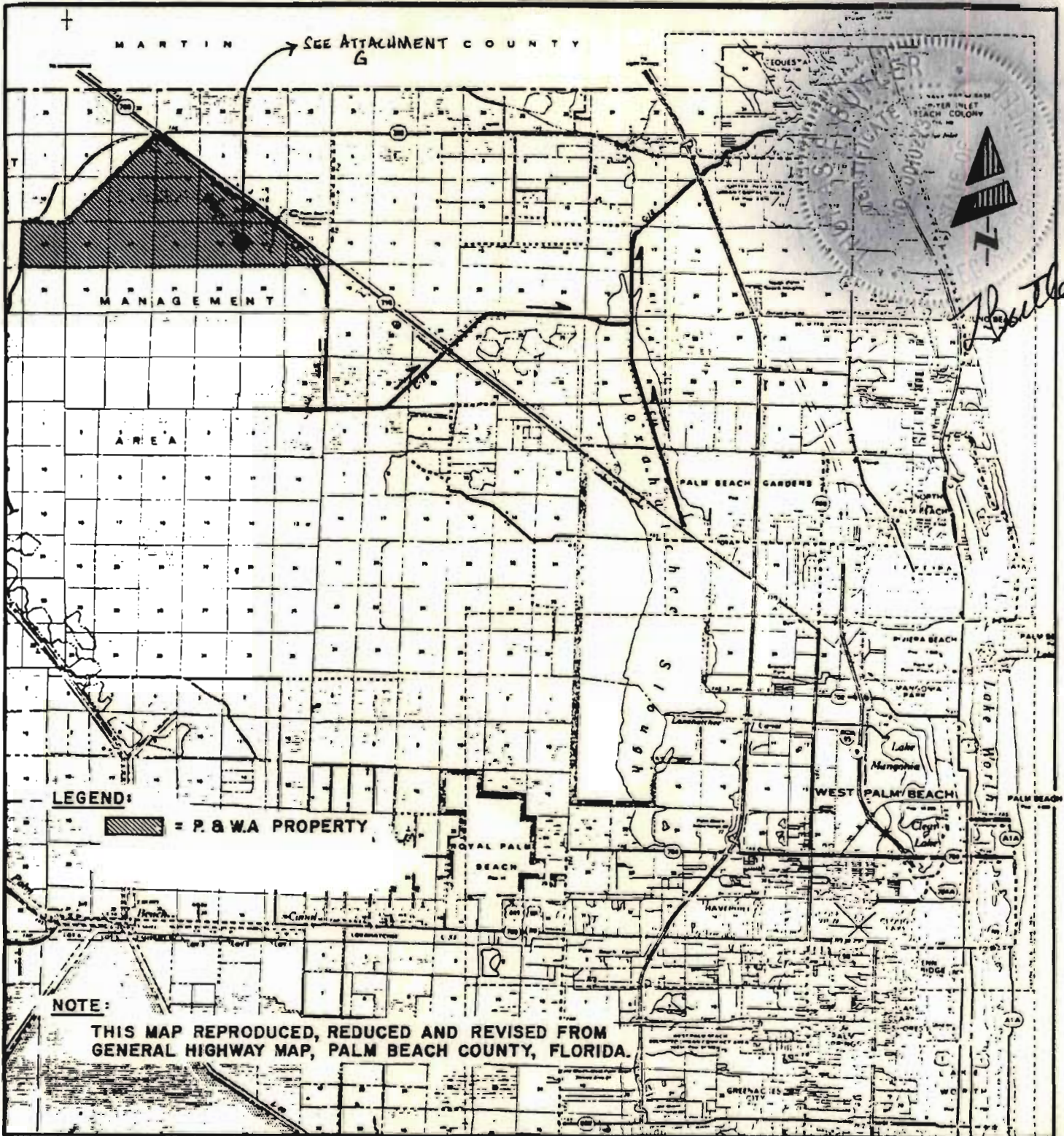


INSIDE / OUTSIDE ELEVATION OF DUST COLLECTOR SYSTEM

*W. J. Taylor*

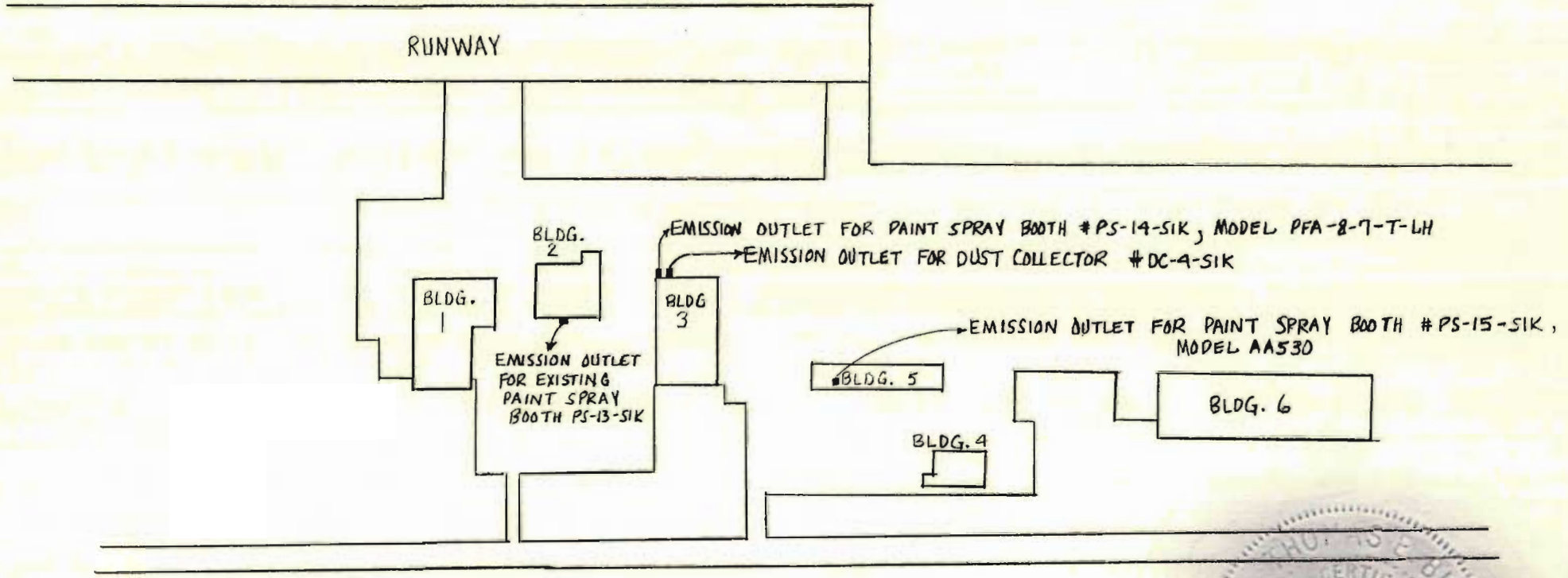






PL-772 A  
 7/18/81

**SITE LOCATION MAP  
 FOR PRATT & WHITNEY AIRCRAFT PROPERTY  
 PALM BEACH COUNTY, FLORIDA**



SIKORSKY AIRCRAFT

*Handwritten signature*

