Chemring Ordnance, Inc.

Facility ID No. 1230047
Taylor County

Title V Air Operation Permit Renewal

Permit No. 1230047-006-AV
(Renewal of Title V Air Operation Permit No. 1230047-003-AV)

Permitting & Compliance Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Northeast District
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590
Telephone: (904) 256-1700
Fax: (904) 448-4363

Title V Air Operation Permit Renewal

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Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

PERMITTEE:
Chemring Ordnance, Inc.
10625 Puckett Road
Perry, Florida 32348

Permit No. 1230047-006-AV
Facility Id No. 1230047
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing facility is located in Taylor County at 10625 Puckett Road (SR 361 A, 12 miles SW of Perry, FL), Perry, Taylor County; UTM Coordinates: Zone 17, 243.3 km East and 3318.3 km North; and, Latitude: 29°58′13″ North and Longitude: 83°39′37″ West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: **February 22, 2012**
Renewal Application Due Date: **July 18, 2016**
Expiration Date: **February 22, 2017**

Khalid Al-Nahdy

Khalid A. Al-Nahdy, P.E.
District Air Program Administrator

KAA/jw

Subsection A. Facility Description.

Chemring Ordnance, Inc. is a small to medium size explosive and pyrotechnic device manufacturer. Facility processes include Raw Material/Product Storage, Production, Plating Operations, Test Facilities, Thermal Treatment, and Fuel storage.

Chemring Ordnance, Inc. has various production lines located throughout the plant. Each of the products manufactured by the plant is done so through a dedicated production line. The production of pyrotechnics generally consists of blending, forming, packaging/encasing, and shipment preparation.

Hand grenade fuse parts are produced through the following processes: captive zinc die casting, vibratory deburring, noncyanide alkaline zinc electroplating and noncyanide chromate conversion coating operations. These processes are conducted on an intermittent basis, dependent upon contract requirements and schedules. The chromate conversion coating and zinc electroplating waste streams are individually chemically treated in the Industrial Wastewater Treatment Plant. Testing facilities are used to verify that the products manufactured meet contract specification.

The Open Burn Unit consists of a single unit limerock pad, which includes four diked concrete containment pads. Pans are used on each containment pad. The Open burn Unit receives all waste residues, pyrotechnic powders, contaminated containers, and waste industrial materials contaminated with pyrotechnic powders, metal bearing pyrotechnic powders and solvent (Acetone) contaminated pyrotechnic powders. The Open Burn Unit shall be operated in accordance with the RCRA operation permit.

The Sludge Dryer dries industrial wastewater treatment sludge. Upon inspection and rule review it has been determined that the Sludge Dryer (EU No. 003) is **not** subject to the requirements of 40 CFR 61, Subpart E, National Emission Standards for Mercury. The unit is fired by propane gas burners which provide infrared heat to dry the sludge. Direct flame is not applied to the sludge nor are the combustion gases from the propane burners used directly to heat the sludge. The burners are located above the sludge and the combustion gases are vented to a wet scrubber prior to venting to the atmosphere. Based upon the design and operational characteristics the unit does not meet the definition of Sludge Dryer as defined in 40 CFR 61, Subpart E. The unit will be classified as an insignificant emission unit.

Based on the Renewal Title V permit application received **July 21, 2011,** this facility is a major source of hazardous air pollutants (HAPs), Volatile Organic Compounds (VOCs), and Carbon Monoxide (CO).

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Open Burn Unit
002	Facility Wide Operations including Multiple Emission Points

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received July 21, 2011, this facility is a major source of hazardous air pollutants (HAP), Volatile Organic Compounds (VOC), and Carbon Monoxide (CO). The facility operates a plating and polishing operation which is **not** subject to regulation under 40 CFR 63, Subpart WWWWWW – National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, since this regulation only applies to affected plating and polishing operations at area sources of HAPs. The existing facility is not a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	**EU No(s).**
Rule 62-4, F.A.C.	001, 002
Rule 62-210, F.A.C.	001, 002
Rule 62-213, F.A.C.	001, 002
Rule 62-296, F.A.C.	Facility

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated.

[Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. **Not federally Enforceable.** Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

[Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.

[Rule 62-296.320(1), F.A.C.]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.

[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Maintenance of paved areas/paved parking areas as needed;
b. Reduced speed for vehicular traffic; and
c. Implementation of good housekeeping practices.

[Rule 62-296.320(4)(c), F.A.C.; and, proposed by applicant in Title V air operation permit application received January 21, 2011]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.

[Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm

[Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.

[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA).

a. As required by Section 112(r)(7)(B)(iii) of the CAA and 40 CFR 68, the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
b. As required under Section 252.941(1)(c), F.S., the owner or operator shall report to the appropriate representative of the Department of Community Affairs (DCA), as established by department rule, within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the United States Environmental Protection Agency under Section 112(r)(6) of the CAA.
c. The owner or operator shall submit the required annual registration fee to the DCA on or before April 1, in accordance with Part IV, Chapter 252, F.S., and Rule 9G-21, F.A.C.
d. Any required written reports, notifications, certifications, and data required to be sent to the DCA, should be sent to: Department of Community Affairs, Division of Emergency Management, 2555 Shumard Oak Boulevard, Tallahassee, FL 32399-2100, Telephone: (850) 413-9921, Fax: (850) 488-1739.
e. Any Risk Management Plans, original submittals, revisions, or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
f. Any required reports to be sent to the National Response Center, should be sent to: National Response Center, EPA Office of Solid Waste and Emergency Response, USEPA (5305 W), 401 M Street SW, Washington, D.C. 20460, Telephone: (800) 424-8802.
g. Send the required annual registration fee using approved forms made payable to: Cashier, Department of Community Affairs, State Emergency Response Commission, 2555 Shumard Oak Boulevard, Tallahassee, FL 32399-2149
[Part IV, Chapter 252, F.S.; and, Rule 9G-21, F.A.C.]

Subsection A. Emissions Unit 001

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
-001	**Open Burn Unit (OBU)** The OBU consists of a single lime rock pad which includes four diked concrete containment pads. Pans are used on each containment pad. The OBU receives all waste residues (including but not limited to all reactive pyrotechnic powder/composite cuttings, shavings, residues, slurries, and unacceptable parts and contaminated industrial materials (hazardous waste code D003), pyrotechnic powders, contaminated containers, and waste industrial materials contaminated with pyrotechnic powders, metal bearing pyrotechnic powders, and solvent contaminated pyrotechnic powders (including but not limited to pyrotechnic powder/composite cuttings, shavings, residues, slurries, and unacceptable parts which may also carry hazardous waste codes D005 (Barium), D006 (Cadmium), D007 (Chromium) and D008 (Lead), F002, F003 and F005 . These wastes are sent to the OBU from the production areas of the facility. A record of all wastes received and handled at the OBU are maintained in the area logbook. The OBU is operated in accordance with the RCRA operation permit No. 16099-008-HO, permit No. 16099-010-HO, and it's successors.

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum thermal treatment charge rate shall not exceed 500 pounds of hazardous waste per day. The amounts/quantity listed as the maximum burn batch size in Sub attachment II.0.3-1(1) of the Hazardous Waste Permit application shall not be exceeded for any of the waste streams.
[RCRA Permit 16099-008-HO, RCRA Permit 16099-008-HO, and it's successors, Rule 62-4.070. F.A.C.]

A.2. Method of Operation. The hazardous waste facility will be operated for the thermal treatment of reactive pyrotechnic powder/composite cuttings, shavings, residues, slurries, and unacceptable parts and contaminated industrial materials (hazardous waste code D003). The pyrotechnic powder/composite cuttings, shavings, residues slurries, and unacceptable parts may also carry hazardous waste codes D005, D006, D007, and D008. The contaminated industrial materials may also carry hazardous waste codes D005, D006, D007, F002, F003, and F005.
[RCRA Permit 16099-008-HO, RCRA Permit 16099-008-HO, and it's successors, Rule 62-4.070. F.A.C.]

A.3. Hours of Operation. The hours of operation for this emissions unit shall occur only between 8:00 A.M. and 5:00 P.M., Monday through Friday (**2180 hours/year**).
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; [RCRA Permit 16099-006-HO, RCRA Permit 16099-008-HO, RCRA Permit 16099-008-HO, and it's successors, Rule 62-4.070. F.A.C., Stated by applicant in the renewal Title V permit application received July 21, 2011]

A.4. Annual Operating Report. Total HAP emissions and total VOC emissions in tons shall be recorded monthly and reported annually.
[Rule 62-210.370(3), F.A.C.]

A.5. The permittee shall maintain records of the operating hours of this emission unit. The calendar year total operating hours shall be submitted to the Department in the Annual Operating Report.
[Rule 62-4.070, F.A.C.]

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
-002	**Facility Wide Operations including Multiple Emission Points** Various operations at the facility (Raw Material/Product Storage, Production, Plating Operations, Test Facilities, and Fuel Storage) are listed in this EU. The facility operates a plating line and associated wastewater treatment plant. Manufacturing processes include captive zinc die-casting, vibratory deburring, noncyanide alkaline zinc electroplating, and noncyanide chromate conversion coating operations. Pyrotechnics Materials Production lines exist throughout the facility. Depending on the product manufactured the lines generally consist of blending, forming, packaging/casing, and preparation for shipment. Production of Red Phosphorous Marine Marker and additional supplementary explosive charge production will be added in the future. Testing operations facilities are located throughout the complex. They are used to verify that the manufactured products meet strict quality assurance standards. Raw material and storage operations are located throughout the complex. Due to safety requirements materials are segregated in various structures generally separated by sufficient distance to reduce explosives hazards.

Essential Potential to Emit (PTE) Parameters

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Hours of Operation. The hours of operation for this emissions unit shall not exceed 16 hours/day, 5 days/week, 48 weeks/year **3840 hours/year**.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Stated by applicant in the renewal Title V permit application received July 21, 2011]

Recordkeeping and Reporting Requirements

B.2. The permittee shall submit a Statement of Compliance with all terms and conditions of the permit. {See condition RR7, APPENDIX RR, FACILITY-WIDE REPORTING REQUIREMENTS }.
[Rule 62-213.440(3), F.A.C.].

B.3. The permittee shall maintain records of the operating hours of this emission unit. The calendar year total operating hours shall be submitted to the Department in the Annual Operating Report.
[Rule 62-4.070, F.A.C.]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TV, Title V General Conditions.