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

APPLICANT

The applicant for this project is Chemring Ordnance, Inc. The applicant's responsible official and mailing address are: Mr. Keith Funkhouser, President, Chemring Ordnance, Inc., 10625 Puckett Road, Perry, Florida 32348.

FACILITY DESCRIPTION

The applicant operates the Perry Facility, which is an existing manufacturer of small to medium size explosive and pyrotechnic devices. The Perry facility is located in Taylor County at SR 361A, 12 miles SW of Perry, Taylor Co., Florida.

The facility processes include Raw Material/Product Storage, Production, Plating Operations, Test Facilities, Thermal Treatment, and Fuel storage.

There facility 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 is operated in accordance with the RCRA operation permit.

Also included in this permit are insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued March 5, 2007
Title V Air Operation Permit Administrative Correction issued March 30, 2007
Title V Air Operation Permit Administrative Correction issued October 1, 2010
Application for a Title V Air Operation Permit Renewal received July 21, 2011
Notice of Intent to Issue Air Permit issued October 19, 2011
Public Notice of Intent to Issue Air Permit published on October 26, 2011
Proof of Publication of Public Notice of Intent to Issue Air Permit received November 28, 2011
Proposed Permit issued on December 29, 2011

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD) major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does not operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 61.

Note: It has been determined that the sludge dryer is not subject to the requirements of 40 CFR 61 Subpart E: National Emission Standard for Mercury, since it does not meet the **definition** of sludge dryer under 40 CFR 61 Subpart E: National Emission Standard for Mercury.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

PROJECT REVIEW

The following changes were made to the Title V Air Operation Permit renewal:

1. The renewal has been reformatted in accordance with the new Title V format effective in 2010, including new applicable appendices.

2. Unregulated emission point nos. 01 through 07 and 18 have been determined to be insignificant emission units/or activities and have been added to the list of insignificant activities. Unregulated emission point nos. 08, 10 through 13, 15, and 16 have been incorporated into Emission Unit 002 (Facility Wide Operations including Multiple Emission Points). Emission point no. 17 (Open Burning and Functional Testing) has been divided into two parts as follows: a. Open Burning is now part of Emission Unit 001 (Open Burning Unit) and b. Functional Testing is now part of Emission Unit No. 002 (Facility Wide Operations including Multiple Emission Points). There is not a list of unregulated emission units associated with this permit (1230047-006-AV).

3. Conditions have been added to EU Nos. 001 and 002 requiring that the permittee record and submit operating hours for each EU since operation of each EU is restricted to less than 8760 hours per year.

4. 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.

5. The following condition has been removed from the Proposed Permit since it duplicated FW condition No. 7:

{10. 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.]}

CONCLUSION

This project renews Title V air operation permit No. 1230047-003-AV, which was issued on March 5, 2007. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.