TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Rockwell Collins, Inc.
1100 W. Hibiscus Blvd.
Melbourne, FL 32902

Rockwell Collins, Inc.

Facility ID No. 0090165

PROJECT

Project No. 0090165-009-AC
Application for Non-Title V Air Construction Permit
Project Name: Construction of Spray Systems

COUNTY

Brevard County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste and Air Resource Programs
Central District Office
3319 Maguire Blvd., Ste. 232
Orlando, Florida 32803-3767
DEP_CD@dep.state.fl.us

December 16, 2014

Prepared by Kim Rush, P.E.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

GENERAL PROJECT INFORMATION

Air Pollution Regulations

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

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

Glossary of Common Terms

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

I. Project Description:

A. Applicant:

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B. Professional Engineer:

Mr. Douglas Bauman, P.E.
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C. Application Contact:

Mr. Kory Kunde, ESH Manager
Rockwell Collins, Inc.
1100 W. Hibiscus Blvd.
Melbourne, FL 32902
kbkunde@rockwellcollins.com

D. Project Location:

1100 W. Hibiscus Blvd.
Melbourne, FL 32902

E. Project Summary:

This construction permit proposes to construct 10 Manual Spray Systems for the application of Humiseal 1B31 (mixed with 521 Thinner at a 1:1 ratio by volume) to printed circuit boards. The Manual Spray System includes a FCS300-R-H Manual Spray System, a workstation and local capture-hood, and a FX800 Fume Filtration System. The fume filtration system discharges filtered exhaust to the inside of the building. Construction also includes 5 additional satellite hand-brush workstations. All aspects of this project are under the existing Emission Unit EU-001. There is no increase in the maximum facility-wide Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) emissions limits.

F. Application Information:

Application Received on: 11/26/2014
Application Fee Received on: 12/09/2014
Additional Information Received on: 12/24/2014
Application determined to be deemed complete on: 12/24/2014

II. PSD Applicability for Project

Not applicable – the facility is not a PSD source. Therefore, the project is not subject to PSD preconstruction review.

III. Rule Applicability

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

Subject to:	Y/N	Comments
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	The Potential to Emit for VOCs is 12.3 tons per year, which is less than 250 tons per year.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	The facility is a potential source of unconfined particulate matter emissions. The facility-wide emission limit, which applies to all stationary sources at the entire facility, will be limited to less than 20 percent opacity.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	The facility is a source of VOCs. Potential to emit for VOCs is 12.310 tons per year, based on unlimited operation (8,760 hours/year).
Rule 62-296.400, F.A.C. – Stationary Source Emission Standards	N	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Brevard County is an attainment area for ozone
Rule 62-204.800(8), F.A.C. - Standards of Performance for New Stationary Sources (NSPS – 40 CFR 60)	N	No applicable categories
Rule 62-204.800(11), F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	No applicable categories
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	The Potential to Emit (in tons per year) is less than 10.2 for total HAPs and 6.8 for individual HAPs. The facility is considered a synthetic minor source of air pollution.
Rule 62-297.310, F.A.C. – General Compliance Test Requirements	N	

IV. Summary of Emissions

The existing PTE and modified PTE are as follows as provided in the Response to the 1st RAI, dated 12/23/2014:

PTE	VOC (TPY)	HAP total (TPY)	Worst Case Individual HAP (as TPY Toluene)
Current Limits	50	25	10
A. Current PTE (as represented by the post coating operations only)	7.3	5.8	4.9
B. PTE of the 10 manual spray systems being added	4.5	4.0	1.5
C. PTE of the 5 satellite hand-brush workstations being added	0.5	0.4	0.4
Revised PTE = A + B + C	12.3	10.2	6.8

V. Discussion

Rockwell Collins is an existing electronics processing facility with a current synthetic non-title V air operation permit. Administrative measures are used to track and ensure the total VOC, total HAP, and individual HAP limits are not exceeded.

Based upon the recalculated PTE for the post coating operations (which represents 90-98% of the VOC and HAP emissions), no change to the existing emissions limits or permit type (major vs minor) is deemed necessary for the emissions that this construction project adds.

VI. Federal NSPS and/or NESHAP Provisions

The facility is not subject to NSPS or NESHAP Provisions.

VII. Conclusions

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

VIII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and adopted federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, Waste & Air Resource Programs, Central District Office, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767, by e-mail at kim.rush@dep.state.fl.us or by phone at 407-897-4100.

IX. Attachments (None)