Florida Department of

Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: R. J. "Rick" Prusa
DATE: September 23, 2011
SUBJECT: Evaluation Summary for L3 Communications Integrated Systems L.P.; 0910084-007-AO, Okaloosa County

We recommend issuing a permit to L3 Communications Integrated Systems L.P., to operate their L3 Communications Integrated Systems L.P. facility. This permit follows 0910084-005-AO, issued September 1, 2006, and incorporates 0910084-006-AC, issued February 1, 2010.

Process Description

This facility performs work involved in the fabrication and finish treatment of metal parts as well as other work related to aircraft modification and repair. Activities include forming and machining of metal parts used in the aerospace industry; surface treatment (degreasing, acid/alkaline wash, anodizing and heat treating) of metal parts, grit blasting operations, and the application of primer and topcoat finishes to metal parts. Surface coating work is performed in Paint Booth #3 and includes a natural gas fueled drying booth, located in Building 16, and Hangar #4, which consists of a large warehouse sized paint booth for aircraft paint removal (chemical stripping) and aircraft surface coating.

Pollution Control Equipment

Particulate matter arrestor filters serve the surface coating operations in Hangar #4 and Paint Booth #3. Acid mist suppressants or equivalent methods control HAP emissions from the Boric Sulfuric Anodizing Tank.

Environmental Impact

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
VOC*					49.9
HAP*					9.9
Total HAP*					24.9
Objectionable Odors	62-296.320(2)			None allowed off plant property	
VE^2				Not more than 20% opacity	

* limited by applicant request to remain a synthetic minor.

Applicable Rules & Regulations

Facility-wide emission limits were established by construction permit 0910084-002-AC for HAP and VOC at the request of the applicant in order to remain a synthetic minor source of emissions.
Metal surface treating finishing operations are subject to 40 CFR 63 Subpart WWWWWW. Surface coating operations are subject to 40 CFR 63 Subpart HHHHHH.
Permittee requested adding the requirements of 40 CFR 63 Subparts HHHHHH – Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources and WWWWWW – Plating and Polishing

Operations, in 0910084-006-AC. These have not been adopted and incorporated by reference in Rule 62-204.800(11), F.A.C., as of the effective date of this permit by the Department

Compliance Monitoring
Record keeping is used to verify compliance of facility-wide annual caps for VOC and HAP.

Compliance History
The facility is in-compliance during the past five years based on a review of electronic and hardcopy compliance files, and the LCT database.

Fee Summary
This is an AO2C ($750 fee) - minor source with no sample.

RJP/c