Florida Department of

Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Debbie Moore
DATE: September 29, 2011
SUBJECT: Evaluation Summary for DRS Training & Control Systems, LLC; Beal Parkway Fabrication/Assembly Facility; 0910100-002-AF; Okaloosa County

We recommend issuing an initial FESOP permit to DRS Training & Control Systems, LLC to operate their existing Beal Parkway Fabrication/Assembly Facility. The facility has an after-the-fact construction permit 0910100-001-AC, effective June 22, 2010.

Process Description. DRS Training & Control Systems, LLC is an existing facility engaged in the fabrication, coating and assembly/integration of a variety of specialty metal components and electronic equipment housings that are used in a variety of military/defense platform applications. Operation and support activities conducted at the facility include: material receiving and storage, mechanical manufacturing (CNC machining); Chem Film conversion (non-electroplating); metals passivation; metal working; welding, brazing and soldering; circuit board assembly; electronics assembly; surface coating (spray painting); parts making/silk screening; wood shop activities; and, shipping/receiving operations.

Pollution Control Equipment. None.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
VOC	N/A	N/A	N/A	N/A	90
HAP (total)	N/A	N/A	N/A	N/A	22
HAP (individual)	N/A	N/A	N/A	N/A	9
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	62-296.320(4)	N/A	N/A	Not more than 20% opacity	

Applicable Rules & Regulations. This source is regulated in accordance with F.A.C. Rule 62-296.320(2), F.A.C., objectionable odors are not allowed off plant property; and, General Visible Emissions Rule 62-296.320(4)(b)1, F.A.C., visible emissions not more than 20% opacity. The facility is also classified as an area source and is subject to 40 CFR 63 NESHAPS subparts HHHHHH; XXXXXX and WWWWWW. Florida has not adopted these Federal standards as of September, 2011.

Compliance Monitoring. Monitoring includes recordkeeping and reporting requirements.

Compliance History. Facility was operating without an air permit. A warning letter (NWAP 09-1836) was issued but it was determined that the facility was previously exempt (using less than six gallons per

day). The facility submitted an application for an air construction permit (October 9, 2009). The case was closed without further enforcement action.

Fee Summary. This is an AF/2B ($1,000.00 fee) for a minor source with other sample and an AF/2C ($750.00 fee) for minor source with no sample. The original construction permit fee was $4,500.00 (AC/1C) for a source of emissions more than 50 but less than 100 tons per year.

DM/c