TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Lockheed Martin Aeronautics Company
9300 28th Street North

Pinellas Park Facility

Facility ID No. 1030400

PROJECT

Project No. 1030400-013-AC
Application for Minor Air Construction Permit
Project Name: Facility Expansion

COUNTY

Pinellas, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

October 10, 2011

Prepared by Brandy Flavors

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:

Steve Cobb, General Manager
Lockheed Martin Aeronautics Company
9300 28th Street North
Pinellas Park, FL33782

B. Professional Engineer:

Mitchell J. Hait, Ph.D., P.E.
Mitchell J. Hait, Ph.D., P.E., Inc.

404 Sebastian Square
St. Augustine, FL 32095

C. Project Location:

9300 28th Street North
Pinellas Park, FL 33782

D. Project Summary:

This project involves the physical expansion of the current manufacturing facility by utilizing a portion of an adjacent building located in the same industrial park. The new portion of the facility will include a paint booth and manufacturing operations, which will be considered part of the existing emissions unit EU 001, Aerospace Parts and Components Manufacturing, as further described in the permit.

E. Application Information:

Application Received on: 10/04/2011
Application Complete: 10/14/2011

II. Rule Applicability

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

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.	Y	Not exempt from general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	The facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Surface coating could be a source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Painting operations are a source of VOC and odors.
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	EU 001 operates under the requirements of the Department's

Subject to:	Y/N	Comments
		Variance (OGC File No. 10-3711) in lieu of the VOC RACT requirements.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	Y	EU No. 001 is subject to 40 CFR 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants and Miscellaneous Surface Coating at Area Sources and 40 CFR 63, Subpart WWWWWW – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	The facility is a synthetic non-Title V source.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	Testing not required for the facility.

III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions Tons per Year	Allowable Emissions Tons per Year
VOC	Facility Wide (EU 001 Surface Coating of Aerospace Parts and Components & EU 002 Surface Coating of Non-Aerospace Parts and Components)	23.0	23.0
Total HAP	Facility Wide (EU 001 Surface Coating of Aerospace Parts and	23.0	23.0

Pollutant	EU No. and brief description	Potential Emissions Tons per Year	Allowable Emissions Tons per Year
	Components & EU 002 Surface Coating of Non-Aerospace Parts and Components)		
Individual HAP	Facility Wide (EU 001 Surface Coating of Aerospace Parts and Components & EU 002 Surface Coating of Non-Aerospace Parts and Components)	9.0	9.0

IV. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

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

V. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and 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 Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).