Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

DRAFT PERMIT

PERMITTEE

Lockheed Martin Aeronautics Company
9300 28th Street North
Pinellas Park, FL 33782

Authorized Representative:
Mr. Steve Cobb, General Manager

Air Permit No. 1030400-013-AC
Permit Expires: 12/31/2012
Site Name : Pinellas Park Facility
Minor Air Construction Permit
Project Name: Facility Expansion

This is the final air construction permit, which authorizes the modification of the existing facility by expanding the facility to a neighboring building and constructing an additional paint booth. The proposed work will be conducted at the Pinellas Park Facility (Standard Industrial Classification No. 2869). The existing facility is located in Pinellas County at 9300 28th Street North in Pinellas Park, Florida. The adjacent building (expansion) is located at 2801 Gateway Centre Parkway in Pinellas Park, Florida. The UTM coordinates are Zone 17, 335.3 km East, and 3082.6 km North.

As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental

Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida
DRAFT

_____ _____

Cindy Zhang-Torres, P.E. Effective Date
Air Permitting Manager
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Mr. Steve Cobb
Lockheed Martin Aeronautics Company
steve.cobb@lmco.com

Mr. Wayne Davis
Lockheed Martin Aeronautics Company
wayne.c.davis@lmco.com

Mr. Mitchell Hait
Mitchell J. Hait, Ph.D., P.E., Inc.
haitinc@gmail.com

Mr. Gary Robbins
Pinellas County Air Quality Division
grobbins@co.pinellas.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

DRAFT

_____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Lockheed Martin Aeronautics Company – Pinellas Park Facility

This facility manufactures aerospace parts and components, as well as non-aerospace parts and components (such as metal signs, metal frames, and other miscellaneous parts and products).

The existing facility consists of the following emissions units.

Facility ID No. 1030400	
ID No.	Emission Unit Description
001	Surface Coating of Aerospace Parts and Components
002	Surface Coating of Non-Aerospace Parts and Components

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Project Description and Affected Emission Unit

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, Surface Coating of Aerospace Parts and Components. The adjacent building (expansion) is located at 2801 Gateway Centre Parkway, Pinellas Park, Florida 33782 and shares a parking lot with the current facility. This project will modify the following emissions units.

Facility ID No. 1030400	
ID No.	Emission Unit Description
001	Surface Coating of Aerospace Parts and Components

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Units/Activities

- Liquid storage tanks/vessels, including but not limited to oil reservoirs, caustic/acid baths, one 3,000 gallon ethylene glycol tank, and one 6,000 gallon dilute ethylene glycol tank.
  [Rule 62-210.300(3)(b), F.A.C.]
- Fire and safety equipment, including fire extinguishers.
  [Rule 62-210.300(3)(a), F.A.C.]
- Plant maintenance and upkeep activities (e.g., grounds keeping, general repairs, cleaning, and welding).
  [Rules 62-210.300(3)(a) and (b), F.A.C.]
- Application of fungicide, herbicide, or pesticide.
  [Rule 62-210.300(3)(a), F.A.C.]
- Laboratory equipment used exclusively for chemical or physical purposes.
  [Rule 62-210.300(3)(a), F.A.C.]
- Petroleum lubrication systems.
  [Rule 62-210.300(3)(a), F.A.C.]

- Cold storage refrigeration equipment.
  [Rule 62-210.300(3)(a), F.A.C.]

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

{*Permitting Notes: As identified in the permit application dated February 7, 2011, the facility is subject to 40 CFR 63 Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources and 40 CFR 63 Subpart WWWWWW – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations. Subpart HHHHHH is applicable to facility's surface coating operations (Emissions Unit Nos. 001 and 002), while Subpart WWWWWW is applicable to the chromate conversion process tank that is part of the chemical film process line. As of the effective date of this permit, these two Subparts have not been adopted by Florida Department of Environmental Protection and therefore are not integrated into this permit.*

Surface Coating of Aerospace Parts and Components (Emission Unit No. 001) is limited to the requirements in the Department's variance OGC File No. 10-3711 issued by the Department on March 4, 2011, with an expiration date of March 4, 2013. This variance replaces previously issued variances (OGC File No. 04-1938, OGC File No. 06-2014, and OGC File No. 08-2082). The permittee requested the variance to allow the facility to operate in accordance with the U.S. EPA Guideline Series EPA-453/R-97-004 (CTG) titled, "Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations" dated December 1997, in place of the VOC RACT requirements for Surface Coating of Miscellaneous Metal Parts and Products in Rule 62-296.513, F.A.C. The CTG also (as referenced by citation) includes only the VOC requirements contained in 40 CFR 63, Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities.}

PERMIT HISTORY/AFFECTED PERMITS

Modifies Permit No.1030400-006-AC. This permit includes specific conditions for EU 001 and common conditions for EU 001 and EU 002. Additional specific conditions for EU 002 can be found in FESOP No. 1030400-012-AF

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Air Quality Division (PCAQD). The mailing address and phone number of the Local Air Program is:

   Pinellas County Air Quality Division
   300 South Garden Avenue
   Clearwater, Florida 33756
   Telephone: 727-464-4422

3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.
   e. Appendix E. Attachment CTG (*Note: the Aerospace Control Technology Guidelines document requires compliance with the VOC requirements of 40 CFR 63, Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities*); and
   f. Appendix F. Attachment MACT VOC.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control

device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility. [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Objectionable Odor Prohibited: No person shall cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "Objectionable Odor" is defined as any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-210.200 and 62-296.320(2), F.A.C.; Pinellas County Code, Section 58-178]

8. Volatile Organic Compounds (VOC) and Organic Solvents (OS) Emissions: In addition to Condition 6. of Appendix C., for the operations not addressed by the CTG and/or MACT VOC requirements, the permittee shall comply with the following:
   a. all materials containing volatile organic compounds/organic solvents (VOC/OS) shall be stored in closed containers, or in small automatic closing safety cans, or in devices that provide an equivalent level of emission control;
   b. clean-up solvent washings (VOC/OS) shall be directed into containers that prevent evaporation into the atmosphere;
   c. all equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive VOC/OS emissions and spills of materials containing VOC/OS;
   d. work practice controls, when practicable, shall include limiting the amount of clean-up VOC/OS issued to employees;
   e. maintain tightly fitting covers, lids, etc. on all containers of VOC/OS when they are not being handled, tapped, or in active use;
   f. prevent excessive air turbulence across exposed VOC/OS;
   g. where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc. of VOC/OS so that it can be covered when not in use;
   h. all VOC/OS spills shall be attended to immediately and the waste properly disposed of, recycled, etc;
   i. the associated forced air vents (i.e., building ventilation systems) shall be operated as necessary to provide adequate collection and dispersion of VOC/OS vapors.

   [Construction Permit 1030400-006-AC]

9. Unconfined Particulate Emissions: In addition to Condition 9. of Appendix C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements:
   a. curtailing and/or ceasing outdoor surface coating activities during unfavorable wind conditions if unconfined emissions can be visually observed at or near the property line;
   b. when operating, the 3 paint spray booths shall each utilize filters in accordance with the paint spray booths manufacturer's specifications or the facility's operational and maintenance procedures.

[Construction Permit 1030400-006-AC]

10. Fugitive Emissions Opacity Requirement: As an indicator that the precautions to control unconfined particulate matter emissions, as required by Condition 9. of Appendix C. and Specific Condition 9., are adequate, emissions of unconfined particulate matter from the facility (including the three paint spray booths) should not exceed 5%. If this value is exceeded, it shall not be a violation in and of itself, but an indication that additional control precautions and/or work practices may be necessary.
[Rule 62-4.070(3), F.A.C.]

11. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

12. Application for Non-Title V Air Operation Permit: This permit authorizes modification of the permitted emissions unit EU001 and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:
    a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;
    b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and
    c. copies of the most recent month of records/logs specified in Specific Condition No(s). A.3., A.4., B.6. and B.7.

[Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

A. Common Conditions for EU 001 – Surface Coating of Aerospace Parts and Components and EU 002 – Surface Coating of Non-Aerospace Parts and Components

This section of the permit addresses the common conditions for Emissions Unit Nos. 001 and 002.

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation: The hours of operation are not limited (8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.2. Emission Limitations: Emissions from Emissions Unit Nos. 001 and 002 and currently the entire facility, shall not be equal to or exceed the following per any consecutive 12-month period:

Pollutant	Tons
VOC	23.0
Any Individual HAP	9.0
Total HAP	23.0

Based on these emission limitations:

– Additional emissions units/activities at the facility may not be eligible to utilize the Categorical Exemptions in Rule 62-210.300(3)(a), F.A.C. or the Generic and Temporary Exemptions in Rule 62-210.300(3)(b), F.A.C.

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

{*Permitting Note: The limits were requested by the permittee in the permit application dated 10/4/2011*}

RECORDS AND REPORTS

A.3. VOC Monthly Recordkeeping Requirements: In order to demonstrate compliance with the emission limitations of Specific Condition No. A.2., the permittee shall monthly record the following:

a. facility name, facility ID No. (1030400), Emissions Unit ID Nos. (001 & 002);

b. month/year;

c. a cumulative combined (Emissions Unit Nos. 001 and 002) total of the VOC emissions for the most recent consecutive 12-month period (tons per consecutive 12-month period).

[Rule 62-4.070(3), F.A.C.]

A.4. HAP Monthly Recordkeeping Requirements: In order to demonstrate compliance with the emission limitations of Specific Condition No. A.2., the permittee shall monthly record the following:

a. facility name, facility ID No. (1030400), Emissions Unit ID Nos. (001 & 002);

b. month/year;

A. Common Conditions for EU 001 – Surface Coating of Aerospace Parts and Components and EU 002 – Surface Coating of Non-Aerospace Parts and Components

c. a cumulative combined (Emissions Unit Nos. 001 and 002) total of the HAP emissions for each individual HAP for the most recent consecutive 12-month period (tons per consecutive 12-month period);

d. a cumulative combined (Emissions Unit Nos. 001 and 002) total of the HAP emissions for total HAP for the most recent consecutive 12-month period (tons per consecutive 12-month period).

[Rule 62-4.070(3), F.A.C.]

A.5. Documentation: Supporting documentation (e.g., MSDS sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) which includes sufficient information to determine VOC and HAP emissions shall also be kept. These records may be maintained in either a hardcopy or electronic format.
[Rule 62-4.070(3), F.A.C.]

A.6. Records Retention: The records required by this permit shall be recorded in a permanent form suitable for inspection by PCAQD and the Department upon request, and shall be retained at the facility for a minimum of the most recent three (3) year period. Monthly records shall be completed by the end of the following month. These records may be maintained in either a hardcopy or electronic format.
[Rules 62-4.070(3) and 62-4.160, F.A.C.]

B. EU 001 Surface Coating of Aerospace Parts and Components

This section of the permit addresses the following emissions unit.

ID No.	Emissions Unit Description
001	For surface coatings of aerospace parts and components. Typical operations associated with Emissions Unit No. 001 may consist of materials receiving, machining and mechanical processing, coating application, heat treating, cleaning, metal processing and finishing, coating removal (depainting), composite processing, and testing. Both Emissions Unit Nos. 001 and 002 may utilize the same two existing paint spray booths (Paint Booth Nos. 1 and 2) and fabrication area(s) at the facility. Paint Booth No. 1 (north) is manufactured by Blowtherm and is 30' x 14' x 12' with a 42 foot high stack. Paint Booth No. 2 (south) is manufactured by Global Finishing Solutions and is 30' x 18' x 9' with a 46 foot high stack. The new Paint Booth No. 3 (in building adjacent to the main building) is manufactured by Lee Patterson Co. and is 30' x 18' x 9' with a 38 foot high stack. This emissions unit is limited to the requirements in the Department's variance OGC File No. 10-3711 issued by the Department on March 4, 2011, with an expiration date of March 4, 2013.

PERFORMANCE RESTRICTIONS

B.1. Operating Limitations: This emissions unit is limited to the manufacturing of aerospace components and parts.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit 1030400-006-AC]

B.2. Variance Extension Request: If necessary, the permittee may request an extension of the Department's variance dated March 4, 2011, (OGC File No. 10-3711) to the Department's Division of Air Resource Management in Tallahassee at least 180 days prior to March 4, 2013.
[Rule 62-4.070(3), F.A.C.]

B.3. Authorization to Operate: The activities addressed in this permit are authorized to operate as follows:

a. Emissions Unit No. 001 may operate up to the expiration date of the Department's variance OGC File No. 10-3711, which is March 4, 2013, or up to any extended date issued by the Department. The Department's variance OGC File No. 10-3711 was issued on March 4, 2011;

and

b. up to the expiration date of this permit. Note, Emissions Unit No. 001 can only operate up to the expiration date of this permit if the criteria of Specific Condition No. B.3.a. is satisfied.

[Rule 62-4.070(3), F.A.C.]

EMISSIONS STANDARDS

B.4. Other Emission and Related Applicable Requirements: The permittee shall also comply with the requirements contained in the following documents. In addition, exemptions provided in these documents shall also apply to the permittee's operations.

a. Attachment CTG (Note, the Aerospace CTG document requires compliance with the VOC requirements of 40 CFR 63, Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities);

b. Attachment MACT VOC.

[Rule 62-4.070(3), F.A.C.; FDEP Variance OGC File No. 10-3711; Construction Permit 1030400-006-AC]

NOTIFICATION REQUIREMENTS

B.5. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the new paint booth, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

{Permitting Note: Even though Attachment CTG and Attachment MACT VOC contain exemptions from various requirements, usage of all VOC and/or HAP containing materials shall be recorded as part of Specific Condition Nos. B.6. and B.7.}

B.6. VOC Monthly Recordkeeping Requirements: In order to demonstrate compliance with the emission limitations of Specific Condition No. A.2., the permittee shall monthly record the following:

a. facility name, facility ID No. (1030400), Emissions Unit ID No. (001), Surface Coating of Aerospace Parts and Components;

b. month/year;

c. the total quantity (gallons) and VOC content (lbs./gallon) of each VOC containing material used for the month;

d. the calculated monthly total VOC emissions, in pounds or tons per month (based upon material VOC content);

e. a cumulative total of the VOC emissions for the most recent consecutive 12-month period (tons per consecutive 12-month period).

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030400-006-AC]

B.7. HAP Monthly Recordkeeping Requirements: In order to demonstrate compliance with the emission limitations of Specific Condition No. A.2., the permittee shall monthly record the following:

a. facility name, facility ID No. (1030400), Emissions Unit ID No. (001), Surface Coating of Aerospace Parts and Components;

b. month/year;

c. the total quantity (gallons) and HAP content (lbs./gallon) of each HAP containing material used for the month;

d. the calculated monthly HAP emissions for each individual HAP, in pounds or tons per month (based upon material HAP content);

e. the calculated monthly HAP emissions for total HAP, in pounds or tons per month;

f. a cumulative total of the HAP emissions for each individual HAP for the most recent consecutive 12-month period (tons per consecutive 12-month period);

g. a cumulative total of HAP emissions for total HAP for the most recent consecutive 12-month period (tons per consecutive 12-month period).

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030400-006-AC]