

FULL COMPLIANCE EVALUATION CHECKLIST

AIRS ID 0990021	OWNER United Technologies Corp.	FACILITY NAME United Technologies Corp.
<input checked="" type="checkbox"/> TITLE V	<input type="checkbox"/> SYNTHETIC MINOR	DATE OF THIS FCE 08/22/2013 & 9/12/2013
<input type="checkbox"/> TITLE V MEGA-SITE*	<input type="checkbox"/> OTHER	DATE OF LAST FCE 08/09/2011

*Facility with a large number of complex emissions units. It is more reasonable to evaluate a Title V Mega-Site once every 3 years instead of once every 2 years.

REVIEW OF ALL REQUIRED REPORTS

PERIODIC REPORTS	COMMENTS
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A Annual operating report	<i>Submitted on 03/26/2013</i>
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A Statement of compliance	<i>Submitted on 02/27/2013</i>
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Annual	
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A Semi-annual	<i>Semi-Annual Report – submitted on 2/1/13 for S2-2012</i>
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Quarterly	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Other :	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Other :	

CONTINUOUS EMISSION MONITOR REPORTS	COMMENTS
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Quarterly excess emissions	
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A Semi-annual	<i>Title V semi-annual monitoring report – submitted on 2/1/13 for S2-2012</i>
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A RATA	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A CGA	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Other :	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Other :	

ASSESSMENT OF CONTROL DEVICE AND PROCESS OPERATING CONDITIONS

<input type="checkbox"/> OFF-SITE ASSESSMENT	(Describe the off-site assessment in comments)			
<input checked="" type="checkbox"/> ON-SITE ASSESSMENT	(Document the on-site inspection below)			
DATE OF INSPECTION	DATE OF INSPECTION REPORT	My office maintains the inspection report...		
		...in the ARMS database through EASIIR.	...with the paper or electronic compliance files	...in another location (specify).
08/02/2012	08/07/2012	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS: <i>INS2 was conducted on 8/2/2012 since the last Full Compliance Evaluation.</i>				

FULL COMPLIANCE EVALUATION CHECKLIST

REVIEW OF TESTS AND RECORDS

TESTS, OBSERVATIONS AND RECORDS		COMMENTS
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Visible emission observation(s)	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Review of facility records and logs	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Assessment of process parameters (feed rates, process rates, raw material compositions, etc.)	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Assessment of control equipment performance parameters (water flow rates, pressure drops, temperatures, ESP power levels, etc.)	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Stack test(s)	

COMPLIANCE MONITORING (CM) INFORMATION

CM ELEMENT	My office maintains this information...			
	...electronically, in the ARMS database.	...in the permit.	...in the inspection report.	...in another location (specify).
Facility information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Applicable requirements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inventory of emission units	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Enforcement history	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Findings and recommendations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
COMMENTS				

OTHER COMMENTS

This full compliance evaluation was conducted in two phases. In the first FCE on 8/22/2013, the department reviewed some of the recordkeeping maintained by the facility. During the first FCE, it was noted a second inspection is needed to ensure all the recordkeeping data and emissions units are inspected. Prior to the second FCE on 9/12/2013, the facility emailed the spreadsheet containing the records of HAPS and other emissions from individual EUs. During the second FCE, the department reviewed the remaining recordkeeping and met with the facility representatives to discuss future projects the facility is planning to develop. Other emissions units were also inspected during the FCE. The facility was requested to submit some of the records maintained by the facility on site for EUs 081 and 082. On 09/13/2013, the facility representative emailed the requested documents.

The facility has been requested to maintain the recordkeeping in the same order as required by the permit, including the names of emissions units.

Prepared by: Binod Basnet *BBasnet*

Date: 9/17/2013

Reviewed by: Laxmana Tallam

Date: 9/17/13

Inspection Date	08/22/2013, 09/12/2013
Arrival/Departure	9:30 am - 1:00 pm (both days)
Facility Contact	Dean Gee
Phone Number	561-796-2108

Inspection Comments:

I (Binod Basnet) and Laxmana Tallam conducted the biennial full compliance evaluation (FCE) site inspection at United Technologies Corp (ARMS ID - 0990021) on August 22, 2013 and September 12, 2013. Mr. Dean Gee, the facility contact person, was present on site during the time of inspection. During the first site inspection conducted on 08/22/2013, the recordkeeping maintained by the facility on site as required by the Title V permit was reviewed. At the inspection, it was noted that another site inspection was needed to review additional recordkeeping maintained by the facility on site. Facility was requested to email the recordkeeping spreadsheet to the department prior to the second inspection day. The facility emailed the spreadsheet, which was reviewed prior to the second inspection day. Review comments for each emissions units are provided below under individual emissions unit remarks box. The recordkeeping documents provided by the facility during and after the inspection are attached with this inspection report.

EU No.	R / U*	Brief Description	OK	Not OK	N/A	Remarks
<i>Following emission units are located at Pratt & Whitney Rocketdyne (except as noted)</i>						
9	U	Diesel storage tanks	√			Unregulated emissions unit, records were reviewed.
10	U	Jet fuel storage tanks	√			Unregulated emissions unit, records were reviewed.
12	U	Jet fuel storage tank (F-8-CFF)	√			Unregulated emissions unit, records were reviewed.
14	R	Paint spray booth (PS-1-TMC) used for refinishing support equipment	√			Monthly emissions records for the paint booth was reviewed
15	U	Closed-loop flush cleaning (BF-1-RL-10) using Vertrel MCA	√			Unregulated emissions unit, records were reviewed. This emissions unit is being removed from this permit per applicants' request. The facility plans to sell the EU to Aerojet Rocketdyne, Inc. A new construction permit is being reviewed by the department for this EU.
16	R	Boiler (BO-12-E6) fired by natural gas – 42 MMBTU/hr Heat Input	√			Monthly emissions records for the boiler was reviewed. This emissions unit is being removed from this permit per applicants' request. The facility plans to sell the EU to Aerojet Rocketdyne, Inc. A new construction permit application submitted by Aerojet is being reviewed by the department for this EU.
18	U	Acid gas scrubbing system (AS-2-MPL) for plating operations	√			Unregulated emissions unit, records were reviewed. This emissions unit is being removed from this permit per applicants' request. The facility plans to sell the EU to Aerojet Rocketdyne, Inc. A new construction permit application submitted by Aerojet is being reviewed by the department for this EU.
22	R	Boilers (BO-1-MBH, BO-2-MBH) fired by natural gas – 54 MMBTU/hr Heat Input per Boiler			√	This emissions unit is demolished and removed from the site. The proposed Title V renewal permit 0990021-036-AV addresses the removal of this EU and changes it to Inactive.
31	U	Diesel storage tanks (DL-19-SEGF and DL-20-SEGF)	√			Unregulated emissions unit, records were reviewed.
37	U	AST Gasoline storage tanks	√			Unregulated emissions unit, records were reviewed.
40	U	Heat treatment furnaces (FU-3-MHT and FU-4-MHT) fired by natural gas	√			Unregulated emissions unit, records were reviewed. This emissions unit is being removed from this permit per applicants' request. The facility plans to sell the EU to Aerojet Rocketdyne, Inc. A new construction permit is being reviewed by the department for this EU.
45	U	Water evaporator (EV-1-MW)	√			Unregulated emissions unit, records were reviewed.
49	U	Plasma spray booths	√			Unregulated emissions unit, records were reviewed.
59	U	Air and fuel heaters fired with natural gas	√			Unregulated emissions unit, records were reviewed.
64	R	Paint spray booth (PSB-1-RTF)	√			Monthly emissions records for the paint booth was reviewed
65	U	Diesel engines powering fire protection pumps and cooling water pumps during rocket engine testing and emergency electrical generators	√			Unregulated emissions unit, records were reviewed. Monthly emissions records for the boiler was reviewed. This emissions unit is being removed from this permit per applicants' request. The facility plans to sell the EU to Aerojet Rocketdyne, Inc. A new construction permit application submitted by Aerojet is being reviewed by the department for this EU.
66	R	Boiler (BO-14-E8) fired by propane subject – 6.7 MMBTU/Hr Heat Input	√			Monthly emissions records for this all the diesel engines were reviewed. The facility has been issued a construction permit to install DOC on each diesel engine. This EU will be inactivated by the construction permit and new EUs (092 - 105) will be created.
68	R	Emergency electrical generating facility	√			Unregulated emissions unit, records were reviewed. An engine test was being conducted at A-09 during the time of inspection.
69	U	JP-8 Fueled Jet engine test stands – Test Area A/C	√			Unregulated emissions unit, records were reviewed.
70	U	Aerospace hand-wiping operations	√			Unregulated emissions unit, records were reviewed.
71	U	Aerospace spray gun cleaning operations	√			Unregulated emissions unit, records were reviewed.
72	U	Aerospace flush cleaning operations	√			Unregulated emissions unit, records were reviewed.
73	U	Aerospace primer and topcoat application operations	√			Unregulated emissions unit, records were reviewed.
74	U	Aerospace waste storage and handling operations	√			Unregulated emissions unit, records were reviewed.
77	R	Combustion turbine test stands – Fired by Natural Gas	√			Monthly emissions records for the EU was reviewed.
78	R	Vertrel Vapor Degreaser			√	This emissions unit is demolished and removed from the site. The proposed Title V renewal permit 0990021-036-AV addresses the removal of this EU and changes it to Inactive.

79	R	Two JP8 fired Turbine Engines powering air compressors used for jet engine tests (also known as RAM Test Facility)	√		Monthly emissions records for the EU was reviewed.
80	R	E-8 Rocket Engine Test Stand – Methane Fuel Operations	√		Monthly emissions records for this EU was reviewed. This emissions unit is being removed from this permit per applicants' request. The facility plans to sell the EU to Aerojet Rocketdyne, Inc. A new construction permit application submitted by Aerojet is being reviewed by the department for this EU.
88	R	Jet Engines Parts Coating Process	√		Monthly emissions records for the EU was reviewed.
Following emission units are located at Sikorsky Aircraft Corporation					
81	R	SIK - Spray Booth (PS-14-SIK) for aerospace coating operations [Previously EU 006 in Sikorsky permit]	√		Monthly emissions records for the paint booth was reviewed.
82	R	SIK - Spray Booth (PS-16-SIK) for aerospace coating operations [Previously EU 008 in Sikorsky permit]	√		Monthly emissions records for the paint booth was reviewed.
83	R	SIK - Boiler (BO-4-SIK) fired by natural gas-- 2.93 MMBTU/Hr Heat Input [Previously EU 009 in Sikorsky permit]	√		Monthly emissions records for the boiler was reviewed.
84	U	SIK - Alodine tank – about 10 gallon capacity The tank at the facility is a 10-gallon tank, is covered and is mounted on a bench, and hence it is not subject to 40 CFR 63 Subpart WWWW pursuant to the amendments issued by the EPA on September 19, 2011. The status of this EU is changed from 'regulated' to 'unregulated.'	√		Unregulated emissions unit, emissions records were reviewed.
Following emission unit is used to track VOC emissions from miscellaneous activities at P&W and Sikorsky					
85	U	Miscellaneous VOC/HAP Emissions Sources	√		Unregulated emissions unit, emissions records were reviewed.
Following emission units are located at the FIT Center					
86	R	Fire Innovation and Test Center	√		The emissions unit is not in operation at this time. The facility representative informed that the emissions unit will not be in operation from now on. Monthly emissions records for the EU was reviewed.
87	R	810 KW Diesel Generator – [see Appendix ICE]	√		Monthly emissions records for the EU was reviewed.

Currently there are several air construction permit issued to the facility. Following are the emissions units and the respective air construction permit number:

EU	Status	Permit No.	EU Description	OK	Not OK	N/A	Remarks
89	C	0990021-031-AC	Hot Acoustic Rig (HAR) at B-6 Test Stand			√	This EU has not been constructed on site.
90	C	0990021-032-AC	FT4000 Gas Turbine Testing at Test Stand A4			√	This EU has not been constructed on site.
91	C		FT4000 Compressor RICE			√	This EU has not been constructed on site.
92	C	0990021-033-AC	2100 hp Detroit Diesel Engine (Generator 1A), S/N 16E0009430			√	These EUs are parts of current EU-068. Facility plans to install DOC on each of the diesel engine listed.
93	C		2100 hp Detroit Diesel Engine (Generator 1B), S/N 16E0009909			√	
94	C		2100 hp Detroit Diesel Engine (Generator 2A), S/N 16E0009404			√	
95	C		2100 hp Detroit Diesel Engine (Generator 2B), S/N 16E0009908			√	
96	C		2100 hp Detroit Diesel Engine (Generator 3A), S/N 16E0009427			√	
97	C		2100 hp Dteroit Diesel Engine (Generator 3B), S/N 16E0009907			√	
98	C		2100 hp Detroit Diesel Engine (Generator 4A), S/N 16E0009403			√	
99	C		2100 hp Detroit Diesel Engine (Generator 4B), S/N 16E0009896			√	
100	C		2100 hp Detroit Diesel Engine (Generator 5A), S/N 16E0009402			√	
101	C		2100 hp Detroit Diesel Engine (Generator 5B), S/N 16E0009897			√	
102	C		2100 hp Detroit Diesel Engine (Generator 6A), S/N 16E0009401			√	
103	C		2100 hp Detroit Diesel Engine (Generator 6B), S/N 16E0009895			√	
104	C		2100 hp Detroit Diesel Engine (Generator 7A), S/N 16E0009397			√	
105	C		2100 hp Detroit Diesel Engine (Generator 7B), S/N 16E0009894			√	

Permit No. 0990021-034-AC is a permit extension of 0990021-028-AC

Permit No. 0990021-035-AC is a construction permit to remove the emissions units that are being sold to Aerojet Rocketdyne, Inc.

Permit No. 0990021-036-AV is a Title V air operation permit revision.

BINOD BASNET, *B. Basnet*
Prepared By *9/17/2013*

The following conditions apply facility-wide:

S.No.	Facility Wide Conditions	OK	Not OK	N/A
1	Emissions of Hazardous Air Pollutants (HAPs): The facility-wide emissions of a single HAP are limited to 9.9 tons in any consecutive 365-day period (rolling total). The facility-wide emissions of total HAPs are limited to 24.9 tons in any consecutive 365-day period (rolling total). The permittee shall monitor the emissions of HAPs pursuant to the condition 17 of this Section. [Applicant's request to become a synthetic minor facility for HAPs; Permit Nos. 0990021-020-AC, 0990021-027-AC, 0990021-030-AC]	√		
2	APPENDIX TV-6, TITLE V CONDITIONS, and Appendix ICE are part of this permit. {Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}	√		
3	<u>General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited.</u> No person shall cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.; and, 0990021-020-AC]	√		
4	<u>General Particulate Emission Limiting Standards. General Visible Emissions Standard.</u> Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]	√		
5	<u>Prevention of Accidental Releases (Section 112(r) of CAA).</u> a The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: <div style="text-align: center;"> RMP Reporting Center Post Office Box 1515 Lanham-Seabrook, MD 20703-1515 Telephone: 301/429-5018 </div> and, b The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C. [40 CFR 68]	√		
6	<u>General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions.</u> The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. "Nothing was deemed necessary and ordered at this time." [Rule 62-296.320(1)(a), F.A.C.; and, revision/renewal Title V permit application received August 10, 2012.	√		
7	<u>Emissions of Unconfined Particulate Matter.</u> Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-6, TITLE V CONDITIONS): The following requirements are "not federally enforceable": a Paving and maintenance of roads , parking areas, and yards; b Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing. c Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings, or work areas to prevent particulates from becoming airborne. d Landscaping or planting of vegetation e Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter	√		

f	Confining abrasive blasting where possible [Rule 62-296.320(1)(a), F.A.C.; Permit Nos: 0990021-020-AC & 0990021-027-AC]			
8	When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. [Rule 62-213.440, F.A.C.]	v		
9	<u>Statement of Compliance</u> . The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. [Rules 62-213.440(3) and 62-213.900, F.A.C.] {Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS)}	v		
10	The permittee shall submit all compliance related notifications and reports required of this permit to the Palm Beach County Health Department office. Palm Beach County Health Department Air & Waste Section 800 Clematis Street, West Palm Beach, FL 33401 Ph: 561-837-5900; Fax: 561-837-5295	v		
11	Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to: United States Environmental Protection Agency Region 4 Air, Pesticides & Toxics Management Division Air and EPCRA Enforcement Branch Air Enforcement Section 61 Forsyth Street Atlanta, Georgia 30303-8960 Telephone: 404/562-9155; Fax: 404/562-9163	v		
12	<u>Certification by Responsible Official (RO)</u> . In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]	v		
13	<u>Annual Operations Report</u> : Before April 1st of each year, the owner or operator shall submit an Annual Operations Report [DEP Form No. 62-210.900(5)] to the Palm Beach County Health Department which summarizes operations for the previous calendar year. If the report is submitted, using the Department's electronic annual operating report software (EAOR), there is no requirement to submit a copy to DEP or the Palm Beach County Health Department. [Rule 62-210.370(3), F.A.C.]	v		
14	<u>Annual Emissions Fee</u> : The permittee must pay between January 15 and March 1 of each year, upon written notice from the Department, an annual emissions fee in an amount determined as set forth in Rule 62-213.205(1), F.A.C. [Rule 62-213.205(1), F.A.C.]	v		
15	<u>Permit Renewal</u> : For purposes of permit renewal, a timely application is one that is submitted 225 days before the expiration of a permit [Rule 62-213.420(1)(a)2. F.A.C.]	v		
16	<u>Test Procedures</u> : All test methods and procedures shall be performed in accordance with the applicable requirements of Chapter 62-297, F.A.C., summarized in Appendix C of this permit. [Rule 62-297.100, F.A.C.]	v		

17	<p>Annual HAP Emissions – Recordkeeping: The permittee shall monitor compliance with the HAPs emissions limits, specified in condition 1 of this section, on a monthly basis. If the facility-wide rolling 12-month total emissions do not exceed 80% of the HAPs emission limits as specified, the permittee shall continue to monitor facility-wide HAPs emissions on a monthly basis (rolling 12-month total). If the facility-wide rolling 12-month total emissions of HAPs exceed 80% of the HAPs emissions limits as specified, the permittee shall monitor facility-wide HAPs emissions on a daily basis (rolling 365-day total). When the facility-wide rolling 365-day total emissions of HAPs do not exceed 80% of the specified HAPs emissions limits for 30 consecutive days, then monthly monitoring of HAPs emissions can be resumed.</p> <p>The permittee shall maintain and record the following information.</p> <p>a The individual and total HAP fraction for each solvent/coating material that contains or emits HAPs. If the HAP content is provided by the material supplier or manufacturer as a range, then the permittee must use the upper limit of the range for determining compliance.</p> <p>b The solvent utilization on a monthly basis for all solvents that contain or emit HAPs.</p> <p>c The individual and total monthly HAP emissions for each material, calculated from the monthly material utilization and the individual and total HAP fraction, calculated for the preceding month no later than 20 days after the end of that month.</p> <p>d For fuel burning units, the monthly emissions of individual HAP and total HAPs shall be estimated based on the monthly fuel usage; and the emissions factor provided by the manufacturer or AP-42 <i>“Compilation of Air Pollutant Emission Factors.”</i></p> <p>e Using the monthly totals computed in subsection (c) and (d) above, rolling consecutive 12-month total emissions for individual and total HAPs for the entire facility shall be calculated for the previous twelve calendar months.</p> <p>[Permit Nos. 0990021-020-AC & 0990021-027-AC]</p>	v		
18	<p>40 CFR Part 63 Subpart HHHHHH: The operation of those emissions units that are subject to 40 CFR 63 Subpart HHHHHH <i>“National Emission Standard for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources”</i> shall comply with the conditions specified in Appendix HHHHHH. [40 CFR 63 Subpart HHHHHH]</p>	v		

Monthly HAPs by EU	EU-016 AR E-6 boiler	EU-022 Demolished boilers	EU-040 AR Heat Treatment ovens	EU-045 Water Evaporator	EU-059 Air and Fuel Heaters	EU-065 Emergency diesels for generators and firepumps	EU-066 AR E-8 propane boiler	EU-068 SEGF Diesel Generators	EU-069 JP8 Fueled Test Stands	EU-077 GG8 - Natural gas testing	EU-079 RAM Test JP8 engines	EU-080 AR Methane testing	EU-083 Sikorsky boiler	EU-086 FIT Burn operations	EU-087 FIT Diesel compress or	EU-088 B-6 Hot Acoustic Rig stand
Jan-12	6.008	1.269	0.751	0.001	0.482	0.245	0.000	0.534	36.183	0.000	6.03E-05	0	0	0	0.011336	0
Feb-12	6.101	1.204	0.556	0.000	0.037	0.245	0.000	1.649	24.938	0.000	0	0	0.486271	0	0.011336	0
Mar-12	7.269	1.254	0.360	0.000	0.000	0.245	0.000	0.003	23.765	0.000	5.01E-05	0	0.854406	0.100487	0.011336	0
Apr-12	5.341	1.099	0.396	0.000	0.099	0.245	0.000	0.003	65.287	0.000	6.81E-05	0	1.907622	0	0.011336	0
May-12	4.872	0.990	0.349	0.000	0.543	0.245	0.000	0.022	108.408	0.000	0.000133	0	0	0.012822	0.011336	0
Jun-12	0.000	0.000	0.404	0.000	0.279	0.245	0.000	0.090	31.855	0.000	0.002148	0	0	0	0.011336	0
Jul-12	8.143	0.000	0.456	0.000	0.028	0.245	0.000	1.003	31.956	0.000	0.012073	0	0	0.010798	0.011336	0
Aug-12	3.989	0.000	0.000	0.021	0.000	0.245	0.000	0.043	14.967	0.000	8.78E-05	0	0	0	0.011336	0
Sep-12	8.948	0.000	0.724	0.040	0.000	0.245	0.000	0.000	33.594	0.000	0	0	0	0.007767	0.011336	0
Oct-12	3.722	0.000	0.603	0.034	0.000	0.245	0.000	0.310	38.974	0.000	0.00263	0	0	0.066352	0.011336	0
Nov-12	3.700	0.000	0.320	0.025	0.000	0.245	0.000	0.155	14.987	0.000	0.005186	0	0	1.384774	0.011336	0
Dec-12	4.031	0.000	0.001	0.000	0.003	0.245	0.000	0.034	19.801	0.000	0	0	0	13.50536	0.011336	0
Jan-13	8.003	0.000	0.302	0.009	0.000	0.240	0.000	0.000	59.480	0.000	0.211885	0	0	21.57483	0.011336	0
Feb-13	9.239	0.000	0.121	0.000	0.000	0.240	0.000	0.000	12.605	0.000	0.893875	0	0	0	0.011336	0
Mar-13	8.527	0.000	0.262	0.000	0.000	0.240	0.000	0.000	19.527	0.000	8.233945	0	0	0	0.011336	0
Apr-13	4.616	0.000	0.000	0.132	0.000	0.240	0.000	0.000	8.581	0.000	0	0	0	0	0.011336	0
May-13	7.659	0.000	0.381	0.044	0.000	0.240	0.000	0.000	6.279	0.000	0.006814	0	0	0	0.011336	0
Jun-13	9.435	0.000	0.113	0.000	0.000	0.240	0.000	0.000	3.275	0.000	0	0	0	0	0.011336	0
Jul-13	0.000	0.000	0.000	0.000	0.000	0.240	0.000	0.000	6.697	0.000	0	0	0	0	0.011336	0
Aug-13	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0	0	0	0	0	0
Sep-13	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0	0	0	0	0	0
Oct-13	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0	0	0	0	0	0
Nov-13	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0	0	0	0	0	0
Dec-13	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0	0	0	0	0	0

Monthly Subtotal of Combustion Emission Units # HAPs	All Combustion Sources Rolling 12 Month HAPs data starts Jan 2012	EU-014 TMC paintbooth	EU-064 Remote Test Spray Booth	EU-070 Handwiping	EU-081 Sikorsky PS-14-SIK booth	EU-082 Sikorsky PS-16-SIK booth	Monthly Subtotal of Solvent Emission Units # HAPs	All Solvent Sources Rolling 12 Month HAPs data starts Jan 2012	All Combustion Sources Rolling 12 Month HAPs data starts Jan 2012	Grand Total All HAPs - 12 month rolling #	Tons Total HAPs	Month
45.49	45.49	117.64	0.00	0.00	2.67	4.44	124.75	124.75	45.49	170.24	0.09	Jan-12
35.23	80.71	46.91	0.08	0.03	2.90	1.97	51.89	176.64	80.71	257.35	0.13	Feb-12
33.86	114.58	81.89	0.52	0.00	1.70	4.81	88.92	265.56	114.58	380.14	0.19	Mar-12
74.39	188.96	14.09	0.29	0.06	1.22	5.63	21.29	286.85	188.96	475.81	0.24	Apr-12
115.45	304.42	50.98	0.30	0.00	2.11	8.90	62.29	349.14	304.42	653.56	0.33	May-12
32.89	337.31	36.51	0.00	0.03	1.36	1.47	39.37	388.51	337.31	725.82	0.36	Jun-12
41.87	379.17	16.73	0.00	0.00	1.04	4.88	22.65	411.16	379.17	790.33	0.40	Jul-12
19.28	398.45	30.87	1.10	0.06	3.24	4.86	40.13	451.29	398.45	849.74	0.42	Aug-12
43.57	442.02	28.01	0.00	0.00	1.37	11.05	40.43	491.72	442.02	933.74	0.47	Sep-12
43.97	485.99	40.74	0.00	0.03	0.98	3.09	44.84	536.56	485.99	1022.55	0.51	Oct-12
20.83	506.82	63.28	0.00	0.00	2.46	7.22	72.96	609.52	506.82	1116.34	0.56	Nov-12
37.63	544.46	97.96	0.00	0.06	3.16	4.42	105.60	715.12	544.46	1259.58	0.63	Dec-12
89.83	588.80	18.47	0.00	0.00	1.82	3.85	24.15	614.52	588.80	1203.32	0.60	Jan-13
23.11	576.68	22.26	0.00	0.00	7.59	1.72	31.57	594.20	576.68	1170.88	0.59	Feb-13
36.80	579.62	49.6	0.24	0.00	5.91	1.37	57.11	562.39	579.62	1142.01	0.57	Mar-13
13.58	518.81	105.57	0.21	0.03	7.64	1.46	114.91	656.01	518.81	1174.83	0.59	Apr-13
14.62	417.98	20.54	0.47	0.00	1.75	0.80	23.56	617.29	417.98	1035.27	0.52	May-13
13.07	398.17	30.11	0.00	0.06	10.56	1.07	41.80	619.71	398.17	1017.88	0.51	Jun-13
6.95	363.25	15.03	0.08	0.03	6.42	0.00	21.56	618.63	363.25	981.88	0.49	Jul-13
0.00	343.97	0	0.00	0.00	0.00	0.00	0.00	578.50	343.97	922.47	0.46	Aug-13
0.00	300.40	0	0.00	0.00	0.00	0.00	0.00	538.07	300.40	836.47	0.42	Sep-13
0.00	256.43	0	0.00	0.00	0.00	0.00	0.00	493.23	256.43	749.66	0.37	Oct-13
0.00	235.60	0	0.00	0.00	0.00	0.00	0.00	420.27	235.60	655.87	0.33	Nov-13
0.00	197.96	0	0.00	0.00	0.00	0.00	0.00	314.67	197.96	512.63	0.26	Dec-13

Basnet, Binod

From: GEE, DEAN PW [dean.gee@pw.utc.com]
Sent: Monday, September 16, 2013 2:19 PM
To: Basnet, Binod; Tallam, Laxmana
Cc: Hellerman, Corine SIK; HORCHAR, EDWARD A SIK
Subject: FW: [External] RE: FDEP request for info
Attachments: WPB PaintMan rev.docx; Daily Use Example.xlsx

Laxmana and Binod,

Please refer to attachments and Corine's explanations below.

Please contact us if you have additional questions.

Thanks,

Best regards,

Dean

From: Hellerman, Corine SIK [mailto:CHellerman@SIKORSKY.COM]
Sent: Monday, September 16, 2013 2:02 PM
To: GEE, DEAN PW
Cc: HORCHAR, EDWARD A SIK
Subject: RE: [External] RE: FDEP request for info

Having computer refresh issues

Here is the excel file, which is an excerpt of the daily entries and answers to their questions.
Both docs marked as non-ITAR.

For 06UTC-24158, 13.1 lb/gal density is for the paint mix as applied (if multiple parts) and 10.7423 lb/gal is the density of one part of the paint mix.

Total HAP content in 06UTC-24158 is 0.26 lb HAP/gal (pollutant content) or 1.985% (uncontrolled). This is $0.26 \div 13.1 \times 100 = 1.985\%$. This is for VOC HAP.

From: GEE, DEAN PW [mailto:dean.gee@pw.utc.com]
Sent: Monday, September 16, 2013 10:38 AM
To: Laxmana_Tallam@doh.state.fl.us; Binod_Basnet@doh.state.fl.us
Cc: Hellerman, Corine SIK; HORCHAR, EDWARD A SIK
Subject: RE: [External] RE: FDEP request for info

Laxmana and Binod,

I will follow up on screenshot questions with Corine and advise.

Best regards,

9/17/2013

Dean

From: [Laxmana Tallam@doh.state.fl.us](mailto:Laxmana_Tallam@doh.state.fl.us) [[mailto:Laxmana Tallam@doh.state.fl.us](mailto:Laxmana_Tallam@doh.state.fl.us)]
Sent: Monday, September 16, 2013 8:35 AM
To: GEE, DEAN PW
Cc: [Binod Basnet@doh.state.fl.us](mailto:Binod_Basnet@doh.state.fl.us)
Subject: [External] RE: FDEP request for info

Dean:

Refer to first screen shot: There are two numbers for density. 13.1 lbs/gal and 10.7423 lbs/gal. Are they TOTAL and VOC densities?

Second screen shot: What are 'pollutant content' and 'uncontrolled %?'

From: Basnet, Binod
Sent: Monday, September 16, 2013 8:21 AM
To: 'GEE, DEAN PW'
Cc: Tallam, Laxmana
Subject: RE: FDEP request for info

Dean:

I am not able to see the daily excel file in the attachment (it shows the excel spreadsheet icon only). Could you please check it and resend to us?

Thanks,

- Binod

Binod Basnet, P.E.

Florida Department of Health

Palm Beach County, Division of Environmental Public Health
P.O. Box 29, 800 Clematis Street, West Palm Beach, FL 33402
Phone: (561) 837-5936, **Fax:** (561) 837-5295

OUR MISSION: To protect, promote and improve the health of all people in Florida through integrated state, county and community efforts.

NOTE: Florida has a very broad public records law. Most written communications to or from state officials regarding business are public record available to the public and media, upon request. Your emails may, therefore, be subject to public disclosure.

From: GEE, DEAN PW [<mailto:dean.gee@pw.utc.com>]
Sent: Friday, September 13, 2013 3:51 PM
To: Basnet, Binod; Tallam, Laxmana
Cc: HORCHAR, EDWARD A SIK
Subject: FW: FDEP request for info

Binod and Laxmana,

Please refer to attached documents – Sikorsky records relating to specific permit conditions.

Please let us know if you have any questions

See attached

The first screen shot from PaintMan shows VOC for typical paints

The second screen shot from PaintMan shows HAP for typical paints

The third screen shot is a daily usage entry from PaintMan

The daily excel file is an export of part of September's paint use from PaintMan

Best regards,

Dean

Dean Gee

Environmental Engineer

WPB Site Environment, Health & Safety

Phone: 561 796-2108

Fax: 561 796-2787

E Fax: 860 622-3386

US Postal Mailing Address:

Pratt & Whitney

PO Box 109600

MS 717-03

West Palm Beach, FL 33410-9600

Street/Shipping Address:

Pratt & Whitney

17900 Beeline Highway (SR-710)

MS 717-03

Jupiter, FL 33478

CONFIDENTIALITY WARNING: This message may contain proprietary and/or privileged information of Pratt & Whitney and its affiliated companies. If you are not the intended recipient please 1) do not disclose, copy, distribute or use this message or its contents, 2) advise the sender by return e-mail, and 3) delete all copies (including all attachments) from your computer. Your cooperation is greatly appreciated.

This document contains no data that is subject to the EAR or ITAR.

1.8

The screenshot displays the 'Substance Tracking System' interface. At the top, the title bar reads 'Substance Tracking System' and the menu bar includes 'File', 'Edit', 'View', 'Data Entry', 'Reporting', 'Admin', 'Window', and 'Help'. Below the menu bar is a toolbar with various icons for actions like 'Import', 'Convert', 'Raw Usq', 'Conv Usq', 'PaintMan', 'Paint Booth', 'Fuel Burn', 'FBurn Sovr...', 'Substance', 'Find...', 'New', 'Delete', 'Retrieve', 'Exec', 'Copy T...', and 'Exit'.

The main window title is 'Summary Maintenance For Booth ID: W10-SB1'. Below this, the 'Booth Id:' is set to 'W10-SB1' (with '(Equipment Id)' in red text) and the location is 'WP PAINT FACILITY PAINT BOOTH #1'. The status is 'Active'. Other fields include 'Location: P-16 Big booth', 'Dept: 9401W', and 'Permit Nbr: 0990021-006-AV'. A 'More ...' button is on the right.

Navigation tabs at the bottom of the header include 'Setup', 'Limits', 'Material', 'Properties', 'Notify List', and 'Rpt List'. The 'Material' tab is selected, showing a table of materials:

Material Id	Density (Lbs/Gal)	Material Type	Thinner Allowed?	Substance Info	Status
06UTC-24158	13.1	<input checked="" type="radio"/> Paint <input type="radio"/> Thinner <input type="radio"/> Cleaner	<input type="radio"/> Yes <input checked="" type="radio"/> No	Density: 10.7423 % VOC: 32.64 MSDS Rev. Date: 4/13/2006	Active Updated: 05/27/2011 SAC S35947
10UTC-70159	11.54	<input checked="" type="radio"/> Paint <input type="radio"/> Thinner <input type="radio"/> Cleaner	<input type="radio"/> Yes <input checked="" type="radio"/> No	Density: 11.5856 % VOC: 29.35 MSDS Rev. Date: 8/11/2010	Active Updated: 09/01/2011 SAC S35947
10UTC-70160	9.09	<input checked="" type="radio"/> Paint <input type="radio"/> Thinner <input type="radio"/> Cleaner	<input type="radio"/> Yes <input checked="" type="radio"/> No	Density: 9.1259 % VOC: 37.25 MSDS Rev. Date: 8/11/2010	Active Updated: 09/01/2011 SAC S35947

At the bottom of the window, there are navigation buttons: 'SIM Materials for this Booth', left and right arrow buttons, and 'SIM Ctrl Systems for this booth'. The bottom right corner shows '1 of 58 Records'.

For 06UTC-24158, 13.1 lb/gal density is for the paint mix as applied (if multiple parts) and 10.7423 lb/gal is the density of one part.

Substance Tracking System
 File Edit View Data Entry Reporting Admin Window Help

Import Convert Raw Usq Conv Usq PaintMan Paint Booth Fuel Burn Fburn Sqr... Substance Find... New Delete Retrieve Save Copy To Exit

Summary Maintenance For Booth ID: W10-SB1

Booth Id: WP PAINT FACILITY PAINT BOOTH #1 Status: Active
 (Equipment Id)
 Location: P-16 Big booth Dept: 9401W Permit Nbr: More ...

Setup Limits Material Properties Notify List Rpt List

Material Id	Material/Pollutant Name	Density (Lbs/Gal)	VOC or TSP?	Applied Vs Purchased
<input type="text" value="06UTC-24158"/>	Jet Glo Express (Y- Z- Colors) Mfr: Sherwin Williams Co. (Seagrave)	<input type="text" value="13.1"/>	<input checked="" type="checkbox"/> VOC <input type="checkbox"/> TSP	Applied HAP? <input checked="" type="checkbox"/>
Pollutant: <input type="text" value="Total HAP"/>		Pollutant Content: <input type="text" value="0.26"/>	Uncontrolled %: <input type="text" value="1.985"/>	Ctrl Efficiency %: <input type="text" value="0.0"/>
Comments: <input type="text"/>				
<input type="text" value="06UTC-24158"/>	Jet Glo Express (Y- Z- Colors) Mfr: Sherwin Williams Co. (Seagrave)	<input type="text" value="13.1"/>	<input checked="" type="checkbox"/> VOC <input type="checkbox"/> TSP	Applied HAP? <input type="checkbox"/>
Pollutant: <input type="text" value="VOC"/>		Pollutant Content: <input type="text" value="3.5"/>	Uncontrolled %: <input type="text" value="26.718"/>	Ctrl Efficiency %: <input type="text" value="0.0"/>
Comments: <input type="text"/>				
<input type="text" value="10UTC-70159"/>	Imron Mix (N0006 EJ) Mfr: E I. DuPont de Nemours & Co	<input type="text" value="11.54"/>	<input checked="" type="checkbox"/> VOC <input type="checkbox"/> TSP	Applied HAP? <input checked="" type="checkbox"/>
Pollutant: <input type="text" value="Total HAP"/>		Pollutant Content: <input type="text" value="0.0"/>	Uncontrolled %: <input type="text" value="0.0"/>	Ctrl Efficiency %: <input type="text" value="0.0"/>
Comments: <input type="text"/>				

SIM Materials for this Booth SIM Ctrl Systems for this booth 1 of 112 Records

Total HAP content in 06UTC-24158 is 0.26 lb HAP/gal (pollutant content) or 1.985% (uncontrolled). This is $0.26 \div 13.1 \times 100 = 1.985\%$. This is for VOC HAP.

1.9

Substance Tracking System
 File Edit View Data Entry Reporting Admin Window Help

Import Convert Raw Usq Conv Usq PaintMan Paint Booth Fuel Burn Fburn Sqr... Substance Find... New Delete Retrieve Save Copy To Exit

Paint Booth Usage Entry W10-SB1

Clock Number: Booth Id: Start Date/Time: Contacts
 Switch Booth

Name: Ko, Reenu M Desc: WP PAINT FACILITY PAINT BOOTH #1

Activity Type:

Unit of Measure: Spray Gun:

Paint Material Id:

Paint Quantity: Object Coated:

Thinner Matl. Id:

Paint + Thinner Qty: End Date/Time: Save Usage!

Quantity Remaining:

Click Below to Add... Part Information

Part Number	Serial Number

ST#104

equipment_id	compute_0002	usage_date	compute_0004	units	raw_material_id	start_usage_nbr	inliner_material_id	inliner_usage_nbr	remaining_usage_nbr	record_nbr	end_usage_date	start_time	input_person_id	input_person_lpr_code	date_updated	stock_updated	stock_type_updat
W10-SB1	SEP	9/1/2013 15:18:00 2013	compute_0004	Gallons	RAWMA07-650-0	1		0	0	16516	9/1/2013 15:25:00	15:18	HS3792	SAC	9/7/2013 15:18:35	HS3792	SAC
W10-SB1	SEP	9/1/2013 15:19:00 2013	compute_0004	Ounces, vol.	RAWMA07-785-0	64		0	0	16517	9/1/2013 15:29:00	15:19	HS3792	SAC	9/7/2013 15:19:51	HS3792	SAC
W10-SB1	SEP	9/1/2013 15:21:00 2013	compute_0004	Ounces, vol.	RAWMA07-785-0	64		0	0	16518	9/1/2013 15:38:00	15:21	HS3792	SAC	9/7/2013 15:21:40	HS3792	SAC
W10-SB1	SEP	9/1/2013 15:22:00 2013	compute_0004	Ounces, vol.	RAWMA07-785-0	64		0	0	16519	9/1/2013 15:35:00	15:22	HS3792	SAC	9/7/2013 15:22:26	HS3792	SAC
W10-SB1	SEP	9/1/2013 15:23:00 2013	compute_0004	Ounces, vol.	RAWMA07-650-0	52		0	0	16520	9/1/2013 15:38:00	15:23	HS3792	SAC	9/7/2013 15:23:24	HS3792	SAC
W10-SB1	SEP	9/1/2013 15:24:00 2013	compute_0004	Quart	RAWMA07-963-0	3		0	0	16521	9/1/2013 15:40:00	15:24	HS3792	SAC	9/7/2013 15:24:17	HS3792	SAC
W10-SB1	SEP	9/1/2013 15:24:00 2013	compute_0004	Quart	RAWMA07-963-0	3		0	0	16522	9/1/2013 15:40:00	15:24	HS3792	SAC	9/7/2013 15:24:17	HS3792	SAC
W10-SB1	SEP	9/1/2013 15:33:00 2013	compute_0004	Ounces, vol.	RAWMA07-650-0	12		0	0	16530	9/5/2013 15:45:00	15:25	HS3792	SAC	9/7/2013 15:25:23	HS3792	SAC
W10-SB1	SEP	9/1/2013 15:34:00 2013	compute_0004	Ounces, vol.	RAWMA07-292	6		0	0	16531	9/6/2013 15:51:00	15:34	HS3792	SAC	9/7/2013 15:34:30	HS3792	SAC
W10-SB1	SEP	9/1/2013 15:35:00 2013	compute_0004	Gallons	RAWMA07-189-0	6		0	0	16532	9/6/2013 16:00:00	15:35	HS3792	SAC	9/7/2013 15:35:23	HS3792	SAC
W10-SB1	SEP	9/1/2013 15:42:00 2013	compute_0004	Ounces, vol.	RAWMA07-963-0	20		0	0	16533	9/6/2013 16:00:00	15:42	HS3792	SAC	9/7/2013 15:42:17	HS3792	SAC
W10-SB1	SEP	9/9/2013 22:12:00 2013	compute_0004	Ounces, vol.	RAWMA07-249-2	20		0	0	16574	9/6/2013 16:20:00	15:42	HS3792	SAC	9/11/2013 22:12:12	HS3792	SAC
W10-SB1	SEP	9/9/2013 22:13:00 2013	compute_0004	Ounces, vol.	RAWMA07-785-0	64		0	0	16575	9/6/2013 22:30:00	22:13	HS3792	SAC	9/11/2013 22:13:12	HS3792	SAC
W10-SB1	SEP	9/9/2013 22:15:00 2013	compute_0004	Ounces, vol.	RAWMA07-963-0	64		0	0	16576	9/9/2013 22:30:00	22:15	HS3792	SAC	9/11/2013 22:15:12	HS3792	SAC
W10-SB1	SEP	9/9/2013 22:23:00 2013	compute_0004	Ounces, vol.	RAWMA07-785-0	32		0	0	16577	9/9/2013 22:30:00	22:23	HS3792	SAC	9/11/2013 22:23:15	HS3792	SAC
W10-SB1	SEP	9/11/2013 23:02:00 2013	compute_0004	Gallons	RAWMA07-650-0	1		0	0	16580	9/11/2013 23:10:00	23:02	HS3792	SAC	9/11/2013 23:02:11	HS3792	SAC
W10-SB1	SEP	9/11/2013 23:02:00 2013	compute_0004	Gallons	RAWMA07-785-0	1		0	0	16581	9/11/2013 23:10:00	23:02	HS3792	SAC	9/11/2013 23:02:11	HS3792	SAC
W10-SB1	SEP	9/11/2013 23:03:00 2013	compute_0004	Gallons	RAWMA07-650-0	1		0	0	16582	9/11/2013 23:45:00	23:03	HS3792	SAC	9/11/2013 23:03:14	HS3792	SAC

This document contains no data that is subject to the EAR or ITAR