



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Hensel Phelps Construction Co.
6557 Hazeltine National Drive, Suite One
Orlando, Florida 32822

Commercial Crew and Cargo Processing Facility

Facility ID No. 0090239

PROJECT

Project No. 0090239-001-AC
Application for Major Air Construction Permit
Project Name: Renovation

COUNTY

Brevard County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

January 18, 22, 24, & 31, 2013

Prepared by Jeffrey Rustin, P.E.

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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:

Mr. Kirk J. Hazen, Vice President/District Manager
Hensel Phelps Construction Co.
6557 Hazeltine National Drive, Suite One
Orlando, Florida 32822

B. Professional Engineer:

Dr. Mitchell Jay Hait, Ph.D., P.E.,
Mitchell J. Hait, Ph.D., P.E., Inc.
404 Sebastian Square
St. Augustine, Florida 32095

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C. Project Location:

Kennedy Space Center
 Commercial Crew and Cargo Processing Facility (C3PF)
 Kennedy Space Center, FL 32899

D. Project Summary:

This project which authorizes construction/renovation/changes to hypergolic liquid processing scrubbers and associated equipment, including plumbing, aspirators, stacks and venting equipment.

E. Application Information:

Application Received on: 01/09/2013
 Application Complete: 01/09/2013

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. – Permits Required.	Y	Not exempt from general permitting requirements. Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Unconfined particulate matter emissions from vehicular traffic on paved and unpaved roads; and construction activities.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Hypergolic liquid processing scrubbers are a source of VOC emissions.
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	Brevard County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.

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Subject to:	Y/N	Comments
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category for this project.
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)	N	There is no applicable source category.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	Facility is a Title V source. Facility will obtain a Title V operation permit after completion of construction and commencement of operation.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	Compliance Test Requirements apply; however, given the 100 percent VE limit for this emission unit, compliance is inherent. Hence periodic VE testing is not required.

III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tons/year)
Total HAPS	Emission Unit No.1	8.37E-05
VOC	Emission Unit No.1	8.37E-05
NO _x	Emission Unit No.1	3.47E-02

Above information can be found in the Permit Application in Attachment 5: Emissions Estimates.

Potential VOC emissions from solvent cleaning limited to less than 4.5 tons per year to qualify for the Generic Emission Unit Exemption (Rule 62-210.300(3)(b), F.A.C.). The table below is essentially the same as Table 1: Potential Emission Summary on page 3 of the application cover letter. It includes emissions from solvent cleaning and the scrubbers.

Activity	Emissions	Potential Emissions (lbs/year)	Potential Emissions (tons/year)
Fuel Scrubber	VOC and HAP	0.2	8.4E-05
Oxidizer Scrubber	NO _x	69.4	3.5E-02
Solvent Cleaning	VOC	9,000	4.5

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IV. Federal NSPS and/or NESHAP Provisions

A. No applicable NSPS or NESHAP Provisions.

V. Other Considerations

The cleaning activity (cleaning e.g., flush and/or wipe) cannot be considered an insignificant activity at this time. A determination will be done during the Title V Permitting process.

VI. 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.

VII. 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, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

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).