

Space Propulsion

P. O. Box 109600
West Palm Beach, FL 33410-9600



Pratt & Whitney

A United Technologies Company

CERTIFIED MAIL #7099-3400-0014-0820-6100

RECEIVED

February 6, 2004

FEB 09 2004

Mr. Ajaya Satyal
Palm Beach County Health Dept.
PO Box 29 (901 Evernia Street)
West Palm Beach, FL 33402-0029

BUREAU OF AIR REGULATION

RE: Pratt & Whitney – West Palm Beach Facility
Title V Permit # 099-0021-002-AV
Initial Notification / Non-Applicability Status - NESHAP Subpart GGGGG – Site Remediation

Dear Mr. Satyal:

Please be advised that Pratt & Whitney has determined that NESHAP Subpart GGGGG – Site Remediation does not apply to our facility as explained below and is making this notification for completeness and as a courtesy.

United Technologies Corporation submits this initial notification of Maximum Achievable Control Technology (MACT) applicability for Subpart GGGGG with regards to the Pratt & Whitney West Palm Beach Facility. This notification is required under 40 CFR §63.9(b)(2) for existing major sources of hazardous air pollutants (HAPs) that are subject to an emission standard under 40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants. The potentially applicable standard is NESHAP Subpart GGGGG – Site Remediation. The data elements required for an initial notice are included as an attachment (MACT Initial Notification – Subpart GGGGG).

However, please note that Pratt & Whitney has determined that this facility is not subject to Subpart GGGGG per the exemption described at 40 CFR §63.7881(b)(3). Our site remediation activity is either authorized or required by our RCRA permit and is specifically exempted from this Subpart per 40 CFR §63.7881(b)(3).

Also, we are in the process of formalizing our HAPs minor source status by modifying our Title V permit to include permit conditions that limit our potential to emit HAPs below the major source thresholds. Our current HAPs emissions are currently well below the major source status. When these permit conditions are issued, we will no longer meet the criteria for this subpart applicability because of the minor source status.

Please feel free to contact me at 561-796-2448 or Dean Gee (561-796-2108) if you have any questions.

Best regards,

David Alberghini, Manager
Environment, Health, and Safety

Copies: Ms Cindy Phillips, P.E.
FDEP Bureau of Air Regulation

MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Mr. Doug Neeley
Air, Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960

File: B.3.4.2 (new) – Title V – Part 1 Application - Case by Case MACT
B.3.5.6 (new) – NESHAP - Site Remediation

MACT Initial Notification – Subpart GGGGG

Outlined below is the information required for an initial notification for this Subpart:

Name and Address of the Owner or Operator (§63.9(b)(2)(i))	United Technologies Corporation, Pratt & Whitney PO Box 109600, M/S 717-03 West Palm Beach, FL 33410-9600
Physical Address of the Affected Source (§63.9(b)(2)(ii))	17900 Beeline Highway, Jupiter, FL 33478
Identification of the Relevant Standard Triggering Notification and the Sources Compliance Date (§63.9(b)(2)(iii))	Subpart GGGGG – National Emission Standards for Hazardous Air Pollutants: Site Remediation. Compliance must be achieved by October 9, 2006 (see (§63.7883(a)))
Brief Description of the Nature, Size, Design, and Method of Operation of the Source (§63.9(b)(2)(iv))	The West Palm Beach Pratt & Whitney facility performs gas turbine / jet engine testing and rocket engine manufacturing and testing. This includes manufacturing (production and development machining and surface treatment), experimental and production development and testing (including engine and component test cells), engine assembly, overhaul and repair, shipping and storage. A number of ancillary activities to support the site and these operations are also performed under the Title V permit.
Identification of Each Point of HAP Emissions (§63.9(b)(2)(iv))	HAPs are potentially emitted from process vents, remediation material management units (for example, tanks, containers, separators, or transfer systems), closed vent and control systems, and/or equipment leaks (i.e., valves and pumps) associated with the remediation of contaminated environmental media or certain stored or disposed materials that pose a reasonable potential threat to contaminate environmental media.
Type of Facility (§63.9(b)(2)(v))	The West Palm Beach facility is currently listed as a major source of HAPs. However, due to equipment modifications and changes to facility operations, the facility's current HAP emissions are well below the major source thresholds. Pratt & Whitney is applying to formalize minor source status via enforceable permit conditions by modifying the Title V permit. (see Note below).

Note:

Pratt & Whitney has determined that emission source controls and operational changes at the West Palm Beach facility have reduced the potential HAP emissions below Major Source thresholds (i.e., 10 tons/year of a single HAP, 25 tons/year of a combination of all HAPs). As such, Pratt & Whitney has submitted a permit modification to formalize HAPs minor source status by imposing permit conditions that will create enforceable limits for HAPs emissions. These Title V permit conditions will limit the potential to emit HAPs below the major source thresholds. Pratt & Whitney anticipates that the Title V permit conditions to limit HAPs potential to emit below the major source thresholds will be issued prior to October 9, 2006.

Space Propulsion

P. O. Box 109600
West Palm Beach, FL 33410-9600



Pratt & Whitney

A United Technologies Company

CERTIFIED MAIL: 7099-3400-0014-0820-5073

March 8, 2005

Mr. Ajaya Satyal
Palm Beach County Health Department
PO Box 29 (901 Evernia Street)
West Palm Beach, FL 33402-0029

RECEIVED
MAR 15 2005
BUREAU OF AIR REGULATION

RE: Initial Notification Status - NESHAP Subpart DDDDD –
40 CFR Part 63, Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters and 40 CFR Part 63, Subpart A, §63.9(b) General Provisions.

Dear Mr. Satyal:

Please be advised that Pratt & Whitney has determined that NESHAP Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters does apply to our facility as explained below.

Pratt & Whitney operates 3 boilers and 2 process heaters that must meet the compliance requirements for "Population II" units and therefore require initial notification only. No other compliance requirements apply. Details for these affected units are described in the attachment.

United Technologies Corporation submits this initial notification of Maximum Achievable Control Technology (MACT) applicability for Subpart DDDDD with regards to the Pratt & Whitney West Palm Beach Facility.

This notification is required under 40 CFR §63.9(b)(2) for existing major sources of hazardous air pollutants (HAPs) that are subject to an emission standard under 40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants. The applicable standard is NESHAP Subpart DDDDD – Boilers and Process Heaters. The data elements required for this initial notice are included as an attachment (MACT Initial Notification – Subpart DDDDD).

Please feel free to contact me at 561-796-2448 or Dean Gee (561-796-2108) if you have any questions.

Sincerely,

David Alberghini, Manager
Environment, Health, and Safety

Cc: Ms Cindy Phillips, P.E. ✓
FDEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Mr. Doug Neeley
Air, Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960

File: B.3.4.2 – Title V – Part 1 Application - Case-by-Case MACT

**NESHAP Subpart DDDDD
INITIAL NOTIFICATION REPORT**

What is the purpose of this form?

This form is an example of how you can meet the requirement to submit an INITIAL NOTIFICATION REPORT under the following regulation: 40 CFR Part 63, Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters and 40 CFR Part 63, Subpart A, §63.9(b) General Provisions.

This form is provided for your convenience. You are not required to use this form and may choose your own format to submit the required information.

By when must I submit an Initial Notification?

You must submit an Initial Notification not later than March 12, 2005 (120 calendar days after the effective date of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters), or within 120 calendar days after your boiler or process heater becomes subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, whichever is later.

To whom do I submit this Initial Notification?

The rule states that notification must be sent to the EPA Administrator. In practice, the Administrator delegates implementation and enforcement to EPA Regional Offices listed at 40 CFR 63.13, Subpart A (General Provisions) servicing your area. You should first contact your State or local air pollution control agency to see if it has taken delegation to act in place of the EPA Administrator. If so, your initial notification and other reports should be sent to that agency. If not, reports should be sent to the EPA Regional Office.

Do other documents meet the requirements of the Initial Notification?

Application for Approval of Construction or Reconstruction

If your boiler or process heater will be a new or reconstructed major affected source, you are required by 40 CFR 63.5(d) to submit an Application for Approval of Construction or Reconstruction as soon as practicable before actual construction or reconstruction begins. If you are also required to submit an Initial Notification (not all new or reconstructed units are required to submit Initial Notifications), you may, as allowed under 40 CFR 63.9(b)(1)(iii), submit this Application for Approval of Construction or Reconstruction in lieu of an Initial Notification. If you choose to take advantage of this option, you must submit the Application for Approval of Construction or Reconstruction according to the time frames established in 40 CFR 63.5(d) instead of the time frames established for submitting Initial Notifications in 40 CFR 63.7545. Additionally, it is important to note that all sources that are new or reconstructed major affected sources must meet the requirements of 40 CFR 63.9(b)(4) in addition to complying with the requirements of 40 CFR 63.5(d).

INITIAL NOTIFICATION REPORT

SECTION I GENERAL INFORMATION

This form is being submitted in accordance with 40 CFR 63.9(b) and as required by 40 CFR 63.7545.

If you own or operate an affected source, submit this report by MARCH 12, 2005, or WITHIN 120 CALENDAR DAYS after your boiler or process heater becomes subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, whichever is later.

- A. Print or type the following information for each facility for which you are making initial notification: (§63.9(b)(2)(i)-(ii))

Operating Permit Number (IF AVAILABLE)		Facility I.D. Number (IF AVAILABLE)	
0990021-006-AV			
Responsible Official's Name/Title			
David J. Alberghini / Manager, Environment, Health & Safety			
Street Address			
17900 Beeline Highway, M/S 717-03			
City	State	ZIP Code	
Jupiter	FL	33478	
Facility Name			
Pratt & Whitney, Division of United Technologies Corp.			
Facility Street Address (If different than Responsible Official's Street Address)			
Facility Local Contact Name		Title	Phone
Dean Gee		Environmental Engineer	561-796-2108
City	State	ZIP Code	
Jupiter	FL	33478	

Check the box that applies. (§63.9(b)(2)(v))

- My facility is a major source of Hazardous Air Pollutants (HAP)
- My facility is an area source of HAP

NOTE: A major source is a source that emits or has the potential to emit 10 tons per year, or more, of any one HAP or 25 tons per year, or more, of multiple HAP. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line, not just inside the facility itself.

If you answered that your facility is an area source, the facility is not subject to this rule. Records of your applicability determination must be maintained on site for 5 years. See 40 CFR 63.10(b)(3). If you answered that your facility is a major source for HAP emissions, complete the remaining questions.

- C. Indicate the relevant standard or other requirement that is the basis for this notification and the source's compliance date: (§63.9(b)(2)(iii))

Basis for this notification (relevant standard or other requirement)	Anticipated Compliance Date (mm/dd/yy)
National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD)	Initial Notification will be submitted prior to 3/12/05. There are no further requirements for these sources.

**SECTION II
SOURCE DESCRIPTION**

- A. Briefly describe the nature, size, design, and method of operation of the source. (§63.9(b)(2)(iv))

The West Palm Beach Pratt & Whitney facility includes manufacturing, research/development, and testing of experimental and production rocket engines and their components. This includes engine assembly, overhaul and repair, shipping and storage of rocket engines. Testing of jet engines and their components is also performed. There are 4 boilers that provide heat and steam to the facility and 8 process heaters used to heat air and/or jet fuel for testing. All are natural gas or propane gas fired. None fire liquid or solid fuels. Only 5 of these boilers and heaters exceed 10 MMBTU/hr and are therefore affected units. Since all our affected units are existing and burn only gaseous fuel, the only applicable condition is initial notification.

NOTE: If the same information requested above is contained in a title V permit application or permit, you may attach the relevant pages from that document to this notification and reference those pages above.

- B. Identify the types of emission points within the affected source subject to the relevant standard and the types of hazardous air pollutants emitted. (§63.9(b)(2)(iv))

Types of Emission Points

NOTE: Boilers and process heaters are typically served by chimneys or stacks for flue gas release and dispersion.

We operate 4 boilers and 8 process heaters. Emission Unit -022 includes 2 natural gas fired boilers, each rated 54 MMBTU/hr. Emission Unit -016 includes 1 natural gas fired boiler, rated at 42 MMBTU/hr. Emission Unit -066 includes 1 propane gas fired boiler and is rated 7 MMBTU/hr and is exempt. The 8 process heaters are all included in Emission Unit-059 and all fire natural gas only. Only 2 process heaters are rated more than 10 MMBTU/hr. Process heater HR-17-D2 is rated 15 MMBTU/hr and is used for heating air. Process heater HR-1-A9 is rated 16 MMBTU/hr and is used to heat fuel.

Types of HAP Emitted

Check the boxes indicating the principal types of HAP emitted by the affected source (i.e., boilers and process heaters). Check all that apply. For example, coal and residual oil fired boilers or process heaters would typically emit all three types of HAP. Natural gas fired boilers or process heaters would typically emit organic HAP.

- Metal HAP (for example, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel, selenium)
- Organic HAP (for example, acetaldehyde, benzene, formaldehyde, toluene, xylenes)
- Acid gas HAP (for example, hydrogen chloride, hydrogen fluoride)

**SECTION III
SPECIFIC REQUIREMENTS**

Section 63.7545(b)(2) requires you to include in this Initial Notification a signed statement indicating whether your affected source has a federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent.

- My facility has a federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent for the following boilers and process heaters.

Use the facility identification number from section I.A.

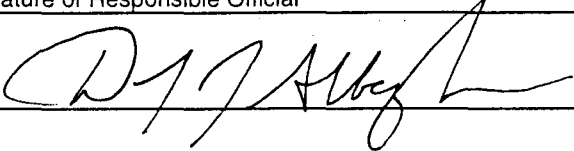
- My facility does not have a federally enforceable permit that limits the annual capacity factor for any individual boiler or process heater to less than or equal to 10 percent.

**SECTION IV
CERTIFICATION**

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained or referenced in this initial notification report are true, accurate, and complete.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
David J. Alberghini	Manager, Environment, Health & Safety	March 9, 2005

Signature of Responsible Official



Note: Responsible official is defined in 40 CFR §63.2, §70.2 and §71.2 and in EPA-approved State title V operating permits programs.