



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

FILE

David B. Struhs
Secretary

October 13, 2003

Mr. David Alberghini
Pratt & Whitney
PO Box 109600
West Palm Beach, FL 33410-9600

Re: Final National Emission Standards for Hazardous Air Pollutants (NESHAP) - Site Remediation

Dear Mr. Alberghini:

The 112(j) notification that was submitted for Pratt & Whitney last year indicated that the facility may be subject to the NESHAP (40 CFR 63 Subpart GGGGG) for Site Remediation. You may be interested in knowing that the USEPA published the **final** NESHAP regulation for this source category in the Federal Register on October 8, 2003. Therefore, 112(j) requirements no longer apply to site remediation activities.

If you are interested in reading the final standards, the NESHAP and a Fact Sheet explaining the standards may be accessed through the USEPA website at <http://www.epa.gov/ttn/atw/siterm/sitermpg.html>. If you do not have access to the Internet, and would like to receive a paper copy of the final standards in the mail, please contact Mr. Bobby Bull at (850) 921-9585 or Robert.Bull@dep.state.fl.us.

"Existing" affected sources must be in compliance with Subpart GGGGG standards by October 9, 2006. For the purposes of Subpart GGGGG, affected sources are "existing" if construction or reconstruction of the affected source commenced before July 30, 2002. For compliance dates for "new" affected sources, please refer to section 63.7883 of the standards.

Since the submitted 112(j) notification also indicated that Pratt & Whitney may be subject to Subpart DDDDD, I/C/I Boilers and Process Heaters, Pratt & Whitney may still be required to submit a 112(j) MACT Title V permit revision application for this subpart by April 28, 2004, unless this proposed subpart is final by then, or unless a federally-enforceable limitation on emissions of hazardous air pollutants is effective by then.

If you have any questions concerning this information, please contact me at (850)921-9534 or Cindy.Phillips@dep.state.fl.us.

Sincerely,

Cindy L. Phillips, P.E.
Bureau of Air Regulation

c: James Stormer, Palm Beach County Health Department

"More Protection, Less Process"

Printed on recycled paper.



Jeb Bush
Governor

Department of Environmental Protection

FILE

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Scruhs
Secretary

June 27, 2003

Mr. David Alberghini
Pratt and Whitney
PO Box 1096000
West Palm Beach, FL 33410-9600

Re: Final National Emission Standards for Hazardous Air Pollutants (NESHAP):
Engine Test Cells/Standards

Dear Mr. Alberghini:

You indicated, in the 112(j) notifications that you submitted last year, that Pratt and Whitney may be subject to the NESHAP (40 CFR 63 Subpart P) for Engine Test Cells/Standards. You may be interested in knowing that on May 27, 2003, the USEPA published the **final** NESHAP for Engine Test Cells/Standards.

If you are interested in reading the final Subpart P standards, the NESHAP may be accessed through the USEPA website <http://www.epa.gov/ttn/atw/engtest/engtestpg.html>. If you do not have access to the Internet, and would like to receive a paper copy of the final standards in the mail, please contact Mr. Bobby Bull at (850) 921-9585 or Robert.Bull@dep.state.fl.us.

For the purposes of Subpart P, "existing" affected sources are sources that commenced construction on or before May 14, 2002. "Existing" affected sources do not have to meet the requirements of Subpart P. Only "new" or "reconstructed" affected sources will have to meet the requirements of Subpart P.

Since you also indicated in your 112(j) notification that Pratt and Whitney may be subject to other proposed 40 CFR 63 NESHAP subparts, you may be required to submit a 112(j) MACT Title V permit revision application by the application deadlines listed below unless these proposed subparts are final by then.

<u>Subpart</u>	<u>112(j) Application Deadline</u>
Subpart GGGGG, Site Remediation	10/30/03
Subpart DDDDD, I/C/I Boilers and Process Heaters	4/28/04

If you have reviewed the applicability of these proposed NESHAPs, and have decided that neither they nor any other proposed NESHAP applies to your facility, then 112(j) no longer applies to your facility.

If you have any questions concerning this information, please contact me at (850)921-9534 or Cindy.Phillips@dep.state.fl.us.

Sincerely,

Cindy L. Phillips, P.E.
Bureau of Air Regulation

c: James Stormer, Palm Beach County Health Department

"More Protection, Less Process"

Printed on recycled paper.

Space Propulsion

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



RECEIVED

MAY 17 2002

BUREAU OF AIR REGULATION

Certified Mail # 7000-0520-0016-6762-6341

May 15, 2002

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

RE: Clean Air Act Section 112(j) MACT Notification for Pratt & Whitney
Part 1 Application for Case by Case MACT
Title V Permit # 099-0021-002-AV

Please find enclosed the Pratt & Whitney notification information as requested by Florida Department of Environmental Protection letter of April 5, 2002 regarding potential emission sources included in the MACT source categories affected by CAA Section 112(j) (MACT hammer). This notification complies with the Part 1 application for case by case MACT determination.

As detailed in the attachment, we have determined that we have equipment or activities that are covered by three (3) of the MACT source categories. This includes a total of ten (10) emission units. No Section 112(g) MACT determinations for any emission sources have been made.

This submitted notification is based on our best analysis of the currently available information regarding applicability criteria for the EPA listed MACT source categories.

Also, please note that Pratt & Whitney believes that due to changes in our operations since the submittal of our Title V permit application in 1996, our facility is no longer a HAPs major source. Many HAPs emissions sources have been eliminated and/or shutdown eliminating actual emissions and reducing our potential to emit. However, because not all of these changes have been incorporated into the Title V permit as enforceable limits, we are submitting a notification based on HAPs major source status.

Should our HAPs potential to emit be formalized as a minor source, these MACT applicability determinations would become void.

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

Best regards,

A handwritten signature in blue ink that reads "John K. Sillan".

John K. Sillan, Deputy Manager
Facility and Environment, Health, and Safety

File: B.3.4.2 (new) – Title V – Part 1 Application - Case by Case MACT
B.3.5.5 (new) – MACT Hammer Notification

**Part 1 Application for Case-by-Case MACT Determination
Pursuant to Clean Air Act Section 112(j) and 40 CFR 63.50-63.56**

1. **Company Name:** Pratt & Whitney, Division of United Technologies Corp.
2. **Mailing Address:** Pratt & Whitney C/O John K. Sillan
PO Box 109600, M/S 717-03
West Palm Beach, FL 33410-9600
3. **Name of Major Source:** Pratt and Whitney, Title V Permit # 099-0021-002-AV
4. **Location of Major Source:** 17900 Beeline Highway, Jupiter, FL 33478
5. **Description of Major Source:** 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.
6. **Applicable Section 112 Source Categories:** See Attachment.
7. **Types of sources belonging to the relevant source category present at the major source:** See Attachment.
8. **Affected sources at the major source for which a section 112(g) MACT determination has been made:** N/A
9. **Pursuant to 40 CFR 63.52(d)(1) and 63.52(e)(2)(i), Pratt & Whitney requests the Florida Department of Environmental Protection to determine whether the following sources belong in a category or subcategory for which the Administrator has failed to promulgate an emission standard under this part:** Voluntary Corrective Action for cleanup (remediation) of soil and water contamination.

I certify, based on information and belief, that the information contained in this application is accurate and true to best of my knowledge.



John K. Sillan
Deputy, Manager of Facilities and Environmental, Health, and Safety
Title V Permit - Responsible Official for Pratt & Whitney

May 15, 2002
Date

Attachment
Part 1 Application for Case-by-Case MACT Determination
Pursuant to Clean Air Act Section 112(j) and 40 CFR 63.50-63.56

Please find indicated below those categories for which Pratt & Whitney can reasonably determine that one or more sources at our Title V Permit facility belong in the category. For those checked categories, the types of sources and emission units (where applicable) belonging to the relevant source category are listed. Please note that these determinations were made prior to the publication of proposed or final rules with the best available information. Upon publication of these final regulations, Pratt & Whitney will re-assess the applicability for our facility

Source Category	MACT Applies?	Types of sources / Emission Units in source category	Applicability Notes
Combustion Turbines	<input type="checkbox"/>		P&W is constructing a test facility for uninstalled natural gas fired combustion turbines. These combustion turbines are either research development units or pre-delivery quality assurance units. Neither type are believed to be covered by this MACT standard. Test stands listed under Engine Test Facility.
Engine Test Facilities and Rocket Testing Facilities	<input checked="" type="checkbox"/>	Aircraft Engine (jet turbine) Test Cells (EU-69) Rocket Engine Test Stands LOX/Kerosene Rocket Stand (EU-75) Natural Gas Fired Turbine Stands (EU-77)	EU-75 is permitted but not constructed yet – Emission Unit may include multiple individual sources. EU-77 is under construction. Emission Unit may include multiple individual sources.
Boilers and Process Heaters <ul style="list-style-type: none"> ▪ Industrial Boilers ▪ Institutional/Commercial Boilers ▪ Process Heaters 	<input checked="" type="checkbox"/>	Industrial Boilers (EU-16, EU-22, EU-66) Process Heaters (EU-45, EU-59)	Pratt & Whitney operates Boilers of various capacities and various Process Heaters used to support manufacturing and test operations. Natural Gas and Propane fired. Emission Unit may include multiple individual sources.
Lightweight Aggregate	<input type="checkbox"/>		
Reciprocating Internal Combustion Engines	<input type="checkbox"/>		Diesel engines used for only emergency purpose and/or < 500 HP. No spark ignition stationary engines.
Primary Copper Smelting	<input type="checkbox"/>		
Primary Magnesium Refining	<input type="checkbox"/>		
Coke Ovens: Pushing, Quenching and Battery Stacks	<input type="checkbox"/>		
Integrated Iron and Steel Manufacturing	<input type="checkbox"/>		
Iron Foundries	<input type="checkbox"/>		
Steel Foundries	<input type="checkbox"/>		
Asphalt Roofing Manufacturing and Asphalt Processing	<input type="checkbox"/>		
Asphalt/Coal Tar Application to Metal Pipes (subsumed with Misc. Metal Parts & Products)	<input type="checkbox"/>		
Brick and Structural Clay Products Manufacturing/ Clay Minerals Processing	<input type="checkbox"/>		
Lime Manufacturing	<input type="checkbox"/>		
Refractories Manufacturing (formerly Chromium Refractories)	<input type="checkbox"/>		
Taconite Iron Ore Processing	<input type="checkbox"/>		
Organic Liquids Distribution (Non- Gasoline)	<input type="checkbox"/>		Pratt & Whitney operates a JP8 jet fuel tank farm and transfer system for onsite testing engines and components only.
Auto and Light Duty Truck (Surface Coating).	<input type="checkbox"/>		
Large Appliance (Surface Coating)	<input type="checkbox"/>		

**Attachment
Part 1 Application for Case-by-Case MACT Determination
Pursuant to Clean Air Act Section 112(j) and 40 CFR 63.50-63.56**

Source Category	MACT Applies?	Types of sources / Emission Units in source category	Applicability Notes
Metal Can (Surface Coating)	<input type="checkbox"/>		
Metal Coil (Surface Coating)	<input type="checkbox"/>		
Metal Furniture (Surface Coating)	<input type="checkbox"/>		
Miscellaneous Metal Parts and Products (Surface Coating)	<input type="checkbox"/>		This facility is subject to the Aerospace Parts & Products MACT.
Paper and Other Webs (Surface Coating).	<input type="checkbox"/>		
Plastic Parts and Products (Surface Coating)	<input type="checkbox"/>		This facility is subject to the Aerospace Parts & Products MACT.
Printing, Coating, and Dyeing of Fabrics.	<input type="checkbox"/>		
Wood Building Products (Surface Coating) (formerly Flat Wood Paneling)	<input type="checkbox"/>		
Municipal Solid Waste Landfills	<input type="checkbox"/>		
Site Remediation	<input checked="" type="checkbox"/>	Remediation of soil and water.	Pratt & Whitney conducts remediation under CERCLA/RCRA /FDEP permits that is exempt from MACT. However, any additional contamination that is discovered would be remediated regardless of whether it is covered by a permit or order, and therefore potentially non-exempt from MACT. No Emission Unit # assigned.
Vegetable Oil Production	<input type="checkbox"/>		
Cellulose Production Manufacturing <ul style="list-style-type: none"> ▪ Cellulose Ethers Production ▪ Caroxymethylcellulose Production ▪ Cellulose Ethers Production ▪ Cellulose Food Casing Manufacturing ▪ Cellophane Production ▪ Methylcellulose Production ▪ Rayon Production 	<input type="checkbox"/>		
Miscellaneous Organic NESHAP <ul style="list-style-type: none"> ▪ Alkyd Resins Production ▪ Ammonium Sulfate Production--Caprolactam By-Product Plants ▪ Maleic Anhydride Copolymers Production ▪ Manufacture of Paints, Coatings and Adhesives ▪ Polyester Resins Production ▪ Polymerized Vinylidene Chloride Production ▪ Polymethyl Methacrylate Resins Production ▪ Polyvinyl Acetate Emulsions Production ▪ Polyvinyl Alcohol Production ▪ Polyvinyl Butyral Production ▪ Benzyltrimethylammonium Chloride Production ▪ Carbonyl Sulfide Production ▪ Chelating Agents Production ▪ Chlorinated Paraffins Production ▪ Ethylidene Norbornene Production ▪ Explosives Production ▪ Hydrazine Production 	<input type="checkbox"/>		

Attachment
Part 1 Application for Case-by-Case MACT Determination
Pursuant to Clean Air Act Section 112(j) and 40 CFR 63.50-63.56

Source Category	MACT Applies?	Types of sources / Emission Units in source category	Applicability Notes
<ul style="list-style-type: none"> ▪ OBPA/1,3-Diisocyanate Production ▪ Photographic Chemicals Production ▪ Phthalate Plasticizers Production ▪ Rubber Chemicals Manufacturing ▪ Symmetrical Tetrachloropyridine Production ▪ Quaternary Ammonium Compounds Production 			
Polyvinyl Chloride and Copolymers Production	<input type="checkbox"/>		
Reinforced Plastic Composites Production	<input type="checkbox"/>		
Generic MACT Categories Carbon Black Production Spandex Production Cyanide Chemicals Manufacturing Ethylene Processes	<input type="checkbox"/>		
Mercury Cell Chlor-Alkali Plants (Formerly Chlorine Production)	<input type="checkbox"/>		
Hydrochloric Acid Production and Fumed Silica Production	<input type="checkbox"/>		
Flexible Polyurethane Foam Fabrication Operations	<input type="checkbox"/>		Commercial polyurethane stock used as purchased w/o fabrication or processing.
Friction Materials Manufacturing	<input type="checkbox"/>		
Miscellaneous Viscose Processes	<input type="checkbox"/>		
Paint Stripping Operations	<input type="checkbox"/>		
Plywood and Composite Wood Products (formerly Plywood and Particle Board Manufacturing)	<input type="checkbox"/>		
Rubber Tire Manufacturing	<input type="checkbox"/>		
Semiconductor Manufacturing	<input type="checkbox"/>		
Wet-Formed Fiberglass Mat Production	<input type="checkbox"/>		



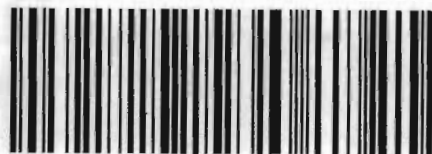
Pratt & Whitney

A United Technologies Company

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

ATTN MS CINDY PHILLIPS, P.E.
FDEP BUREAU OF AIR REGULATION
MAIL STATION 5505
2600 BLAIRSTONE RD
TALLAHASSEE FL 32399-2400

CERTIFIED MAIL



7000 0520 0016 6762 6341



UNITED STATES
POSTAL SERVICE



0000

32399

U.S. POSTAGE
PAID
WEST PALM BEACH, FL
33406
MAY 15, 02
AMOUNT

\$4.17

00049472-27

RECEIPT
TIED



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

June 14, 2002

Mr. John K. Sillan
Deputy Manager
Facility and Environment, Health, and Safety
Pratt & Whitney
P.O. Box 109600
West Palm Beach, FL 33410-9600

Re: Request for Determination of MACT Applicability

Dear Mr. Sillan:

In response to your letter dated May 15, 2002 which requests that the Department make a determination of MACT applicability for your facility, I have attached Chapter 28-105, F.A.C., Declaratory Statements, which specifies the procedure that you must follow in order for us to comply with your request.

The Department's Agency Clerk is Kathy Carter. Her address is:

Kathy Carter, Agency Clerk
Florida Department of Environmental Protection
MS 35
3900 Commonwealth Boulevard
Tallahassee FL 32399-3000

Thank you for submitting the 112(j) notification information. Your information submittal appears to meet our current 112(j) requirements.

Please be aware that, although your letter refers to this information submittal as a "Part 1 Application," the Department does not recognize your submittal as a state permit application and has no plans to process it as such.

No further 112(j) information is needed from you at this time. If you have any questions, concerning this matter, please contact me at 850/921-9534.

Sincerely,

Cindy L. Phillips, P.E.
Bureau of Air Regulation

attachment

"More Protection, Less Process"

Printed on recycled paper.

CHAPTER 28-105, F.A.C.

DECLARATORY STATEMENTS

28-105.001 Purpose and Use of Declaratory Statement.

A declaratory statement is a means for resolving a controversy or answering questions or doubts concerning the applicability of statutory provisions, rules, or orders over which the agency has authority. A petition for declaratory statement may be used only to resolve questions or doubts as to how the statutes, rules, or orders may apply to the petitioner's particular circumstances. A declaratory statement is not the appropriate means for determining the conduct of another person or for obtaining a policy statement of general applicability from an agency. A petition for declaratory statement must describe the potential impact of statutes, rules, or orders upon the petitioner's interests.

28-105.002 The Petition.

A petition seeking a declaratory statement shall be filed with the clerk of agency that has the authority to interpret the statute, rule, or order at issue and shall provide the following information:

(1) The caption shall read:

Petition for Declaratory Statement

Before (Name of Agency)

(2) The name, address, telephone number, and any facsimile number of the petitioner.

(3) The name, address, telephone number, and any facsimile number of the attorney or qualified representative (if any) of the petitioner.

(4) The statutory provision(s), agency rule(s), or agency order(s) on which the declaratory statement is sought.

(5) A description of how the statutes, rules, or orders may substantially affect the petitioner in the petitioner's particular set of circumstances.

(6) The signature of the petitioner or of the petitioner's attorney or qualified representative.

(7) The date.

28-105.003 Agency Disposition.

The agency may hold a hearing to consider a petition for declaratory statement. If the agency is headed by a collegial body, it shall take action on a petition for declaratory statement only at a duly noticed public meeting. If a hearing is held, it shall be conducted in accordance with Sections 120.569 and 120.57(2), F.S. The agency may rely on the statements of fact set out in the petition without taking any position with regard to the validity of the facts. Within 90 days of the filing of the petition, the agency shall render a final order denying the petition or issuing a declaratory statement.