STATEMENT OF BASIS

Martin Electronics, Inc.
Perry Facility

Facility ID No.: 1230047
Taylor County

Renewal Title V Air Operation Permit
PROPOSED Permit No.: 1230047-003-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Martin Electronics, Inc. is a small to medium size explosive and pyrotechnic device manufacturer. Facility processes include Raw Material/Product Storage, Production, Plating Operations, Test Facilities, Thermal Treatment, and Fuel storage.

Martin Electronics has various production lines located throughout the plant. Each of the products manufactured by the plant is done so through a dedicated production line. The production of pyrotechnics generally consists of blending, forming, packaging/encasing, and shipment preparation.

Hand grenade fuse parts are produced through the following processes: captive zinc die casting, vibratory deburring, noncyanide alkaline zinc electroplating and noncyanide chromate conversion coating operations. These processes are conducted on an intermittent basis, dependent upon contract requirements and schedules. The chromate conversion coating and zinc electroplating waste streams are individually chemically treated in the Industrial Wastewater Treatment Plant. Testing facilities are used to verify that the products manufactured meet contract specification.

The Open Burn Unit consists of a single unit limerock pad which includes four diked concrete containment pads. Pans are used on each containment pad. The Open burn Unit receives all waste residues, pyrotechnic powders, contaminated containers, and waste industrial materials contaminated with pyrotechnic powders, metal bearing pyrotechnic powders and solvent (Acetone) contaminated pyrotechnic powders. The Open Burn Unit shall be operated in accordance with the RCRA operation permit.

This renewal project includes the applicable provisions of 40 CFR 61 Subpart E: National Emission Standard for Mercury for the sludge dryer thereby making the sludge dryer a regulated emission unit.

Based on the renewal Title V permit application received **September 8, 2005** this facility is a major source of hazardous air pollutants (HAPs) and also Volatile Organic Compounds (VOCs).

Project 003-AV: This project is for the renewal of Air Permit No. 1230047-002-AV and to incorporate 40 CFR 61 Subpart E, National Emission Standard for Mercury.
[40 CFR 61.50]

Appendix CP- Compliance Plan has been added to this permit to allow the facility to submit and receive an alternate test procedure for mercury. If an alternate test procedure is not approved, Martin Electronics must complete Mercury testing in accordance with USEPA Test Method 105 of 40 CFR 61 Appendix B within 90 days of the USEPA, Region 4 determination.

Alternate Sampling Procedure For Mercury: Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B was approved by EPA on November 1, 2006.

Permitting Note:

The air monitoring specific conditions (A.4.- A.9.) have been removed from the permit. The three years of data the facility collected, demonstrates that there is not a threat from air emissions associated with the thermal treatment process.