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|  1030447 80700 |  |
|  **FACILITY:** **Raytheon Company** |  **PERMIT ID: 1608** |
|  **C3I Manufacturing** |  **DISTRICT:** Southwest |
|  **ADDRESS:** 7887 Bryan Dairy Road | **CONTACT PHONE:**  |
|  Largo, FL | 727-302-4793 |
|  **ARMS NO:****1030447 001** | **PERMIT NO:** | **Expiration Date:** 5/24/15**Renewal Date:** 2/23/15 |
|  | **1030447-004-AO** |  |
|  |  | **Test Due Date:** NA  |
| **EMISSION UNIT DESCRIPTION :** **Electronic Communications Manufacturing: Electrical Assembly, Paint Touch-up/refinishing, Conformal Coating, Soldering Operations, Wire Marking, Non-Metal Solvent Cleaning, Tetra-Etch Process, and Potting** |
| **INSPECTION DATE:** | **ARMS INSPECTION TYPE:** | **COMPLIANCE STATUS:** |
|  |
|  | **1 December 2011** |  |  | INS**1** | **✓** | **INS2** |  | INS**3** |  | FUI | **✓** | **IN** |  | MNC |  | SNC |
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| **INSPECTION TYPE:** | **✓** | **Initial** |  | Re-inspection |  | Complaint |  | Drive-by |  | Quarterly |
|  |
| **✓** | **A. General Review:** |
| **1.** | Permit File Review | *[x]*  | Yes | *[ ]*  | No |
|  | ***C****omments: There were no changes to the permit or the in-compliance status of the facility in the time since the previous inspection on 11/19/2010.* |  |  |  |  |
| **2.** | Introduction and Entry | *[x]*  | Yes | *[ ]*  | No |
|  | ***C****omments: Mr. Dennis Milak, the alternate contact, provided the inspection documents, answered my questions and gave me a tour of the production facility.* |  |  |  |  |
| **3.** | **Is the Responsible Official/Authorized Representative still: Andy Whitney?** | *[x]*  | Yes | *[ ]*  | No |
|  | ***C****omments:* **The Responsible Official/Authorized Representative’s e-mail is: not available** |
| **4.** | **Is the facility contact still:** Craig A. Pethé**?** | *[x]*  | Yes | *[ ]*  | No |
|  | ***C****omments:* **The facility contact’s e-mail is: Craig\_A\_Pethe'@raytheon.com**  |

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| **IN** | **MNC** | **SNC** | **B. Specific Conditions:**  |
| **✓****✓****✓****✓****✓****✓****✓****✓****✓****✓****✓****✓****✓** |  |  | *Inspection note: This permit became effective on 5/25/10. The permit is a renewal that partially incorporates 1030447-029-AC. The construction permit remains effective***General Conditions [**62-4.160, F.A.C.]12. This permit or a copy thereof shall be kept at the work site of the permitted activity.***Comments****: A copy of the permit [x]  was kept at the worksite.*8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:* 1. A description of and cause of noncompliance; and
	2. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

***Comments****: There were no non-compliance events per Mr. Milak.***Common Conditions** [Rule 62-296.320(4)(c), F.A.C.]Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.**Emissions and Controls**2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]***Comments****: There are no VOC Emission Controls at this facility. The Spray Booths had overspray filters installed.*6. VOC or OS Emissions: No person shall 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. [Rule 62-296.320(1), F.A.C.]***Comments****: All containers were properly labeled, and sealed when not in use. Desktop solvents were dispensed from containers that always remain sealed.*7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An “objectionable odor” means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]***Comments:*** *An upwind/downwind survey of the facility was conducted. The observed parameters were:**Downwind odor level detected- None; Wind direction – NW to SE Upwind odor level detected-None.*9. Unconfined Particulate Emissions: 1. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
2. Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
3. Reasonable precautions include the following:
4. Paving and maintenance of roads, parking areas and yards.
5. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
6. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
7. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
8. Landscaping or planting of vegetation.
9. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
10. Confining abrasive blasting where possible.
11. Enclosure or covering of conveyor systems.

A.5. Unconfined Emissions of Particulate Matter (PM): Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the use of panel filter systems to control paint booth overspray emissions.[Rules 62-296.320(4)(c) and 62-4.070(3), F.A.C.; Construction Permit 1030447-001-AC]***Comments****: There were no unconfined particulate emissions or fugitive dust emanating from this facility.***Administrative Requirements**7 Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority. [Rule 62-210.370(3), F.A.C.] ***Comments:*** *The annual operating report for calendar year 2010 was submitted on 3/8/2011.*8 Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to PCDEM (Compliance Authority) no later than 60 days prior to the expiration date of the operation permit. [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.] ***Comments:*** *The permit expires on 4/24/15. An application is required to be submitted no later than 2/23/15.* A.2. Volatile Organic Compound (VOC), Total Hazardous Air Pollutants (HAPs) and Individual HAP Emission Limits: As requested by the permittee and in order to operate the facility as a Synthetic Non-Title V source of VOC and HAP emissions, the following emission limits shall apply facility- wide:

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| Pollutant | Tons/consecutive 12-month period |
| Total VOC emissions | 32.0 |
| Total HAP emissions | 17.2 |
| Individual HAP emissions | 9.5 |

 [Rule 62-210.200(PTE), F.A.C.; Construction Permit 1030447-001-AC]***Comments****:* Total VOC emissions Tons/consecutive 12-month period**:**  3**.**4825Total HAPS emissions Tons/consecutive 12-month period**:** 0**.**63A.3. VOC/Organic Solvents (OS) Emissions: 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. The facility shall comply with the following:1. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials.
2. All VOC/OS from washings (equipment clean-up) shall be directed into containers that prevent evaporation into the atmosphere.
3. Tightly cover or close all VOC containers when they are not in use.
4. Prevent excessive air turbulence across exposed VOCs.
5. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.; Construction Permit 1030447-001-AC]***Comments:*** *There are no VOC emission Control devices at this facility. All equipment, pipes, hoses, lids, fittings, etc. were operated & maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials. All VOC/OS from washings (equipment clean-up) were directed into containers that prevent evaporation into the atmosphere. All VOC containers were covered or closed when they were not in use. There were no VOCs exposed to air. There were no spills at the time of my visit.*A.4. Objectionable Odors: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.*{Permitting Note: If the Department and/or Pinellas County Department of Environmental Management (PCDEM) receives a valid odor complaint, the Department and/or PCDEM reserves the right to require that odor control measures/work practices be implemented.}*[Rule 62-296.320(2), F.A.C. and Pinellas County Code, Section 58-178]***Comments****: There were no Objectionable odors inside or outside of the facility property at Raytheon.*A.6. Fugitive Emissions Opacity Standard: In order to provide reasonable assurance the panel filter systems are adequately controlling emissions of unconfined particulate matter, visible emissions from the paint spray booths should not exceed 5 percent opacity. Exceedance of the 5% limit shall not be considered a violation in and of itself, but an indication that additional control precautions and/or practices may be necessary. [Rule 62-4.070(3), F.A.C.; Construction Permit 1030447-001-AC]***Comments****: The spray booths had overspray filters on the exhausts and there were no emissions associated with the spray painting activities.*A.8. VOC/HAP Recordkeeping: A log shall be maintained to document compliance with Specific Condition No. A.2. At a minimum, the log shall identify and quantify each paint, coating, thinner, solvent, and other material used in the electronic communications equipment manufacturing operations, including all solvent metal cleaning, that contain VOCs and/or HAPs. Documentation of solvents consumed from activities such as paint gun/hose cleanup may use a mass-balance method to determine usage (amount used minus amount collected for disposal or recycle).  The permittee shall record and calculate, at a minimum, the following: Monthly (log by the 21st operating day of the next month)1. Facility Name, Date (Month /Year), Facility ID No. (1030447), and E.U. ID Nos.;2. Monthly usage of each paint, coating, thinner, solvent, and other material which contain VOCs and/or HAPs (gallons);3. Density (lbs/gal) and VOC/HAP content (wt %) of each item in A.8.a.2.;4. Monthly total HAP and individual HAP emissions (lbs or tons);5. Monthly total VOC emissions (lbs or tons); and6. Total VOC, total HAP, and individual HAP emissions (tons) for the most recent consecutive 12-month period.If the individual HAP emissions for the most recent consecutive 12-month period exceed 80% of the major-source thresholds (i.e., 8.0 tons), the records required in Specific Condition A.8.a.1. – 4. shall be kept on a daily basis. The permittee shall use this information to ensure that the individual HAP emissions for the upcoming, consecutive 12-month period do not exceed permit limitations. Should the individual HAP emissions for the consecutive, 12-month period fall below 80% of the major-source thresholds; the recordkeeping may revert to monthly.Record the date of paint spray booth filter change-outs.Supporting documentation (MSD Sheets, purchase orders, U. S. EPA "VOC DATA SHEETS”, etc.) shall be kept for each paint, coating, thinner, solvent and other material used in the painting and coating operations which includes sufficient information to determine VOC and HAP emissions. These records shall be retained on file at the facility for at least five (5) years and shall be made available to the local, state, or federal air pollution agency upon request.[Rule 62-4.070(3), F.A.C.; Construction Permit 1030447-001-AC]***Comments****: The facility was in compliance with items 1 through 6 above re: record-keeping.*  |
| **✓** |  |  | Valid Permit [Rule 62-210.300] |
| **✓** |  |  | Changes to Facility/emission unit [Rule 62-210.300] *Does the emission unit description above match what the facility is operating [x]  Yes [ ]  No* **C**omments:  |
| **✓** | **C. Other:** |
| **Pollution Prevention Activities*** P2 Handouts Provided: [x]  P2 Brochure; [ ]  P2 Manual; [ ]  P2 Checklist
* Have any emissions reductions occurred [ ]  *Yes /* [x]  *No*

[ ]  Chemical Substitution; [ ]  Equipment Changes; [ ]  Process Changes[ ]  Chemical/Material Reuse; [ ] On-site Recycling; [ ]  Other: ***Comments:*** *NA*  |
| Closing Conference: *I informed Mr. Milak that Raytheon was in compliance with applicable rules and permit conditions.* |
| **Inspector(s)**: Jose Rodriguez, *Pinellas County, Air Quality Division* |
| **Signature(s)**: Date: | **Date: 1 December 2011** |
| ACCESS? | **✓** | EASIIR? | **✓** |