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|  1030447 80701 |  |
|  **FACILITY:** **Raytheon Company** |  **PERMIT ID: 1633** |
|  **C3I Manufacturing** |  **DISTRICT:** Southwest |
|  **ADDRESS:** 7887 Bryan Dairy Road | **CONTACT PHONE:**  |
|  Largo, FL | 727-302-4793 |
|  **ARMS NO:****1030447 002** | **PERMIT NO:** | **Expiration Date:** 5/24/15**Renewal Date:** 2/23/15 |
|  | **1030447-004-AO** |  |
|  |  | **Test Due Date:** NA  |
| **EMISSION UNIT DESCRIPTION :** **Non-Halogenated Solvent Metal Cleaning** |
| **INSPECTION DATE:** | **ARMS INSPECTION TYPE:** | **COMPLIANCE STATUS:** |
|  |
|  | **1 December 2011** |  |  | INS**1** | **✓** | **INS2** |  | INS**3** |  | FUI | **✓** | **IN** |  | MNC |  | SNC |
|  |
|  |
| **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:**  |
| **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.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.7. Solvent Metal Cleaning: The non-halogenated solvent metal cleaners (EU No. 002) shall comply with the following requirements:1. Equip each cleaner with a cover. The cover shall be designed such that it can be operated easily with one hand if:

1. The solvent volatility is greater than 0.3 pounds per square inch (15 millimeters of mercury or 2 kilopascals) measured at 100 degrees F (38 degrees C);2. The solvent is agitated; 3. The solvent is heated.1. Equip the cleaner with a facility for draining cleaned parts. The drainage facility
2. shall be constructed internally such that parts are enclosed under the cover while draining if the solvent volatility is greater than 0.6 pounds per square inch (31 millimeters of mercury or 4.1 kilopascals) measured at 100 degrees Fahrenheit (38 degrees Celsius), except that the drainage facility may be external for the applications where an internal type cannot fit into the cleaning system.
3. Install one of the following control devices if the solvent volatility is greater than 0.6 pounds per square inch (31 millimeters of mercury or 4.1 kilopascals) measured at 100 degrees Fahrenheit (38 degrees Celsius), or if the solvent is heated above 120 degrees Fahrenheit (50 degrees Celsius):

1. Freeboard that gives a freeboard ratio greater than or equal to 0.7; or,2. Water cover (solvent must be insoluble in and heavier than water); or,3. Other systems of equivalent control such as refrigerated chiller or carbon absorption.1. Provided a permanent, conspicuous label summarizing the operating requirements.
2. Store waste solvent only in covered containers, and do not dispose of waste solvent or transfer it to another party in such manner that greater than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.
3. Close the cover whenever parts are not being handled in the cleaner.
4. Drain the cleaned parts for at least 15 seconds or until dripping ceases.
5. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower type spray) at a pressure which does not cause excessive splashing.

[Rule 62‑296.511(2), F.A.C.; Construction Permit 1030447-001-AC]A.9. Solvent Metal Cleaning: The permittee shall maintain daily records of operations for the solvent metal cleaning operations. The records shall be updated by the next operating day and include, but not be limited to, the following:1. Date;
2. The applicable rule number (i.e., Rule 62-296.511(2), F.A.C.); and
3. The amount and type of cleaning solvent, including exempt compounds, used in the solvent metal cleaning equipment and the VOC content of each.

[Rules 62-4.070(3) and 62-296.500(2)(b)1., F.A.C.; Construction Permit 1030447-001-AC]***Comments****: The non-halogenated metal solvent cleaner is no longer in use. There is a small amount of* *Solvent used for hand wiping at table tops.*  |
| ✓ |  |  | 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? | ✓ |