**CERTIFIED – RETURN RECEIPT**

Mr. Richard T. McCreary
Vice President and General Manager
BAE Systems Southeast Shipyards
8500 Hecksher Drive
Jacksonville, FL 32226

**Re: Duval County Air Pollution**
**BAE Systems Southeast Shipyards**
**Title V Air Operation Permit Renewal**
**PROPOSED Permit No.: 0310258-011-AV**
**Renewal of Title V Air Operation Permit No.: 0310258-009-AV**

Dear Mr. McCreary:

One copy of the "PROPOSED DETERMINATION" for the Title V Air Operation Permit Renewal for BAE Systems Southeast Shipyards, located at 8500 Heckser Drive, Jacksonville, Duval County, Florida 32226, is enclosed. This letter is only a courtesy to inform you that the REVISED DRAFT Permit has become a PROPOSED Permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

http://www.dep.state.fl.us/air/emission/apds/default.asp

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED Permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED Permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the Permitting Authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Mr. Harry D. Smith at (904) 255-7196.

Sincerely,

_____
Richard L. Robinson, P.E., Manager
Air Pollution Source Permitting Section

RLR/HDS

Enclosures

## CERTIFICATE OF SERVICE

The undersigned duly designated Permitting Authority clerk hereby certifies that this PROPOSED TITLE V AIR OPERATION PERMIT (including the PROPOSED PERMIT DETERMINATION) and all copies were sent by certified mail before the close of business on _____ to the person(s) listed

**Mr. Richard T. McCreary**
**Vice President and General Manager**
**BAE Systems Southeast Shipyards**

In addition, the undersigned duly designated Permitting Authority clerk hereby certifies that notification of access to this PROPOSED TITLE V AIR OPERATION PERMIT (including the PROPOSED DETERMINATION) was sent by E-mail to the person(s) listed:

Mr. Wayne S. Holt, BAE Systems Southeast Shipyards (wayne.holt@baesystems.com)
Mr. David A. Buff, P.E., Golder Associates Inc. (dbuff@golder.com)
**Ms. Barbara Friday, BAR [barbara.friday@dep.state.fl.us] (for posting with Region 4, U.S. EPA)**
Ms. Rita Felton-Smith, FDEP, Northeast District (E-mail)

## FILING AND ACKNOWLEDGMENT

**FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated Permitting Authority Clerk, receipt of which is hereby acknowledged.

_____ _____
(Clerk) (Date)

# PROPOSED PERMIT DETERMINATION

**Mr. Richard T. McCreary**
**Vice President and General Manager**
**BAE Systems Southeast Shipyards**
**PROPOSED Permit No.: 0310258-011-AV**
**Renewal of Title V Air Operation Permit No.: 0310258-009-AV**


## I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to BAE Systems Southeast Shipyards, located at 8500 Hecksher Drive, Jacksonville, Duval County, Florida 32226, was clerked on May 16, 2012. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the Florida Times Union on May 16, 2012. The REVISED DRAFT Permit was available for public inspection at the Neighborhoods Department, Environmental Quality Division in Jacksonville, FL 32202. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT " was received on June 4, 2012.

## II. Public Comment(s).

Comments were received and the DRAFT Permit was changed. The comments were considered to be significant enough to warrant the issuance of a REVISED DRAFT Permit. Comments were received from one respondent (the applicant) during the 30 (thirty) day public comment period. Listed below are the comment emails and a response to each comment in the order that the comments were received. The comment(s) will not be restated. When duplicative comments exist, the original response is referenced.

**A. Comment:** **Email from Mr. Wayne Holt, Environmental Manager, BAE Systems Southeast Shipyards received on April 17, 2012.**

**1. Response:** As a result of this request, the following changes were made to the DRAFT permit:

**Specific Condition No. 8** under **Section III. Emissions Unit(s) and Conditions, Test Methods and Procedures, Emission Unit Nos. 018 and 020** has been deleted.

**Specific Condition No. 7** under **Section III. Emissions Unit(s) and Conditions, Test Methods and Procedures, Emission Unit Nos. 018 and 020** has been changed:

**From:** Certification of VOC content for each batch of as-supplied coating shall be documented in accordance with Appendix A to Subpart II of Part 63 - VOC Data Sheet, or alternate format, provided the form includes all required data. This form may be submitted for demonstration of compliance with approval by the Permitting Authority.

**To:** Batch formulation data may be used as a test method in lieu of Method 24 of Appendix A to 40 CFR Part 60, to certify the as-supplied VOC content of a coating if the manufacturer or the owner or operator has determined that batch formulation data have a consistent and quantitatively known relationship to Method 24 results. Certification of VOC content for each batch of as-supplied coating shall be documented in accordance with Appendix A to Subpart II of Part 63 – VOC Data Sheet, or alternate format, provided the form includes all required data.

**B. Comment:** **Email from Mr. Wayne Holt, Environmental Manager, BAE Systems Southeast Shipyards received on April 24, 2012.**

**1. Response:** As a result of this request, the following change was made to the DRAFT Permit:

**Specific Condition No. 6** under **Section III. Emissions Unit(s) and Conditions, Test Methods and Procedures, Emission Unit Nos. 018 and 020** has been changed:

**From:** Testing for demonstration of compliance shall be performed in accordance with EPA Reference Method (RM) 24 (as described in 40 CFR 60, Appendix A) for VOC.

**To:** For each batch of coating received by the permittee, demonstration of compliance shall be determined by using the procedures in 63.785(a) or (b). The permittee may test each batch of coating, may use a certification supplied by the manufacturer for the batch, or may use any combination of three compliance procedure options described in 63.785(c)(1) through (c)(4). See Appendix CP for a flow diagram of the compliance procedure options.

**Note: Appendix CP was created for this Specific Condition**

**C. Comment: Email from Mr. Wayne Holt, Environmental Manager, BAE Systems Southeast Shipyards received on May 10, 2012.**

**1. Response:** As a result of this request, the following change was made to the DRAFT Permit:

**Specific Condition No. 4** under **Section III. Emissions Unit(s) and Conditions, Emission Limitations and Standards, Emission Unit Nos. 017** has been changed:

**From:** VE from grit blasting of internal ship surfaces (including but not limited to, tanks and holds) shall be less than 20% opacity. If (in order to comply with this limit) PM control device(s) are necessary, PM collected shall not be discharged into waters of the State without obtaining all required local, State, and Federal permits.

**To:** VE from grit blasting of internal ship surfaces (including but not limited to, tanks and holds) shall be less than 20% opacity. If needed to comply with the 20% opacity limit, PM control device(s) shall be used. The opacity limit from grit blasting of internal ship surfaces shall be applicable to PM emissions venting to the atmosphere. PM collected shall not be discharged into waters of the State without obtaining all required local, State, and Federal permits.

## III. Conclusion.

The Permitting Authority hereby issues the PROPOSED Permit, with the changes noted above.