L3 Communications Integrated Systems L.P.
Facility ID No.: 0910084
Okaloosa County

Air Operation Permit
Permit No.: 0910084-007-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, FL 32502-5740
Telephone: 850/595-8300
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[Electronic file name: 0910084-007-AO.doc]

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Table of Contents

Section	Page Number
Placard Page	1
I. Facility Information	2
A. Facility Description.	
B. Summary of Emissions Unit ID No(s). and Brief Description(s).	
C. Relevant Documents.	
II. Facility-wide Conditions	3
III. Emissions Unit(s) and Conditions	
A. EU 001 - Manufacturing Operations	5

Appendices:
- Appendix G-1, General Conditions
- Appendix E - List of Exempt Emission Units and/or Activities
- Appendix 40 CFR 63 HHHHHH
- Appendix 40 CFR 63 WWWWWW

Florida Department of
Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Permittee:
L3 Communications Integrated Systems L.P.

Permit No.: 0910084-007-AO
Facility ID No.: 0910084
SIC No(s).: 37, 3728
Project: Air Operation Permit Renewal

This renewal permit is for the operation of the L3 Communications Integrated Systems L.P. facility located at 5486 Fairchild Road, Crestview, Okaloosa County; UTM Coordinates: Zone 16, 5465.00 km East and 34040.00 km North; Latitude: 30° 46' 08" North and Longitude: 86° 30' 53" West.

STATEMENT OF BASIS: This 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, and 62-210. 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.

Effective Date: September 23, 2011
Renewal Application Due Date: July 25, 2016
Expiration Date: September 23, 2016

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

/s/

Rick Bradburn
Air Program Administrator

RB/rp/c

Section I. Facility Information

This is a renewal of permit 0910084-005-AO, issued September 1, 2006, and incorporates permit 0910084-006-AC, issued February 1, 2010.

Subsection A. Facility Description

This facility performs work involved in the fabrication and finish treatment of metal parts as well as other work related to aircraft modification and repair. Activities include forming and machining of metal parts used in the aerospace industry; surface treatment (degreasing, acid/alkaline wash, anodizing and heat treating) of metal parts, grit blasting operations, and the application of primer and topcoat finishes to metal parts. Surface coating work is performed in Paint Booth #3 (manufactured by IHEI) and includes a natural gas fueled drying booth, which is located in Building 16, and Hangar #4, which consists of a large warehouse sized paint booth for aircraft paint removal (chemical stripping) and aircraft surface coating.

Also included in this permit are miscellaneous exempt emissions units and/or activities: Boric/Sulfuric Acid anodizing tank, miscellaneous solvent use, lubrication oils, cleaners and other solvent-containing materials used throughout the facility in support of aircraft modification, and maintenance and parts fabrication activities. Additional exempt emissions units are listed on Appendix E.

Facility-wide emission limits were established by permit 0910084-002-AC for hazardous air pollutants (HAP) and volatile organic compounds (VOC) at the request of the applicant in order to remain a minor source of emissions. The facility is a natural minor source for NO_X, CO, SO_2 and PM emissions.

Permittee requested adding the requirements of 40 CFR 63 Subparts HHHHHH – Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources and WWWWWW – Plating and Polishing Operations, in 0910084-006-AC. These have not been adopted and incorporated by reference in Rule 62-204.800(11), F.A.C., by the Department as of the effective date of this permit.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the permit application received July 11, 2011, this facility is not a major source of HAP.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s)

E.U. ID No.	Brief Description
001	Manufacturing Operations

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:
Permit Application received July 11, 2011

Section II. Facility-wide Conditions

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. Permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C., and permit 0910082-002-AC]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C., and permit 0910084-002-AC]

4. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

5. An Annual Operating Report for Air Pollutant Emitting Facility, DEP Form 62-210.900(5), shall be submitted for each year by April 1 of the following year. A copy of the form and instructions may be obtained from the Department's Northwest District office or electronically at http://www.dep.state.fl.us/air/rules/forms/aor.htm. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office. [Rule 62-210.370(3)(c), F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. 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. No devices or systems are deemed necessary. [Rule 62-296.320(1), F.A.C.]

7. 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. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: confinement of PM generating activities within manufacturing building, hanger or booth. [Rule 62-296.320(4)(c), F.A.C., and permit 0910084-002-AC]

8. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District Office of the Department. [Rule 62-4.090, F.A.C.]

9. Permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District Office:

Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300; Fax: 850/595-8096

Notification of compliance testing may be submitted by electronic mail to nwdair@dep.state.fl.us.

10. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-0578, day or night, and for emergencies involving a significant threat to human health or the environment is 800/320-0519. For routine business, telephone 850/595-8300, then press 3, during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

11. Permit 0910084-002-AC established facility-wide maximum allowable limits in order to remain a minor source of air emissions. (These limits were requested by Permittee in the construction permit application and are federally enforceable limits.)

Pollutant	Maximum Allowable Limit
VOC	49.9 tons/year
HAP	9.9 (single HAP)/24.9 (total HAP) tons/year

[Rules 62-4.0707 & 62-210.200(164), F.A.C. and permit 0910084-002-AC]

12. Permittee shall maintain complete record keeping for activities that contribute to the generation of VOC and HAP emissions. Supporting information such as MSDS and product information sheets necessary to quantify the emissions for VOC and HAP shall be retained as part of the record keeping. This information shall be maintained for a period of five years. If the emissions levels for VOC and HAP are at or below 75% of their respective maximum allowable annual limits, Permittee may elect to calculate quarterly the total facility quantities, each, of VOC and HAP emissions. This information shall be available no later than the last working day of the month following the end of each calendar year quarter, and shall be made available for inspection upon request by the Department. The information shall be cumulative until the end of the year. Immediately following the end of each calendar year, the quantity of emissions shall be reset to zero and an accounting of the cumulative total recommenced. Following a quarter in which any of the emissions exceed 75% of their annual limits for VOC or HAP, Permittee shall revert to monthly calculations (information to be available no later than the last working day of the next month). If Permittee has good reason to believe that emissions will exceed the 75% threshold, he should immediately revert to monthly calculations. As in the case for quarterly estimates, the information shall be cumulative until the end of the calendar year, after which the quantity will be reset to zero and a cumulative total recommenced. [Rules 62-4.210(2) and 62-213.420(3)(c)3, F.A.C., and permit 0910084-002-AC]

13. Exempt Emissions Units and/or Activities. Appendix E, List of Exempt Emissions Units and/or Activities, is a part of this permit. [Rules 62-210.300 and 62-4.040(1)(b), F.A.C.]

Section III. Emissions Unit(s) and Conditions

Subsection A. This section addresses the following emissions unit.

EU I.D. No.	**Brief Description**
001	Manufacturing Operations

This emissions unit groups the following activities:

Metal Working Operations: Manufacturing and machining activities to fabricate metal parts, including sheet metal cutting, routing, pressing, forming, drilling, grinding, de-burring, de-rusting, sanding and cleaning.

Ballistic Foam Preparation: Production of small quantities of foam and ballistic foam for use in fabricating certain aerospace parts requiring this protective covering.

Blasting Operations: Rust is removed off steel parts using sandblasting equipment. Sodium bicarbonate may also be used as an alternate blast media.

Metal Surface Treating/Finishing Operations (Process Shop): Metal parts receive surface treatment to achieve proper hardness, corrosion resistance, and/or adhesion qualities. Activities include dipping parts in a series of tanks containing treatment solutions. Capture hoods serving various dip tanks are exhausted through one of two stacks. Several wall fans are used for general building ventilation. Metal surface treating finishing operations are subject to 40 CFR 63 Subpart WWWWWW.

Surface Coating Operations: Surface coating of manufactured or reworked metal aircraft parts using various primers and topcoat finish materials is generally done in one of several surface coating booths listed in the table below. Paint Booth 3, located in Building 16, includes a drying booth with two identical 4.05 million Btu per hour natural gas fired heaters used to dry the surface coated parts. Surface coating of aircraft or portions thereof, is done in Hangar 4. Surface coating operations are subject to 40 CFR 63 Subpart HHHHHH.

SURFACE COATING BOOTH	HANGAR/BLDG	AREA OF HANGAR/BLDG	EMISSIONS POINT
Booth #3 with Drying Booth	Bldg 16	Paint Shop	Emission Points 1 & 2
Aircraft Hangar-strip/coat	Hangar 4	Hangar	Emission Points 4 - 9
Booth #6	Bldg 16	Paint Shop	Emission Point 3
Booth #7	Bldg 15	CH-47 Touchup	Emission Point 10
Portable Booth #8	Hangar 5	CH-130 (Polish 5)	No EP – recirculated
Booth #9	Hangar 1	UH-1Y Touchup	Emission Point 11

Aircraft Paint Removal Operations: Paint removal may be required to prepare aircraft exterior surfaces prior to surface coating. These operations may require both sanding and chemical stripping. This work may be done at various locations within the facility including, but not limited to, Hangar 4. No controls for air emissions are required for this work.

Facility-Wide Fugitives: Various solvents and solvent-based materials used in aircraft maintenance and modification that is conducted throughout the facility are grouped together.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity: This permit does not impose any maximum allowable operating limits on the production capacity of this emissions unit. Record keeping will be used to verify that the facility-wide annual caps for VOC and HAP are not exceeded. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and permit 0910084-002-AC]

A.2. Hours of Operation: This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.3. Control Equipment: The particulate matter arrestor filters serving the surface coating operations conducted in Hanger #4 and Paint Booth #3, shall be operated during all surface coating activities and maintained in a manner sufficient to control emissions. The Boric Sulfuric Anodizing Tank shall be controlled with acid mist suppressants or equivalent methods. [Rule 62-4.070, F.A.C.]

Emission Limitations and Standards

{Permitting Notes: Maximum allowable emission limits are established at the facility level for VOC and HAP. Therefore, no limitations are established specifically for this emissions unit. This emissions unit is subject to the 20% visible emissions limitation. Although visible emissions less than 20% opacity comply with this Facility-Wide Condition, visible emissions of 5 to 15% opacity may suggest the presence of unacceptable operational problems.}

Test Methods and Procedures

A.4. Emissions tests are not required to show compliance with the standards of the Department, as long as Permittee maintains compliance with the maintenance requirements of the particulate matter arrestor filters and acid mist suppressants control equipment. If the maintenance requirements of the particulate matter arrestor filters and acid mist suppressants control equipment are not being met or the Department determines a Special Compliance Test is necessary, Permittee must conduct opacity testing, using EPA method 9 for a minimum of 30 minutes (use the exhaust with the highest emissions from the surface coating operations as the test point) which provides reasonable assurance that the source is capable of compliance at representative operating rates. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. [Rules 62-4.070, 62-297.310(7), and 62-297.400(9)(c), F.A.C.]

A.5. If testing required, the test reports shall comply with applicable portions of Rule 62-297.310(8), F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7)(b), F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310 and 62-297.620(1), F.A.C.]

A.6. If testing required, testing of emissions shall be conducted with the source operating at representative operating rates. Prior to testing, Permittee shall determine what constitutes typical representative operating rates for the paint booth and the aircraft surface coating activity in terms of total paint flow rates. These paint flow rates shall be used during the testing and shall be indicated on the test results submitted to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

40 CFR 63 Requirements

A.7. This emissions unit shall comply with all applicable requirements of 40 CFR 63 subpart HHHHHH – National Emissions Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Permittee requested the addition of these requirements in 0910084-006-AC. These Federal regulations have not been adopted and incorporated by reference in Rule 62-204.800(11), F.A.C., as of the effective date of this permit by the Florida Department of Environmental Protection. [Rules 62-4.030, 62-4.070(3), F.A.C., and permit application 0910084-006-AC, as requested by Permittee]

A.8. This emissions unit shall comply with all applicable requirements of 40 CFR 63 subpart WWWWWW, National Emissions Standards for Hazardous Air Pollutants: Plating and Polishing Operations. Permittee requested the addition of these requirements in 0910084-006-AC. These Federal regulations have not been adopted and incorporated by reference in Rule 62-204.800(11), F.A.C., by the Florida Department of Environmental Protection as of the effective date of this permit. [Rules 62-4.030, 62-4.070(3), F.A.C., and permit application 0910084-006-AC, as requested by Permittee]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. Permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow Permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by Permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. Permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this permit;
b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, Permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and
b. The period of noncompliance, including exact 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. Permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. Permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, Permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. Permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. Permittee shall comply with the following:

a. Upon request, Permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

14. When requested by the Department, Permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.