DRS Training & Control Systems, LLC
Beal Parkway Fabrication/Assembly Facility
Facility ID No.: 0910100
Okaloosa County

Federally Enforceable State Operating Permit
Permit No.: 0910100-002-AF

Permitting and Compliance Authority:
Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300
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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. EU001 Surface Coating Operations; and,	
B. EU002 Assembly Activities (POD Assembly/Assembly Activities)	7
Appendices	
Appendix G-1, General Conditions	

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:
DRS Training & Control Systems, LLC

Permit No.: 0910100-002-AF
Facility ID No.: 0910100
SIC No(s).: 3812
Project: Federally Enforceable State Operating Permit

This permit is for the Beal Parkway Fabrication/Assembly Facility located at 749 North Beal Parkway, Fort Walton Beach, Okaloosa County; UTM Coordinates: Zone 16, 534.8 km East and 3367.7 km North; Latitude: 30° 26' 28" North and Longitude: 86° 38' 16" West.

STATEMENT OF BASIS: This Federally Enforceable State Operating Permit (FESOP) 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: November 2, 2011
Renewal Application Due Date: September 3, 2016
Expiration Date: November 2, 2016

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

/s/

Rick Bradburn
Air Program Administrator

RB/dm/c

Section I. Facility Information.

This is the initial operating permit for this facility. The facility has an after-the-fact construction permit 0910100-001-AC, effective June 22, 2010.

Subsection A. Facility Description.

The DRS Training & Control Systems Beal Parkway Fabrication/Assembly Facility is engaged in the fabrication, coating and assembly/integration of a variety of specialty metal components and electronic equipment housings that are used in a variety of military/defense platform applications.

Once materials have been received and have passed incoming inspection reviews, manufacturing activities commence. The mechanical manufacturing (machine shop) operations consist of a variety of metalworking and fabricating equipment including manual and CNC machining, drill presses, broaches, lathes and metal cutting processes and equipment, consistent with a typical machine shop. A variety of aqueous and petroleum-based lubrication and cutting fluids are used to support these operations.

Fabricated components may be painted at one of two facility paint booths. The large paint spray booth or the Conveyorized Paint Spray booth may be used to coat metal cabinets, structures and components fabricated at the machine shop. Paint mixing and preparation activities for both paint spray booths and the paint prep mix room are located adjacent to the two paint booths. The paint spray booths and the paint prep mix room may generate both VOC and HAP emissions on the basis of the solvent evaporation that occurs during the use of cleaning solvents and coating at these booths. Each paint spray booth is equipped with one high volume/low pressure (HVLP) paint spray gun. Emissions from each paint spray booth are ducted via a stack. Particulate emissions are controlled by paint spray booth filtration.

A small parts engraving operation is located adjacent to the paint mixing prep room, indirect emissions of VOC and HAP may be generated here from the use of isopropyl alcohol or other cleaning solvents used during wipe-down activities conducted at the intermittently-used operation. Metal parts that are fabricated may be treated at the Chem Film or Passivation process areas to improve performance of the coatings applied on these surfaces.

The operation of a metalworking and welding shop is located immediately east of the mechanical manufacturing shop. In this shop machined and or cut metal stock (primarily aluminum) is fabricated and welded into component cabinets at a number of welding stations that are categorically exempt.

A variety of metal components and parts fabricated at the facility are marked with unique part and serial numbers. This activity is conducted at three parts marking/part stenciling workstations located adjacent to the large paint spray booth. Emissions of VOC/HAP are generated here from the use of the variety of inks and cleaning solvents used to support this process. The facility also performs bench scale assembly operations which include adhesive and sealant application, parts wipe-down using VOC/HAP-containing solvents, bench-top soldering and wire and cable harness assembly. The facility operates a rigid-foam-based packaging operation that is used to produce on-line (foam-in-place) production of polyurethane foam packages and a small woodworking shop.

The facility is classified as an area source and is subject to 40 CFR 63 NESHAPS subpart HHHHHH; XXXXXX and WWWWWW. Florida has not adopted these Federal standards as of September, 2011.

Based on the permit application received July 8, 2011, this facility is not a major source of hazardous air pollutants (HAP).

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

E.U. ID No.	Brief Description
001	Surface Coating Operations
002	Assembly Activities (POD Assembly/Assembly Activities)

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 8, 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. The 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.]

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.]

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. 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.

1. All containers used for temporary and permanent storage of VOC-containing fluids and/or HAP-containing fluids shall be tightly covered to prevent vaporization of VOC and/or HAP when not in use.
2. All equipment, pipes, hoses, lids, fittings, etc., shall be operated and maintained in such a manner as to minimize leaks, fugitive emissions, and spills of VOC and HAP materials. VOC and HAP spills shall immediately be cleaned up and properly disposed of or recycled.
3. Prevent air excess turbulences across exposed VOC.

[Rule 62-296.320(1), F.A.C. and Permit 0910100-001-AC]

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:

a) Paving and maintenance of roads, parking areas and yards.
b) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
c) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
d) 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.
e) Landscaping or planting of vegetation.
f) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
g) Enclosure or covering of conveyor systems.
h) Periodic change out of filter media according to manufacturer's recommendation at spray paint booths, where applicable.

[Rule 62-296.320(4)(c), F.A.C. and Application No. 0910100-002-AF]

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. The permittee shall submit all compliance related notifications and reports required by 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

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. Source Obligation.

(a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

(b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
001	Surface Coating Operations
002	Assembly Activities (POD Assembly/Assembly Activities)

The facility equipment consists of a machine shop and metal working equipment, two paint booths, paint mixing and preparation activities, small parts engraving equipment, three parts marking/part stenciling workstations, adhesive and sealant application including parts wipe-down and a rigid-foam-based packaging operation.

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

Essential Potential to Emit (PTE) Parameters

A.1. 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.]

Emission Limitations and Standards

A.2. The facility shall not exceed the following permit limitations:

Pollutant	Maximum Allowable Limit, tons per year
Facility Total VOC	90 (total all VOC, including HAP VOC)
Facility Single HAP	9 (any single HAP)
Facility Total HAP	22 (total all HAP)

[Rules 62-4.070 & 62-210.200 (Major Source; HAP), F.A.C., requested by Permittee to avoid Title V permitting and Permit No. 0910100-001-AC]

Test Methods and Procedures

A.3.a. Emissions tests are required to show compliance with the standards of the Department. The paint booth stacks of emissions unit 001 shall be tested to demonstrate continued compliance with the emissions standards for Visible Emissions. Such tests shall be scheduled during the federal fiscal year (October 1 to September 30) prior to each operation permit renewal. The Department shall be notified at least 15 days prior to testing to allow witnessing. The test results shall be included with the renewal application.

Pollutant	Test Method
VE	EPA Method 9

[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

A.3.b. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7) 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(7) and 62-297.620(1), F.A.C.]

Recordkeeping and Reporting Requirements

A.4. The Permittee shall install, use, and maintain appropriate systems to gather data necessary to track monthly and rolling twelve month total VOC and HAP – containing materials usage and produce a monthly total and a rolling twelve month total of VOC emissions (total all VOC, including HAP VOC), and total and individual HAP emissions. If permittee does not maintain a monthly materials inventory the Permittee shall assume that all VOC- and HAP-containing materials are used the same month as they are received and the emissions occur on the month when the materials are received. Supporting documentation including Material Safety Data Sheets, purchase orders, delivery receipts, usage logs, emissions calculations and logs, etcetera, shall be kept for a minimum of five years to verify emission summaries and shall be made available for inspection upon request by the Department to determine compliance. [Rules 62-4.160(2), 62-4.070, 62-210.200(PTE), F.A.C. and Permit No. 0910100-001-AC]

A.5 Monthly summaries of rolling twelve month total of VOC emissions (total all VOC, including HAP VOC), and total and individual HAP emissions shall be certified and signed by a responsible company representative to be an accurate and truthful representation of emissions. This information shall be available no later than the last working day of the month following the end of each calendar month, and shall be kept and made available for inspection upon request by the Department for at least five years. [Rules 62-4.070 and 62-4.210(2), F.A.C. and Permit No. 0910100-001-AC]

{Permit Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the 11 months previous to the month in question.}

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. The 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 the 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 the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the 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. The 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, 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:

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. The 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, the 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. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the 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. The 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. The permittee shall comply with the following:

a. Upon request, the 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. The 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, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the 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.