TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Northrop Grumman Systems Corporation
5000 US 1 North
St. Augustine, Florida 32095

North Complex
Facility ID No. 1090041

PROJECT

Project No. 1090041-006-AF
Application for Minor Source Air Construction Permit
FESOP Renewal

COUNTY

St. Johns, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590

March 8, 2011

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Northrop Grumman Systems Corporation is an existing Aircraft Rework and Manufacturing Facility (Standard Industrial Classification No. 3711). The facility is located in St. Johns County at 495 Hawkeye View Lane off Gun Club Road, St. Augustine, in St. Johns County, Florida.

The UTM coordinates of the existing facility are Zone 17, 467.4 km East, and 3314.4 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

Renewal of the Federally Enforceable State Operating Permit.

Processing Schedule

2/2/2011 Received the application for a minor source air pollution construction permit.

2. APPLICATION REVIEW

Discussion of Emissions

Emissions Unit (EU) #001 - Aircraft Rework & Mfg Facility:

ID	Materials	RATE	POLLUTANT	Emissions Limit LBS/HR	TPY	FAC RULE	TEST METHOD
EU 001	Materials containing VOC[1]	---	VOC	---	10.0[2]	62-210.200(130)	---[3]
			HAP[4]	---	5.0[5]	62-210.200(130)	---[3]
			HAPs[6]	---	5.0[7]	62-210.200(130)	---[3]
			Odor	---[8]	---	62-296.320(2)	

[1]VOC - Volatile Organic Compounds

[2]Basis: Requested facility cap for all VOCs.

[3]**Compliance** shall be determined by recording all of the data for materials containing HAPs and VOCs that are required to determine the emissions of each HAP, total HAPs and total VOCs (C.A.S. NAME, INV., UNIT, CONV FCTR., GAL, LBS/GAL, WGT/VOL, COMP. %, EMISSIONS in LB with TPY at end of year and include a LEGEND) and **submitting this data as a compliance report with the AOR**.

[4]HAP - Hazardous Air Pollutant

[5]Basis: Requested cap for each HAP.

[6]HAPs - more than one HAP.

Sources of fugitive emissions are listed in Table GN-FE-5 (copy attached).

State Requirements

This emissions unit is subject to the requirements of Rule 62-210.320, F.A.C.

Federal Requirements

Northrop Grumman Systems Corporation may be subject to Area Source MACT 40 CFR Part 63 HHHHHH -National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing, upon adoption by reference into the Florida Administrative Code Rule, upon adoption by reference into the Florida Administrative Code Rule.

3. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit Leslie maybin is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Northeast District Office, Florida Department of Environmental Protection (Department) 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590.