



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

July 21, 1997

Mr. James B. Hilf  
Litton Laser Systems  
2787 South Orange Blossom Trail  
Apopka, Florida 32703

Re: Facility No.: 0571152

Dear Mr. Hilf:

The Department has received the Title V General Permit Notification Form for the dry cleaning facility that you submitted on June 2, 1997.

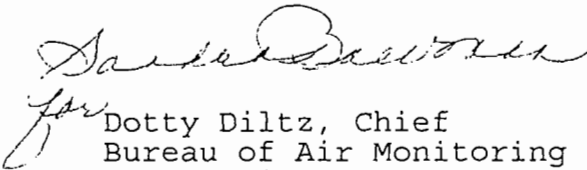
Please note that in January of each year the Department will be mailing fee notices to those facilities using the Title V general permit. This annual operation fee is \$50 and it is due and payable between January 15 and March 1 of each year the facility is in operation and is subject to the requirements of the Title V general permit.

If you have or expect to have any changes in your mailing address, location address, responsible official, or phone number, please notify the Department at the following address:

Title V General Permits Office  
Bureau of Air Monitoring and Mobile Sources MS 5510  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Fl 32399-2400

If there are any changes in the facility status, including change of operating parameters or equipment, or if you have any additional questions regarding the Title V General Permit Program, please contact the District or local air program compliance inspector in your area.

Sincerely,

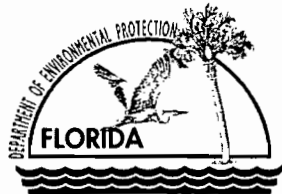
  
Dotty Diltz, Chief  
Bureau of Air Monitoring  
and Mobile Sources

DD/jw

cc: Ms. Marie Driscole, Orange County

# 0571152

Litton Laser Systems  
Orlando



6/26/97 spoke to James Kelf and he is the  
facility manager.

p17

1. add Inc. for corporation.
6. add title for responsible official

p18

3(b) Choose only one. Mark out and  
initial one not chosen.

p19

4(b)(c)(g)(h)(i) should be marked

p20

Sign and date acknowledging changes

# Halogenated Solvent Degreasers Facility Notification

## Facility Name and Location

1. Facility Owner/Company Name (Name of corporation, agency, or individual owner): Litton Laser Systems
2. Site Name (For example, plant name or number): Litton Laser Systems - Orlando
3. Hazardous Waste Generator Identification Number: 980845820
4. Facility Location: Street Address: 2787 S. Orange Blossom Trail City: Apopka County: Orange Zip Code: 32703
5. Facility Identification Number (DEP Use): <i>05M152</i>

## Responsible Official

6. Name and Title of Responsible Official: James B. Hilf
7. Responsible Official Mailing Address: Organization/Firm: Litton Laser Systems Street Address: 2787 S. Orange Blossom Trail City: Apopka County: Orange Zip Code: 32703
8. Responsible Official Telephone Number: Telephone: ( 407 ) 297 - 4625 Fax: ( 407 ) 297 - 4895

## Facility Contact (If different from Responsible Official)

9. Name and Title of Facility Contact (For example, plant manager): Same as Responsible Official
10. Facility Contact Address: Street Address: City: County: Zip Code:
11. Facility Contact Telephone Number: Telephone: ( ) - Fax: ( ) -

**RECEIVED**

**JUN 2 1997**

Bureau of Air Monitoring  
& Mobile Sources

### Facility Information

1. Provide the information below for each machine at the facility. Indicate the type of machine, the date of its purchase, and the date the control device was installed, if applicable.

Equipment Type	ID#	Date Initially Purchased	Date Cntrl Device Installed	ID#	Date Initially Purchased	Date Cntrl Device Installed
Batch Vapor						
x < 1.21 m <sup>2</sup>	1	5/5/97	N/A	_____	_____	_____
x > 1.21 m <sup>2</sup>	_____	_____	_____	_____	_____	_____
Batch Cold	_____	_____	_____	_____	_____	_____
In-line						
New	_____	_____	_____	_____	_____	_____
Existing	_____	_____	_____	_____	_____	_____

2. (a) What was the total amount of halogenated solvents purchased in the latest 12 months?

gallons

(b) If less than 12 months, how many?  months

Check why it is less than 12 months: New owner:  New store:  Did not keep records:

3. (a) Please indicate which of the following halogenated solvents are used at your facility.

perchloroethylene

methylene chloride

trichloroethylene

1,1,1-trichloroethane

carbon tetrachloride

chloroform

(b) The total volume of halogenated solvent emissions shall not exceed 10 tons per year. I choose to meet this requirement by:

complying with an alternative solvent emission limit

implementing a control device combination/work practice standards

meeting an idling emission limit/work practice standards

meeting the requirements for batch cold cleaning machines

4. Based upon your response to 3(b), please select the appropriate control equipment combination from the list provided below. (Indicate with an "X" all options that apply to your facility.)

- 1.0 freeboard ratio
- super-heated vapor
- freeboard refrigeration device
- carbon adsorber
- dwell time
- working mode cover
- reduced room draft

#### Equipment Monitoring and Recordkeeping Information

Check all logs which are required to be kept on-site in accordance with the requirements of this general permit:

- (a) Purchase receipts for halogenated solvent purchases
- (b) Inspection records
- (c) Temperature monitoring
- (d) Idling emission concentration monitoring
- (e) Instrument calibration
- (f) Dwell time records
- (g) Solvent content records
- (h) Remedial action log
- (i) Control device monitoring
- (j) Log of solvent additions and removals
- (k) Monthly emissions calculations
- (l) Rolling 3-month average emissions calculations
- (m) Cleaning capacity calculations

**Surrender of Existing Air Permit(s)**

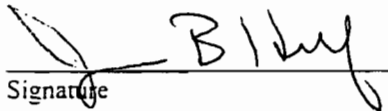
Please indicate with an "X" the appropriate selection:

- I hereby surrender all existing air permits authorizing operation of the facility indicated in this notification form; specifically, permit number(s) \_\_\_\_\_
- No air permits currently exist for the operation of the facility indicated in this notification form.

**Responsible Official Certification**

*I, the undersigned, am the responsible official, as defined in Part II of this form, of the facility addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described above so as to comply with all terms and conditions of this general permit as set forth in Part II of this notification form.*

*I will promptly notify the Department of any changes to the information contained in this notification.*

  
Signature

5/27/97  
Date

**Litton**

**Laser Systems**

P.O. Box 547300  
Orlando, Florida  
32854-7300

407-295-4010

**RECEIVED**  
SEP 3 2002  
Bureau of Air Monitoring  
& Mobile Sources

August 29, 2002

General Permits Section  
Bureau of Air Monitoring and Mobile Sources,  
MS 5510  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Surrender of Title V General Permit. AIRS ID: 0951152

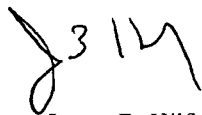
To Whom It May Concern:

Please be advised that Litton Systems Inc., Laser System Division, is no longer operating a vapor degreaser using Perchloroethylene as a solvent. We have not had this manufacturing process in operation for the past 18 months.

We misunderstood, and thought that if we did not re-new the permit application, we would automatically surrender the permit. Mr. John Parker, Environmental Specialist with the Orange County DEP, informed us that we were required to surrender the permit in writing. Please accept this letter as notice that we are surrendering our permit for operating a vapor degreaser using Perchloroethylene as a solvent.

Thank you!

Sincerely,  
Litton Systems Inc., Laser Systems Division,



James B. Hilf  
Manager of Facilities

**Litton**

**Laser Systems**

P.O. Box 547300  
Orlando, Florida  
32854-7300

407-295-4010

RECEIVED  
MAR 19 2001  
Bureau of Air Management  
& Mobile Sources

*Inactivated*

March 15, 2001

Ms. Sandra Bowman  
Title V Air Permits Office  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Change of Status - Facility #0571152

Dear Ms. Bowman:

The Laser Systems Division of Litton Systems, Inc., located at 2787 S. Orange Blossom Trail, Apopka, Florida 32703, currently operates under a Title V General Air Permit issued by the Florida Department of Environmental Protection with respect to its vapor degreasing operation. The purpose of this letter is to notify the Florida Department of Environmental Protection of an impending change in ownership of the Laser Systems Division.

The Division's parent company, Litton Industries, Inc., and Northrop Grumman Corporation have entered into an agreement and plan of merger, pursuant to which Litton Industries, Inc. will become a wholly-owned subsidiary of Northrop Grumman Corporation. The proposed change in ownership is expected to occur on or about March 30, 2001.

The merger is not expected to result in a change in the Division's operations, including those operations covered by the above-referenced Title V General Air Permit. We understand that the Laser Systems Division will be authorized to operate under the above-referenced permit after the merger and that no further action will be required. Please advise me at your earliest possible convenience if our understanding is incorrect.

If we do not hear otherwise, we will assume that no further action is required of the Laser Systems Division and that the above-referenced permit will continue to be in full force and effect after the proposed merger. We appreciate your attention to this matter.

Sincerely,  
Laser Systems Division;

James B. Hilf  
Manager of Facilities

cc: J. Palmer  
Senior Environmental, Health and Safety Counsel



**Litton**

Laser Systems

P.O. Box 547300  
Orlando, Florida  
32854-7300

407 295-4010

December 8, 1997

Ms. Sandra Bowman  
Title V General Air Permits Office  
Bureau of Air Monitoring and Mobil Sources MS 5510  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Facility # 0571152 - Initial Compliance Report

Dear Ms. Bowman:

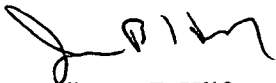
Pursuant to the requirement of our Title V exemption and your recent conversation with Mr. Raymond Nelson of our Corporate Environmental Affairs Department, attached is the data necessary for our initial compliance report as required by 40 CFR 63.468(e).

Sorry for the delay in providing this report. It was an oversight on our part.

Also, your letter of acceptance of our application dated July 21, 1997 indicated that this was a dry cleaning facility. This is not correct. Please update your records, we are a manufacturing facility.

If you have any questions, please call me at 407-297-4625.

Sincerely,  
LITTON LASER SYSTEMS DIVISION;



James B Hilf  
Facilities Lead

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**DEC 15 1997**

Bureau of Air Monitoring  
& Mobile Sources

The following information relates to NESHAP 40 CFR 63, National Emission Standards for Halogenated Solvent Cleaning, Section 40 CFR 63.468, Reporting Requirements, paragraph "e", initial statement of compliance:

40 CFR 63.468 (e) (1):

Litton Laser Systems, 2787 So OBT, Apopka, Fl., 32703

40 CFR 63.468 (e) (2):

Same as #1 above

40 CFR 63.468 (e) (3):

24 1/2" x 18 1/2", or approximately .293 square meters

40 CFR 63.468 (e) (4):

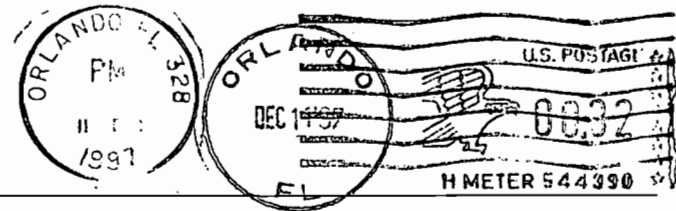
$$\frac{2 \text{ gals added}}{3 \text{ months time}} \times \frac{4405 \text{ cc}}{\text{gal}} \times \frac{1.619 \text{ g}}{\text{cc}} \times \frac{1 \text{ kg}}{1000 \text{ g}} / .293 \text{ m}^2$$

$$= 48.68 \text{ kg/m}^2/\text{month}, \text{ or approx. } \mathbf{16.23} \text{ kg/m}^2/\text{month}.$$

**Litton**

Laser Systems

P. O. Box 547300  
Orlando, Florida  
32854-7300



Ms. Sandra Bowman  
Title V General Air Permits Office  
Bureau of Air Monitoring and Mobil Sources MS 5510  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

32399/2400



**Litton**

**Laser Systems**

July 24, 1998

P.O. Box 547300  
Orlando, Florida  
32854-7300

407 295-4010

Ms. Sandra Bowman  
Title V General Air Permits Office  
Bureau of Air Monitoring and Mobil Sources MS 5510  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

*#0951152*

RE: Facility # 0571152 – Annual Report

Dear Ms. Bowman:

In accordance with 40 CFR 63.468 (f) & (g), this document shall serve as our annual report for our Perchloroethylene vapor degreaser.

**SIZE & TYPE**

24-1/2" x 18-1/2" or approximately .293 square meters.

**AVERAGE MONTHLY SOLVENT CONSUMPTION**

Average monthly solvent consumption is 3.4 kilograms/square meter/month.

**THREE MONTH ROLLING AVERAGE REPORTS**

Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
0	0	0	5.08	5.08	5.08	8.12	8.12	8.12	0	0	0

Reporting period from July of 1997 through June of 1998.

Quantities in kilograms/square meter.

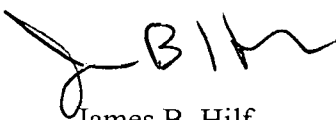
**ESTIMATED TOTAL SOLVENT CONSUMPTION**

Estimated total solvent consumption for the year = 5 gallons.

**STATEMENT OF TRAINING**

I James B. Hilf, certify by my signature below that all operators of our vapor degreaser have been trained in the proper operation of the degreaser and it's control devices and that they are capable of passing the test required in 63.463(d)(10).

Sincerely,  
LITTON LASER SYSTEMS DIVISION,



James B. Hilf  
Facilities Lead

**Litton**

Laser Systems

P. O. Box 547300  
Orlando, Florida  
32854-7300



Ms. Sandra Bowman  
Title V General Air Permits Office  
Bureau of Air Monitoring and Mobil Sources  
MS-5510  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

32399-2400



**Litton**

Laser Systems

P.O. Box 547300  
Orlando, Florida  
32854-7300

407 295-4010

RECEIVED  
AUG 24 1998  
Bureau of Air Monitoring  
& Mobile Sources

August 21, 1998

Ms. Sandra Bowman  
Title V General Air Permits Office  
Bureau of Air Monitoring and Mobil Sources MS 5510  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Facility # <sup>051152</sup>~~057~~1152 – Change of Status

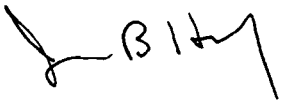
Dear Ms. Bowman:

Attached is a revised Facility Notification Form reflecting the addition of a second small perchloroethylene vapor degreaser to our facility.

We anticipate putting this degreaser into service sometime near the end of September. Pursuant to 40 CFR 63.468(e) I will provide you with an initial compliance report within 150 days of the degreaser startup date.

If you have any questions regarding this change, please call me at (407) 297-4625.

Sincerely,  
LITTON LASER SYSTEMS DIVISION,



Jim Hilf  
Facility Group Lead

# Halogenated Solvent Degreasers Facility Notification

## Facility Name and Location

1. Facility Owner/Company Name (Name of corporation, agency, or individual owner): Litton Laser Systems Division
2. Site Name (For example, plant name or number): Litton Laser Systems Division - Orlando
3. Hazardous Waste Generator Identification Number: 980845820
4. Facility Location: Street Address: 2787 South Orange Blossom Trail City: Apopka County: Orange Zip Code: 32703
5. Facility Identification Number (DEP Use): 0951158

**RECEIVED**  
AUG 24 1998  
Bureau of Air Monitoring  
& Mobile Sources

## Responsible Official

6. Name and Title of Responsible Official: James B. Hilf
7. Responsible Official Mailing Address: Organization/Firm: Litton Laser Systems Division Street Address: 2787 South Orange Blossom Trail City: Apopka County: Orange Zip Code: 32703
8. Responsible Official Telephone Number: Telephone: (407) 297-4625 Fax: (407) 297-4609

## Facility Contact (If different from Responsible Official)

9. Name and Title of Facility Contact (For example, plant manager): Same as responsible official
10. Facility Contact Address: Street Address: City: County: Zip Code:
11. Facility Contact Telephone Number: Telephone: ( ) - Fax: ( ) -

**Facility Information**

1. Provide the information below for each machine at the facility. Indicate the type of machine, the date of its purchase, and the date the control device was installed, if applicable.

Equipment Type	ID#	Date Initially Purchased	Date Cntrl Device Installed	ID#	Date Initially Purchased	Date Cntrl Device Installed
Batch Vapor						
x < 1.21 m <sup>2</sup>	1	5/5/97	N/a	2	7/24/98	N/A
x > 1.21 m <sup>2</sup>	_____	_____	_____	_____	_____	_____
Batch Cold	_____	_____	_____	_____	_____	_____
In-line						
New	_____	_____	_____	_____	_____	_____
Existing	_____	_____	_____	_____	_____	_____

2. (a) What was the total amount of halogenated solvents purchased in the latest 12 months?

[ 50 ] gallons

(b) If less than 12 months, how many? [ ] months

Check why it is less than 12 months: New owner: [ ] New store: [ ] Did not keep records: [ ]

3. (a) Please indicate which of the following halogenated solvents are used at your facility.

[ X ] perchloroethylene

[ ] methylene chloride

[ ] trichloroethylene

[ ] 1,1,1-trichloroethane

[ ] carbon tetrachloride

[ ] chloroform

(b) The total volume of halogenated solvent emissions shall not exceed 10 tons per year. I choose to meet this requirement by:

[ X ] complying with an alternative solvent emission limit

[ X ] implementing a control device combination/work practice standards

[ ] meeting an idling emission limit/work practice standards

[ ] meeting the requirements for batch cold cleaning machines



4. Based upon your response to 3(b), please select the appropriate control equipment combination from the list provided below. (Indicate with an "X" all options that apply to your facility.)

- 1.0 freeboard ratio
- super-heated vapor
- freeboard refrigeration device
- carbon adsorber
- dwell time
- working mode cover
- reduced room draft

#### Equipment Monitoring and Recordkeeping Information

Check all logs which are required to be kept on-site in accordance with the requirements of this general permit:

- (a) Purchase receipts for halogenated solvent purchases
- (b) Inspection records
- (c) Temperature monitoring
- (d) Idling emission concentration monitoring
- (e) Instrument calibration
- (f) Dwell time records
- (g) Solvent content records
- (h) Remedial action log
- (i) Control device monitoring
- (j) Log of solvent additions and removals
- (k) Monthly emissions calculations
- (l) Rolling 3-month average emissions calculations
- (m) Cleaning capacity calculations

**Surrender of Existing Air Permit(s)**

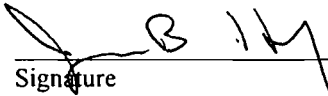
Please indicate with an "X" the appropriate selection:

- I hereby surrender all existing air permits authorizing operation of the facility indicated in this notification form; specifically, permit number(s) \_\_\_\_\_.
- No air permits currently exist for the operation of the facility indicated in this notification form.

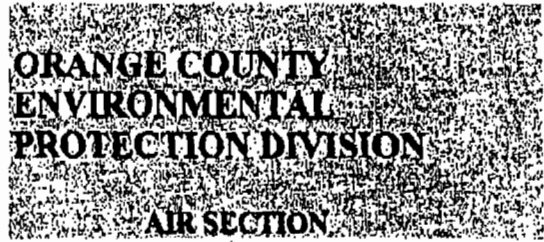
**Responsible Official Certification**

*I, the undersigned, am the responsible official, as defined in Part II of this form, of the facility addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described above so as to comply with all terms and conditions of this general permit as set forth in Part II of this notification form.*

*I will promptly notify the Department of any changes to the information contained in this notification.*

 \_\_\_\_\_  
Signature

8/21/98  
\_\_\_\_\_ Date

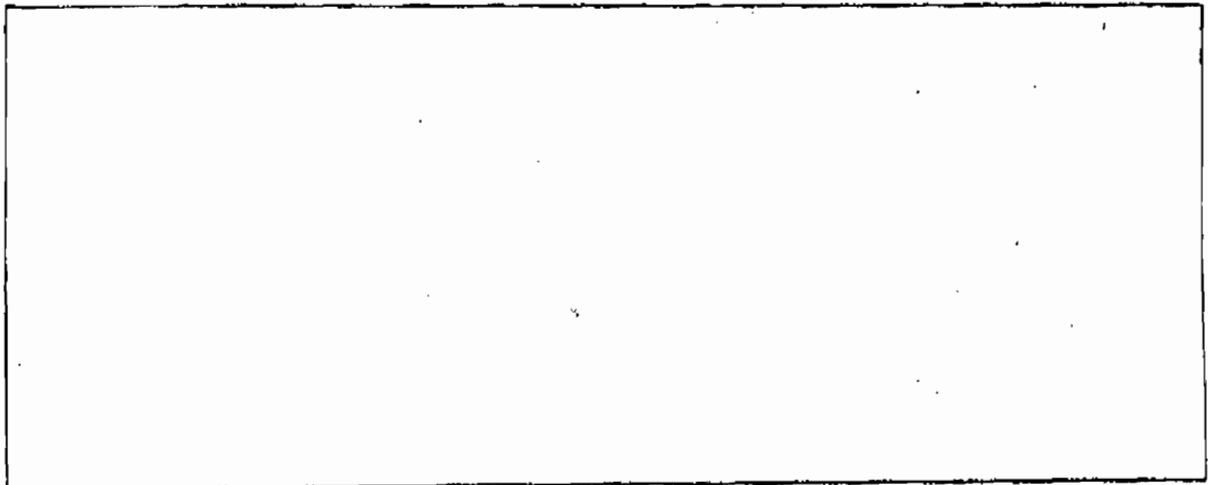


EPD, 2002 E. Michigan Street, Orlando, FL 32806, FAX (407) 898-4521

# Fax

TO: Rick Butler FROM: Ilka Bundy  
 PHONE: 407-836-9524  
 FAX: 850-922-6979 PAGES: 5  
 PHONE: 850-921-9586  
 RE: Litton Laser Systems Division (Permit)  
0951152

## MESSAGE



**Best Available Copy****Liton****Laser Systems Division**2787 South Orange Blossom Trail  
Apopka, Florida 32703

Phone: (407) 297-4825 Fax (407) 297-4608

**FAX TRANSMITTAL**

Number of pages (including this one): 4

Date: December 14, 1999

To: Ilka Bundy

From: Jim Hilf


Subject: Requested Documents

Ilka,

Attached are the documents we talked about yesterday. A letter from Boffor Associates, Consulting Engineers to the DEP And a reply letter from the DEP exempting us from permit requirements.

As I mentioned yesterday, we stopped tracking Perch. consumption and monitoring reports after receiving the letter from the DEP. If this was wrong, please let me know what we need to do and we will be glad to comply.

Thank you!

Jim Hilf  
Facilities Manager



## Best Available Copy

CONSULTING ENGINEERS — ANALYTICAL LABORATORY  
ENVIRONMENTAL  
PERMITTING • CONSULTING • TESTING

6729 Edgewater Commerce Parkway • Orlando, Florida • 32810-4278  
Toll Free 800 811-1128 Phone 407 268-0946 • Fax: 407 268-7033

March 27, 1999

Project: 1715

Alan D. Zahm, P.E.  
Section Supervisor  
Air Permitting Program  
Air Resources Management  
Florida Dept. of Environmental Protection  
3319 Maguire Blvd., Suite 232  
Orlando, FL 32803-3767

Orange County - AP  
Litton Laser Systems  
Contact - Jim Hill (407) 297-4625  
2787 S. Orange Blossom Trail  
Apopka, Florida 32703

Dear Mr. Zahm,

On March 10, 1998 Bottorf Associates, Inc. performed a walk through inspection at the above referenced facility to determine if permitting of the various small emission units would be required. This facility is mainly an assembly plant for defense type equipment such as night vision devices but also performs research and development for new technologies. Components of the products from this facility are manufactured at different facilities then shipped to this facility for assembly. This facility operates 24 hours per day and 365 days per year. It is our opinion that the entire facility is exempt from air permitting. Below we have listed the emission units with estimated emissions and/or the rule that we feel exempts them.

1. Manual grinding of glass parts with hooded exhaust. About 1 or 2 pieces per day are ground. Assuming 1 gram per piece is ground to dust and exhausted every day will result in a maximum particulate emission of 1.81 pounds per year. This is a conservative estimate. Particulate emissions are well below 5 tons per year so generically exempt by rule 62-210.300(3)(b)1, F.A.C. This operation may also be categorically exempt by rule 62-210.300(3)(a)11, F.A.C.
2. Manual Metal Machining using water based coolant with hooded exhaust. We estimate particulate emissions to be less than 10 pounds per year. Particulate emissions are well below 5 tons per year so generically exempt by rule 62-210.300(3)(b)1, F.A.C. This operation may also be categorically exempt by rule 62-210.300(3)(a)11, F.A.C.
3. Manual Touch-Up painting of metal parts and products with hooded exhaust to atmosphere. Using approximately one half of a pint per day of paint. This is equivalent to about 23 gallons per year and 114 pounds per year of VOC emissions. RACT will not apply since less than 15 pounds in any one day and less than 3 pounds in any one hour are emitted.

LITTONZAHM

## Best Available Copy

This touch-up painting operation is categorically exempt by rule 62-210.300(3)(a)23, F.A.C. since less than six gallons per day are used

4. Printed circuit board washer with exhaust to atmosphere using water and detergent for cleaning. There are essentially no quantifiable emissions from this unit. Any and all emissions are well below 5 tons per year so generically exempt by rule 62-210.300(3)(b)1, F.A.C.
5. Wave Solder Machine is categorically exempt by rule 62-210.300(3)(a)16, F.A.C.
6. Fluxing Booth used to apply flux. Flux has a paste like consistency with little to no evaporation of VOC's at ambient temperatures. VOC emissions are well below 5 tons per year so generically exempt by rule 62-210.300(3)(b)1, F.A.C. This operation may also be considered soldering equipment and categorically exempt by rule 62-210.300(3)(a)16, F.A.C.
7. Use of approximately 1.0 gallons per year of Methylene Chloride as a cleaner and exhausted through a lab hood to the atmosphere. This is equivalent to 11.1 pounds per year of emissions. Hazardous air pollutants (HAP's) are less than 1000 pounds per year so generically exempt by rule 62-210.300(3)(b)1, F.A.C.
8. Perchloroethylene Vapor Degreaser with an open top that is 24" X 18" or 3 sq. ft. and equipped with a lid. Approximately 10 gallon per year are added to this degreaser to make up for evaporation. This is equivalent to 135.1 pound per year of emissions. The vapor density of perchloroethylene is 5.83 and the vapor density of Air is 1.0 so perchloroethylene is heavier than air and this unit is categorically exempt by rule 62-210.300(3)(a)26, F.A.C.

We would appreciate your written response with the air exemption or permitting requirements for this facility. If you have any questions, please call me at 407 / 298-0848.

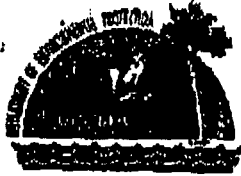
Sincerely,



Roger T. Caldwell  
Vice President  
Environmental Division

cc: Jim Hilf

LITTON.ZAHM



# Best Available Copy Department of Environmental Protection

Lawton Chiles  
Governor

Central District  
3319 Maguire Boulevard, Suite 233  
Orlando, Florida 32803-3747

Virginia B. Wetherall  
Secretary

OCD-AP-98-093

Litton Laser Systems  
2787 South Orange Blossom Trail  
Apopka, Florida 32703

Attention: Jim Hill

Orange County - AP  
Litton Laser Systems  
Permit Exemption

Dear Mr. Hill:

In response to your letter received March 30, 1998, the Department confirms that Rule 62-210.300(3)(b), P.A.C. provides an air pollution permit generic exemption for facilities that will not emit or have the potential to emit 10 tons per year of a regulated air pollutant. Based on the information provided, the referenced facility located at 2787 South Orange Blossom Trail, Apopka, Orange County, appears to qualify for this air permit exemption. Therefore no air permit is required at this time.

This source will be subject to all applicable sections of the Department's air pollution rule.

If you have questions, please call Scott Wasson at 407-891-3333 or write to the above address.

Sincerely,

L. T. Kovlov, P.E.  
Program Administrator  
Air Resources Management

DATE: 4-14-98

LTK/aw

cc: Roger T. Caldwell

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

d. The permit is conditioned such that the owner or operator is legally obligated to adhere to the terms and limitations of such permit, including any condition or limitation assumed by the owner or operator upon acceptance of such permit.

e. The permit is conditioned such that any emissions limitation, control requirement, or other requirement assumed by the owner or operator upon acceptance of such permit shall be quantifiable and enforceable as a practical matter.

2. Once a synthetic non-Title V source has been issued a federally enforceable state operation permit (FESOP), it shall remain subject to the requirements of Rule 62-210.300(2)(b), F.A.C., unless:

a. The owner or operator accepts a higher limit and the facility becomes a Title V source; or

b. The owner or operator demonstrates to the Department that it no longer needs a federally enforceable operation permit to be classified as a non-Title V source (i.e., the facility is naturally "minor" without any federally enforceable limits) and specifically requests exemption from these requirements.

3. If all of the permitted emissions units within a facility have been issued one or more air construction permits which have undergone public notice in accordance with procedures at least as stringent as those provided in Rule 62-210.350(4), F.A.C., and the applicant requests that the conditions of such construction permit(s) be transferred without material change to a federally enforceable state operation permit (FESOP), the Department shall waive the requirements of Rules 62-210.300(2)(b)1.b. and 62-210.350(4)(a)3., F.A.C., for publication of a notice of proposed agency action; provided, however, that the remaining provisions of Rule 62-210.350(4) shall apply, including the requirement that notice be given to the U.S. Environmental Protection Agency and any local air pollution control program.

4. If an applicant requests that existing, multiple air operation permits for a facility be consolidated into a single federally enforceable state operation permit (FESOP), the Department shall reduce the permit processing fee required pursuant to Rule 62-4.050, F.A.C., by an amount equal to the sum of the processing fees paid for the existing permits prorated by the number of years remaining until expiration of each such permit.

(3) Exemptions. A facility, emissions unit or pollutant-emitting activity shall be exempt from the permitting requirements of this chapter, Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C., if it satisfies the applicable criteria of Rule 62-210.300(3)(a) or (b) F.A.C., or if it has been exempted from permitting pursuant to Rule 62-4.040, F.A.C. Failure of a facility, emissions unit or activity to satisfy the exemption criteria of Rule 62-210.300(3)(a) or (b), F.A.C., does not preclude such facility, unit or activity from being considered for exemption pursuant to Rule 62-4.040, F.A.C. Emissions units and pollutant-emitting activities exempt from permitting under this rule shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered



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insignificant for Title V purposes provided they also meet the criteria of Rule 62-210.300(2)(a)1. or 62-210.430(6)(b), F.A.C. Any proposed new emissions unit or activity that would be exempt from permitting under this rule shall not be required to obtain an air construction permit pursuant to this chapter, Chapter 62-212, F.A.C., or Chapter 62-4, F.A.C., even if such unit or activity would be contained within a Title V source. (No emissions unit shall be entitled to an exemption from permitting under this rule if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.) Neither shall any emissions unit be entitled to an exemption from permitting under this rule if it would be subject to any unit-specific applicable requirement. Notwithstanding its exemption from air permitting, an exempt emissions unit or activity shall be subject to any general, facility-level applicable requirements, and its emissions shall be considered in determining the applicability of permitting requirements to other emissions units at the facility or to the facility as a whole.

(a) Categorical Exemptions.

1. One or more fossil fuel steam generators and hot water generating units located within a single facility; collectively having a total rated heat input equaling 100 million BTU per hour or less; and collectively burning annually no more than 145,000 gallons of fuel oil containing no more than 1.0 percent sulfur, or no more than 290,000 gallons of fuel oil containing no more than 0.5 percent sulfur, or an equivalent prorated amount of fuel oil if multiple fuels are used, provided none of the generators or hot water generating units is subject to the Federal Acid Rain Program or any standard or requirement under 42 U.S.C. section 7411 or 7412.

2. Any individual fossil fuel steam generator and hot water generating unit with a rated heat input equaling 100 million BTU per hour or less and burning annually no more than 150 million standard cubic feet of natural gas or no more than one million gallons of propane or no more than one million gallons of fuel oil containing no more than 0.05 percent sulfur, or an equivalent prorated amount if multiple fuels are used, provided:

a. The total annual fuel consumption for all units exempted by Rules 62-210.300(3)(a)2. and 3., F.A.C., at a facility does not exceed 375 million standard cubic feet of natural gas or 2.5 million gallons of propane or 2.5 million gallons of fuel oil containing no more than 0.05 percent sulfur, or an equivalent prorated amount if multiple fuels are used and;

b. The unit is not subject to the Federal Acid Rain Program or any standard or requirement under 42 U.S.C. section 7411 or 7412.

3. One or more fossil fuel steam generators and hot water generating units located within a single facility, collectively having a total rated heat input equaling 10 million BTU per hour or less, and fired exclusively by natural gas or propane, provided:

- 
- a. During periods of natural gas curtailment, only propane or fuel oil containing no more than 1.0 percent sulfur is fired; and
  - b. None of the generators or hot water heating units is subject to the Federal Acid Rain Program or any standard or requirement under 42 U.S.C. section 7411 or 7412.
4. Home heating and comfort heating with a gross maximum heat output of less than one million Btu per hour.
  5. Internal combustion engines in boats, aircraft and vehicles used for transportation of passengers or freight.
  6. Incinerators in one or two family dwellings or in multi-family dwellings containing four or less family units, one of which is owner-occupied.
  7. Noncommercial and nonindustrial vacuum cleaning systems used exclusively for residential housekeeping purposes.
  8. Cold storage refrigeration equipment, except for any such equipment located at a Title V source using an ozone-depleting substance regulated under 40 CFR Part 82.
  9. Vacuum pumps in laboratory operations.
  10. Equipment used for steam cleaning.
  11. Belt or drum sanders having a total sanding surface of five square feet or less and other equipment used exclusively on wood or plastics or their products having a density of 20 pounds per cubic foot or more.
  12. Equipment used exclusively for space heating, other than boilers.
  13. Noncommercial smoke houses used exclusively for smoking food products.
  14. Bakery ovens located at any retail bakery facility which derives at least fifty percent of its revenues from retail sales on premises. Also, bakery ovens located at any commercial bakery facility utilizing only non-conveyor belt ovens operating on a single baking cycle in which a determinate amount of product is cooked at one baking (i.e., batch ovens).
  15. Laboratory equipment used exclusively for chemical or physical analyses.
  16. Brazing, soldering or welding equipment.
  17. Laundry dryers, extractors, or tumblers for fabrics cleaned with only water solutions of bleach or detergents.
  18. Petroleum dry cleaning facilities with a solvent consumption of less than 3,250 gallons per year.
  19. Portable air curtain incinerators except any air curtain incinerator intended to be continuously operated at one site for more than six months or at any Department- permitted landfill for any length of time; provided:
    - a. Only land clearing debris or clean dry wood is burned;
    - b. Pit width, length, and side walls are properly maintained so that combustion of the waste within the pit is maintained at an adequate temperature and
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**Effective 2-11-99**

with sufficient air recirculation to provide enough residence time and mixing for complete combustion and control of emissions. Pit width shall not exceed twelve (12) feet, and vertical side walls shall be maintained;

c. No waste is positioned to be burned above the level of the air curtain in the pit;

d. Visible emissions do not exceed 40 percent opacity except for up to 30 minutes during periods of startup and shutdown;

e. The air curtain incinerator is located at least 300 feet away from any occupied building if it has refractory-lined walls and forced underdraft air or otherwise at least 1,000 feet away from any occupied building; and

f. The burning is ignited after 9:00 a.m. and extinguished at least one hour before sunset, except that, in the case of an air curtain incinerator with refractory-lined walls and forced underdraft air which is located at least 1,000 feet away from any off-site occupied building, the burning may commence at sunrise, and the air curtain incinerator may be charged until sunset provided it does not create a nuisance.

20. One or more emergency generators located within a single facility provided:

a. None of the emergency generators is subject to the Federal Acid Rain Program; and

b. Total fuel consumption by all such emergency generators within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.

21. One or more heating units, general purpose internal combustion engines, or other combustion devices, all of which are located within a single facility, are not listed elsewhere in Rule 62-210.300(3)(a), F.A.C., and are not pollution control devices, provided:

a. None of the heating units, general purpose internal combustion engines, or other combustion devices that would be exempted is subject to the Federal Acid Rain Program;

b. Total fuel consumption by all such heating units, general purpose internal combustion engines, and other combustion devices that would be exempted is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used; and

c. Fuel for the heating units, general purpose internal combustion engines, and other combustion devices that would be exempted is limited to natural gas, diesel fuel, gasoline and propane.

22. Fire and safety equipment.

23. Surface coating operations within a single facility if the total quantity of coatings containing greater than 5.0 percent VOCs, by volume, used is 6.0 gallons per day or less, averaged monthly, provided:

a. Such operations are not subject to a volatile organic compound Reasonably Available Control Technology (RACT) requirement of Chapter 62-296, F.A.C.; and

b. The amount of coatings used shall include any solvents and thinners used in the process including those used for cleanup.

24. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.

25. Phosphogypsum cooling ponds and inactive phosphogypsum stacks which have demonstrated compliance with the requirements of 40 CFR Part 61, Subpart R, hereby adopted and incorporated by reference.

~~26. Degreasing units using heavier-than-air vapors exclusively, except any such unit using or emitting any substance classified as a hazardous air pollutant.~~

27. Volume reduction processes as defined in Rule 62- 296.417, F.A.C., wherein the owner or operator manages only spent mercury-containing lamps removed from the facility where the volume reduction process is located.

28. Mercury recovery processes as defined in Rule 62- 296.417, F.A.C., wherein the owner or operator manages only mercury-containing devices temporarily or permanently removed from service from the owner or operator's own facilities or installations.

29. Bulk gasoline plants, provided:

a. Such operations are not conducted at a facility that is subject to the permitting requirements of Chapter 213, F.A.C., and the emissions from such operations would not contribute to total emissions that would make the facility subject to those requirements;

b. The facility receives and distributes only petroleum- based lubricants, gasoline, diesel fuel, mineral spirits and kerosene;

c. The total storage capacity for gasoline at the facility does not exceed 100,000 gallons;

d. The facility does not exceed a throughput rate (receive and distribute) of 1.3 million gallons of gasoline in any consecutive twelve-month period;

e. The facility is not subject to any Standard of Performance for New Stationary Sources (NSPS) requirement adopted by reference in Rule 62-204.800, F.A.C.; and

f. The facility is not subject to any volatile organic compound Reasonably Available Control Technology (RACT) requirement of Chapter 62-296, F.A.C.

30. Petroleum lubrication systems.

31. Application of fungicide, herbicide, or pesticide.

32. Asbestos renovation and demolition activities.

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Effective 2-11-99

33. Non-halogenated solvent storage and cleaning operations, provided the solvents contain none of the hazardous air pollutants listed at Rule 62-210.200, F.A.C.

34. Vehicle refueling operations and associated fuel storage.

35. Restaurants.

36. Burning of drugs seized by law enforcement agencies in boilers with a heat input of 250 million BTU per hour or more.

(b) Generic and Temporary Exemptions.

1. Generic Emissions Unit Exemption. An emissions unit or pollutant-emitting activity that is not entitled to a categorical exemption pursuant to Rule 62-210.300(3)(a), F.A.C., shall be exempt from the permitting requirements of this chapter, Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C., if it meets all of the following criteria:

a. It would be subject to no unit-specific applicable requirement.

b. It would neither emit nor have the potential to emit:

(i) 500 pounds per year or more of lead and lead compounds expressed as lead;

(ii) 1,000 pounds per year or more of any hazardous air pollutant;

(iii) 2,500 pounds per year or more of total hazardous air pollutants; or

(iv) 5.0 tons per year or more of any other regulated pollutant.

c. Its emissions, in combination with the emissions of other units and activities at the facility, would not cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

d. In the case of a proposed new emissions unit at an existing facility, the emissions of such unit, in combination with the emissions of any other proposed new or modified units and activities at the facility, would not result in a modification subject to the preconstruction review requirements of Rule 62-204.800(10)(d)2., 62-212.400 or 62-212.500, F.A.C.

e. In the case of a proposed new pollutant-emitting activity, such activity would not constitute a modification of any existing non-exempt emissions unit at a non-Title V source or any existing non-insignificant emissions unit at a Title V source.

2. Generic Facility Exemption. A facility that is not entitled to a categorical exemption pursuant to Rule 62-210.300(3)(a), F.A.C., shall be exempt from the permitting requirements of this chapter, Chapter 62-212, F.A.C., Chapter 62-213, F.A.C., and Chapter 62-4, F.A.C., if all of the emissions units and activities within the facility, including any proposed new emissions units and activities, meet the exemption criteria of Rule 62-210.300(3)(a), F.A.C., or Rule 62-210.300(3)(b)1., F.A.C., or if the facility meets all of the following criteria:

a. No emissions unit or pollutant-emitting activity within the facility would be subject to any unit-specific applicable requirement.

b. The facility would neither emit nor have the potential to emit:

- 
- (i) 1,000 pounds per year or more of lead and lead compounds expressed as lead;
  - (ii) 1.0 ton per year or more of any hazardous air pollutant;
  - (iii) 2.5 tons per year or more of total hazardous air pollutants;
  - (iv) 25 tons per year or more of carbon monoxide, nitrogen oxides and sulfur dioxide; or
  - (v) 10 tons per year or more of any other regulated pollutant.

c. The facility would neither emit nor have the potential to emit any pollutant in such amount as to make the facility a Title V source, nor would the facility be a Title V source for any other reason.

3. Temporary Exemption for Emissions Units at Certain Title V Sources. Except for an emissions unit that is subject to any applicable regulation or permitting requirement under Rules 62-212.400 or 62-212.500, F.A.C.; any emissions standard or other requirement adopted by reference prior to July 1, 1995, in Rule 62-204.800, F.A.C.; any requirement established pursuant to Rule 62-296.330, F.A.C.; or any Reasonably Available Control Technology (RACT) provisions under Rules 62-296.500 through 62-296.712, F.A.C.; an emissions unit that is described in a timely and complete permit application under Chapter 62-213, F.A.C., and not subject to an existing valid air permit, shall be exempt from the permitting requirements of this Chapter, Chapter 62-4, and Rule 62-212.300, F.A.C., until a final determination on a permit application under Chapter 62-213, F.A.C., is made. In addition, no emissions unit shall be exempt under this paragraph if its emissions cause or contribute to a significant emissions increase under Rule 62-212.400 or 62-212.500, F.A.C., which would trigger preconstruction review, or if it is constructed or modified, as defined under Rule 62-210.200, F.A.C., subsequent to November 23, 1994. Any applicant exercising this exemption shall provide notification of such exemption to the Department, and further authorizes the Department to inspect these emissions units at the Department's discretion. Emissions units subject to existing valid permits shall continue to operate consistent with those permits as provided under Rule 62-213.420(1)(b)2., F.A.C. This exemption is available only to emissions units contained within either facilities that were Title V sources on or before October 25, 1995, and that commenced operation on or before that date, or facilities that became Title V sources by operation of law after October 25, 1995, and have timely applied for an initial Title V air operation permit.

4. Temporary Phosphogypsum Exemption. Until permitted pursuant to Chapter 62-213, F.A.C., phosphogypsum disposal areas are exempt from the requirement to obtain an air operation permit.

(c) Conditional Exemptions from Title V Air Permitting. The following facilities are exempt from the requirement to obtain a Title V air operation permit under the provisions of Chapter 62-213, F.A.C., but are not exempt from the requirement to obtain any other air permit as may be required under this rule unless also exempt from



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

March 19, 2001

Mr. James B. Hilf  
Manager of Facilities  
Litton Laser Systems  
Post Office Box 547300  
Orlando, Florida 32854-7300

#0571152

Dear Mr. Hilf:

Thank you for your March 15 letter informing the Department of the pending merger of the Laser Systems Division's parent company, Litton Industries, Inc., and Northrop Grumman Corporation.

Rule 62-213.300(3), Florida Administrative Code (F.A.C.), states that the general permit is **non-transferable** and does not follow a change in ownership. Therefore, the enclosed Halogenated Solvent Degreasers Air General Permit Notification Form will need to be completed and submitted to the Division of Air Resource Management.

If you have any questions concerning the form or the Title V general permit program, please call Rick Butler at 850/921-9586 or me at 850/921-9583.

Sincerely,

Sandra Bowman  
Mobile Source Control Section  
Bureau of Air Monitoring  
and Mobile Sources

SB/

Enclosure

"More Protection, Less Process"

Printed on recycled paper.

Date: 05/06/1997 7:30:58 AM  
From: Sandy Bowman TAL  
Subject: ARMS change  
To: Elizabeth Walker TAL  
CC: Jim Holton TPA  
CC: Terry Knowles TAL

Elizabeth,

Please change the ARMS ID # for Litton Laser Systems  
(#0571152) from Hillsborough County to Orange County.

Thanks.

Sandy



2

Depeaser

ace

**DRY-CLEANER AIR QUALITY GENERAL PERMIT  
ANNUAL COMPLIANCE CERTIFICATION FORM**

**RECEIVED**

AIRS ID#0951152

LITTON LASER SYSTMS  
 JAMES B HILF  
 2787 S ORANGE BLOSSOM TRAIL  
 APOPKA FL 32703

JAN 29 1998

Bureau of Air Monitoring  
& Mobile Sources

Do **NOT** Remove Label

Annual Reporting Period: JULY 1, 1997 19 TO JULY 1 1998

Based on each term or condition of the Title V general air permit, my facility has remained in compliance with DEP Rule 62-213.300, Florida Administrative Code (F.A.C.), during the period covered by this statement.  YES  NO

If NO, complete the following:

#1. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from \_\_\_\_\_ to \_\_\_\_\_

Action(s) taken to achieve compliance: \_\_\_\_\_

Method used to demonstrate compliance: \_\_\_\_\_

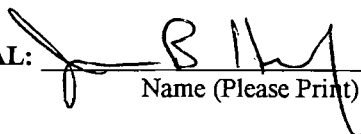
#2. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from \_\_\_\_\_ to \_\_\_\_\_

Action(s) taken to achieve compliance: \_\_\_\_\_

Method used to demonstrate compliance: \_\_\_\_\_

*As the responsible official, I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, my annual consumption of perchloroethylene solvent, based upon purchase receipts, does not exceed 2,100 gallons per year for dry-to dry facilities or 1,800 gallons per year for transfer or combination facilities.*

RESPONSIBLE OFFICIAL:  JAMES B HILF 1/13/98  
 Name (Please Print) Signature Date

\*This form is made available to you as an aid in order to meet your annual compliance certification requirements. It is at the discretion of the responsible official to use this form.

AIRS ID#: \_\_\_\_\_

*all* Revised 01/13/98

**HALOGENATED SOLVENT DEGREASERS  
AIR QUALITY GENERAL PERMIT  
ANNUAL COMPLIANCE CERTIFICATION FORM**

LITTON LASER SYSTMS JAMES B HILF 2787 S ORANGE BLOSSOM TRAIL APOPKA FL 32703	AIRS ID#0951152
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**RECEIVED**  
JAN 28 1998  
Bureau of Air Monitoring  
& Mobile Sources

Do **NOT** Remove Label

Annual Reporting Period: JULY 1 1997 TO JULY 1 1998

Based on each term or condition of the Title V general air permit, my facility has remained in compliance with DEP Rule 62-213.300, Florida Administrative Code (F.A.C.), during the period covered by this statement.  YES  NO

If NO, complete the following:

#1. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from \_\_\_\_\_ to \_\_\_\_\_

Action(s) taken to achieve compliance: \_\_\_\_\_

Method used to demonstrate compliance: \_\_\_\_\_

#2. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from \_\_\_\_\_ to \_\_\_\_\_

Action(s) taken to achieve compliance: \_\_\_\_\_

Method used to demonstrate compliance: \_\_\_\_\_

*As the responsible official, I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete.*

RESPONSIBLE OFFICIAL: JAMES B HILF *[Signature]* 1/23/98  
Name (Please Print) Signature Date

\*This form is made available to you as an aid in order to meet your annual compliance certification requirements. It is at the discretion of the responsible official to use this form.

**Litton**

Laser Systems

P.O. Box 547300  
Orlando, Florida  
32854-7300

407 295-4010

February 15, 2000

Ms. Sandra Bowman  
Title V General Air Permits Office  
Bureau of Air Monitoring and Mobile Sources MS 5510  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED  
FEB 18 2000  
Bureau of Air Monitoring  
& Mobile Sources

RE: Facility # 0571152 – Change of Status

0951152

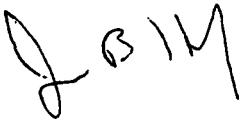
Dear Ms. Bowman:

Please be advised that our batch vapor degreaser #1 has been removed from service. This degreaser was physically removed from service on January 11, 1999, but had not been used since November of 1998. I apologize for the delay in notifying you of this change.

Batch vapor degreaser #2 continues to be in service. We will provide the annual report to Ilka Bundy of the Orange County EPA when she conducts the annual inspection on February 29, 2000.

If you have any questions regarding this change, please call me at (407) 297-4625.

Sincerely,  
LITTON LASER SYSTEMS DIVISION,

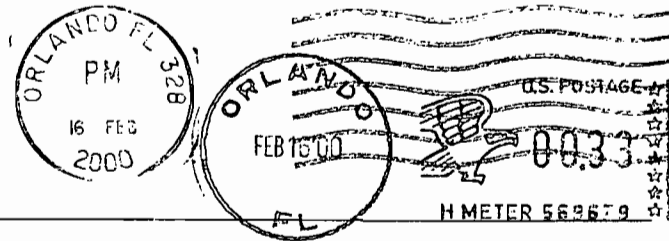


Jim Hilf  
Facility Manager

**Litton**

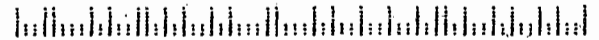
Laser Systems

P. O. Box 547300  
Orlando, Florida  
32854-7300



Ms. Sandra Bowman  
Title V General Air Permits Office  
Bureau of Air Monitoring and Mobil Sources  
MS 5510  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

32399-6542 01



ARMS  
2/29/00  
JP

**HALOGENATED SOLVENT DEGREASERS**

**TITLE V GENERAL PERMIT  
COMPLIANCE INSPECTION CHECKLIST**

TYPE OF INSPECTION: ANNUAL  COMPLAINT/DISCOVERY   
RE-INSPECTION

AIRS ID#: 0951152 DATE: 2-29-00 TIME IN: 0930 TIME OUT: 1015  
 FACILITY NAME: Litton Laser Systems  
 FACILITY LOCATION: 2787 South Orange Blossom Trail  
Apopka, FL 32703  
 RESPONSIBLE OFFICIAL: James B. Hilf PHONE: 407-297-4662  
 CONTACT NAME: \_\_\_\_\_ PHONE: \_\_\_\_\_

RECEIVED  
 APR 29 2000  
 Bureau of Air Monitoring  
 St. Mobile Source

**PART I: NOTIFICATION**

(check appropriate boxes)

1. Facility notified DARM 30 days prior to starting up
2. Facility failed to notify DARM to use a general permit
3. Halogenated solvent used at the facility:
 

perchloroethylene <input checked="" type="checkbox"/>	methylene chloride <input type="checkbox"/>
trichloroethylene <input type="checkbox"/>	1,1,1-trichloroethane <input type="checkbox"/>
carbon tetrachloride <input type="checkbox"/>	chloroform <input type="checkbox"/>
4. Facility indicated on notification form that it has the following machine type(s). Check more than one box if applicable.
 

Batch Vapor, $x \leq 1.21 \text{ m}^2$ <input checked="" type="checkbox"/>	New In-line <input type="checkbox"/>	Batch Cold <input type="checkbox"/>
Batch Vapor, $x > 1.21 \text{ m}^2$ <input type="checkbox"/>	Existing In-line <input type="checkbox"/>	

**PART II: CLASSIFICATION**

1. Indicate the machine type(s) observed at the facility:
 

Batch Vapor, $x \leq 1.21 \text{ m}^2$ <input checked="" type="checkbox"/>	New In-line <input type="checkbox"/>	Batch Cold (immersion) <input type="checkbox"/>
Batch Vapor, $x > 1.21 \text{ m}^2$ <input type="checkbox"/>	Existing In-line <input type="checkbox"/>	Batch Cold (remote reservoir) <input type="checkbox"/>

**PART III: GENERAL CONTROL REQUIREMENTS**

**A. Batch Vapor and In-Line Machines**

Does the facility:

- 1. Maintain an idling and downtime mode cover that is readily opened and closed, that completely covers, has no cracks, holes, or defects; OR maintain a room designed with reduced draft according to Part II, Section (5)(c)6.b of the permit notification?  Y  N
- 2. Maintain a freeboard ratio of 0.75 or greater?  Y  N
- 3. Utilize a parts basket or parts whose size is less than 50% of the solvent-air interface area; OR introduce parts or parts basket at 0.9 m/min (3 ft/sec) or less?  Y  N
- 4. Conduct all spraying operations within the vapor zone or an area not directly exposed to ambient air?  Y  N
- 5. Install and maintain an automated parts handling system capable of moving the parts/parts basket at 3.4 m/min. (11 ft/min) or less?  Y  N  N/A
- 6. Install and maintain a carbon adsorber on all machines using a lip exhaust? The exhaust concentration should not exceed 100 ppm halogenated solvent, the carbon adsorber should not be by-passed, the lip exhaust shall be located above the closed machine cover.  Y  N  N/A
- 7. Have each machine equipped with –
  - a. a device to shut off sump heat if the solvent level drops to the heater coils?  Y  N
  - b. a device to shut off sump heat if the vapor level rises above the height of the vapor condenser?  Y  N
  - c. a primary condenser?  Y  N
- 8. Store all waste solvent, still bottoms, and sump bottoms in closed containers?  Y  N

**B. Batch Cold Cleaning Machines**

Does the facility:

- 1. Collect and store all waste solvent in closed containers?  Y  N
- 2. Use a flexible hose or flushing device only within the freeboard area?  Y  N
- 3. Drain cleaned parts for 15 seconds or longer or until dripping ceases, whichever is longer?  Y  N
- 4. Maintain the solvent level inside the machine at or below the fill line?  Y  N
- 5. Immediately clean up spills during solvent transfer? Store wipe rags in a covered container?  Y  N
- 6. Operate the agitator to produce a rolling motion? (applicable only when air- or pump-agitated solvent bath used)  Y  N  N/A
- 7. Ensure that the machine is not exposed to drafts greater than 40 m/min (132 ft/min) when the cover is open?  Y  N
- 8. Ensure that sponges, fabrics, wood and paper products are not placed in the machine?  Y  N

*Remote Reservoir Type Only –*

- 9. Employ a tightly fitting cover over the solvent sump? The cover must be closed at all times except during parts cleaning.  Y  N  N/A

*Immersion Type Only –*

- 10. Employ a tightly fitting cover and a water layer with a thickness of at least 2.5 cm (1 in.); OR employ a tightly fitting cover and maintain a freeboard ratio of 0.75? Tightly fitting cover must be closed at all times except during parts entry and removal.  Y  N  N/A

**PART IV: PROCESS VENT CONTROLS** (not applicable to batch cold cleaning machines)

Facility chose to meet requirements using:

- control device combination / work practice standards
- alternative solvent emission limit (proceed to Part V)
- idling emission limit / work practice standards (proceed to Part V)

**A. Batch Vapor Machines,  $x \leq 1.21 \text{ m}^2$**

control comb. selected		In use
<input type="checkbox"/>	working mode cover / 1.0 freeboard ratio / superheated vapor	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	reduced room draft / 1.0 freeboard ratio / superheated vapor	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	reduced room draft / 1.0 freeboard ratio / dwell	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / superheated vapor	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / working mode cover	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / reduced room draft	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / 1.0 freeboard ratio	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / dwell	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / carbon adsorber	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	carbon adsorber / 1.0 freeboard ratio / superheated vapor	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

**B. Batch Vapor Machines,  $x > 1.21 \text{ m}^2$**

control comb. selected		In use
<input type="checkbox"/>	freeboard refrig. device / superheated vapor / 1.0 freeboard ratio	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / superheated vapor / working mode cover	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / superheated vapor / reduced room draft	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / superheated vapor / carbon adsorber	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / reduced room draft / dwell	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / reduced room draft / 1.0 freeboard ratio	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	1.0 freeboard ratio / reduced room draft / superheated vapor	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

**C. Existing In-Line Machines**

control comb. selected		In use
<input type="checkbox"/>	freeboard refrig. device / 1.0 freeboard ratio	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	superheated vapor / 1.0 freeboard ratio	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / dwell	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	carbon adsorber / dwell	<input type="checkbox"/> <input type="checkbox"/>

**D. New In-Line Machines**

control comb. selected		In use
<input type="checkbox"/>	freeboard refrig. device / superheated vapor	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	freeboard refrig. device / carbon adsorber	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	superheated vapor / carbon adsorber	<input type="checkbox"/> <input type="checkbox"/>

**PART V: RECORDKEEPING REQUIREMENTS**

Has the responsible official maintained the following:

- 1. Owner's manuals, design specifications, and other instructional materials for cleaning machine and control equipment?  Y  N
- 2. Date of installation for cleaning machine and all control devices? If the exact date is unknown, they must have a letter stating installation occurred before or after 11/29/93.  Y  N
- 3. Halogenated solvent content for each solvent used? (exempt if <5% by weight)  Y  N
- 4. Estimates of annual solvent consumption for each machine?  Y  N
- 5. Dates of solvent additions and amounts added to each machine? (applicable only to those using an alternative emission limit)  Y  N  N/A
- 6. Idling emissions limit tests, including values obtained during the initial performance test? (applicable only to those using an idling emissions limit)  Y  N  N/A
- 7. All control device and parameter monitoring? (applicable only to batch vapor and in-line machines)  Y  N  N/A
- 8. Information on remedial actions in the event of exceedances or other repairs and subsequent monitoring of affected parameters?  Y  N  N/A
- 9. Monthly emissions calculations (applicable only to those using an alternative or idling emission limit)  Y  N  N/A
- 10. 3-month rolling average emissions calculations? (applicable only to those using an alternative emission limit)  Y  N  N/A
- 11. Cleaning capacity calculations? (applicable only to those using an alternative emission limit without a solvent-air interface)  Y  N  N/A  
Has solvent-air interface.

**PART VI: ADDITIONAL SITE INFORMATION**

Viewed degreaser and logs on site.

Ilka Bundy

Inspector's Name

Ilka Bundy

Inspector's Signature

2-29-2000

Date of Inspection

2-28-2001

Approximate Date of Next Inspection



ACC

AIRS ID#: 0951152

Revised 01/18/00

ARMS 2/29/00 JB

HALOGENATED SOLVENT DEGREASERS  
AIR QUALITY GENERAL PERMIT  
ANNUAL COMPLIANCE CERTIFICATION FORM

FACILITY NAME: Litton Laser Systems DATE: 2-29-00  
 FACILITY LOCATION: 2787 South Orange Blossom Trail  
Apopka, FL 32703

Annual Reporting Period: January 1 2000 TO February 29 2000

Based on each term or condition of the Title V general air permit, my facility has remained in compliance with DEP Rule 62-213.300, Florida Administrative Code (F.A.C.), during the period covered by this statement.  YES  NO

If NO, complete the following:

#1. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from \_\_\_\_\_ to \_\_\_\_\_  
 Action(s) taken to achieve compliance: \_\_\_\_\_  
 Method used to demonstrate compliance: \_\_\_\_\_

#2. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from \_\_\_\_\_ to \_\_\_\_\_  
 Action(s) taken to achieve compliance: \_\_\_\_\_  
 Method used to demonstrate compliance: \_\_\_\_\_

All operators of solvent cleaning machines have received training on the proper operation of the machine and their control devices sufficient to pass the test required in 40 CFR Part 63 Subpart T.  YES  NO

As the responsible official, I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete.

RESPONSIBLE OFFICIAL: James B. Hill [Signature] 2/29/00  
 Name (Please Print) Signature Date

\*This form is made available to you as an aid in order to meet your annual compliance certification requirements. It is at the discretion of the responsible official to use this form.

**Litton**  
Laser Systems

ARMS  
2/29/00  
JB

P.O. Box 547300  
Orlando, Florida  
32854-7300  
407 295-4010

February 29, 2000

Ms. Ilka Bundy  
Environmental Protection Division  
Title V General Air Permits Office  
800 Mercy Drive, Suite 4  
Orlando, Florida 32808

RE: Facility # 0571152 – Annual Report – Degreaser #2

Dear Ms. Bundy:

In accordance with 40 CFR 63.468 (f) & (g), this document shall serve as our annual report for our Perchloroethylene vapor degreaser #2. Per our conversation I am submitting this report to you directly at our annual inspection.

Also note that because of confusion regarding the letter we received from the DEP from L.T. Kozlov dated April 14, 1998, we stopped monthly monitoring and submission of required annual reports because the letter indicated to us that we no longer need to do so. Now that you have clarified this situation for us, we are back on track with monthly monitoring and annual reporting. The information below is based on record keeping of solvent additions from October 1, 1998 through March 19, 1999.

**SIZE & TYPE**

14" x 10" or approximately .0905 square meters.

**AVERAGE MONTHLY SOLVENT CONSUMPTION**

Average monthly solvent consumption is 18.225-kilograms/square meter/month.

**THREE MONTH ROLLING AVERAGE REPORTS**

Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
NA	NA	NA	0	0	8.1	24.3	28.4	12.2	NA	NA	NA

Reporting period from October of 1998 through September of 1999.  
Quantities in kilograms/square meter.

**Litton**

Laser Systems

P.O. Box 547300  
Orlando, Florida  
32854-7300

407 295-4010

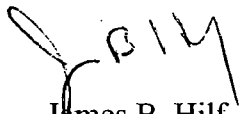
**ESTIMATED TOTAL SOLVENT CONSUMPTION**

Estimated total solvent consumption for the year = 16.5 gallons.

**STATEMENT OF TRAINING**

I, James B. Hilf, certify by my signature below that all operators of our vapor degreaser have been trained in the proper operation of the degreaser and it's control devices and that they are capable of passing the test required in 63.463(d)(10).

Sincerely,  
LITTON LASER SYSTEMS DIVISION,



James B. Hilf  
Facilities Manager

**TITLE V AIR QUALITY GENERAL PERMIT  
INSPECTION SUMMARY REPORT**

TYPE OF INSPECTION: ANNUAL  COMPLAINT/DISCOVERY  RE-INSPECTION

TIME IN: 0930 TIME OUT: 1015 AIRS ID#: 0951152  
 TYPE OF FACILITY: Halogenated Solvent Degreasers  
 FACILITY NAME: Litton Laser Systems DATE: 2-29-00  
 FACILITY LOCATION: 2787 South Orange Blossom Trail  
Apopka, FL 32703  
 RESPONSIBLE OFFICIAL: James B. Hilf PHONE NUMBER: 407-297-4625

- Based on the results of the compliance requirements evaluated during this inspection, the facility is found to be in compliance with DEP Rule 62-213.300, Florida Administrative Code (F.A.C.).
- Based on the results of the compliance requirements evaluated during this inspection, the following compliance discrepancies were noted:

COMPLIANCE REQUIREMENT/PROBLEM	FOLLOW-UP ACTION REQUIRED

COMMENTS:  
Facility in compliance.

The Annual Compliance Certification form has been properly certified and submitted to the inspector. YES  NO

DATE OF NEXT INSPECTION: 2-28-2001  
(Approximate)

INSPECTION CONDUCTED BY: Ilka Bundy  
(Please Print)

INSPECTOR'S SIGNATURE: Ilka Bundy PHONE NUMBER: 407-836-1400

YSP

# HALOGENATED SOLVENT DEGREASERS TITLE V GENERAL PERMIT COMPLIANCE INSPECTION CHECKLIST

ARMS 2/23/01 JBS

TYPE OF INSPECTION: ANNUAL (INS1, INS2)  COMPLAINT/DISCOVERY (CI)   
RE-INSPECTION (FUI)

RECEIVED  
MAR 26 2001  
Bureau of Air Monitoring  
& Mobile Sources

AIRS ID#: 0951152 DATE: 2-21-01 TIME IN: 0817 TIME OUT: 0905

FACILITY NAME: Litton Laser Systems

FACILITY LOCATION: 2787 South Orange Blossom Trail  
Apopka, FL 32703

RESPONSIBLE OFFICIAL: James B. Hilf PHONE: 407-297-4625

CONTACT NAME: \_\_\_\_\_ PHONE: \_\_\_\_\_

### PART I: NOTIFICATION

(check appropriate box) Facility Compliance Status: IN

1. New facility notified DARM 30 days prior to startup  (ARMS Data) MNC

2. Facility failed to notify DARM to use general permit  SNC

3. Halogenated solvent used at facility:

perchloroethylene <input checked="" type="checkbox"/>	methylene chloride <input type="checkbox"/>
trichloroethylene <input type="checkbox"/>	1,1,1-trichloroethane <input type="checkbox"/>
carbon tetrachloride <input type="checkbox"/>	chloroform <input type="checkbox"/>

4. Facility indicated on notification form that it has the following machine type(s). Check more than one box if applicable:

Batch Vapor, $x \leq 1.21 \text{ m}^2$ <input checked="" type="checkbox"/>	New In-line <input type="checkbox"/>	Batch Cold <input type="checkbox"/>
Batch Vapor, $x > 1.21 \text{ m}^2$ <input type="checkbox"/>	Existing In-line <input type="checkbox"/>	

### PART II: CLASSIFICATION

1. Indicate the machine type(s) observed at the facility:

Batch Vapor, $x \leq 1.21 \text{ m}^2$ <input checked="" type="checkbox"/>	New In-line <input type="checkbox"/>	Batch Cold (immersion) <input type="checkbox"/>
Batch Vapor, $x > 1.21 \text{ m}^2$ <input type="checkbox"/>	Existing In-line <input type="checkbox"/>	Batch Cold (remote reservoir) <input type="checkbox"/>

**PART III: GENERAL CONTROL REQUIREMENTS**

**A. Batch Vapor and In-Line Machines**

Does the facility:

1. Maintain an idling and downtime mode cover that is readily opened and closed, that completely covers, has no cracks, holes, or defects; OR maintain a room designed with reduced draft according to Part II, Section (5)(c)6.b of the permit notification?  Y  N
2. Maintain a freeboard ratio of 0.75 or greater?  Y  N
3. Utilize a parts basket or parts whose size is less than 50% of the solvent-air interface area; OR introduce parts or parts basket at 0.9 m/min (3 ft/sec) or less?  Y  N
4. Conduct all spraying operations within the vapor zone or an area not directly exposed to ambient air?  Y  N
5. Install and maintain an automated parts handling system capable of moving the parts/parts basket at 3.4 m/min. (11 ft/min) or less?  Y  N  N/A
6. Install and maintain a carbon adsorber on all machines using a lip exhaust? The exhaust concentration should not exceed 100 ppm halogenated solvent, the carbon adsorber should not be by-passed, the lip exhaust shall be located above the closed machine cover.  Y  N  N/A
7. Have each machine equipped with --
  - a. a device to shut off sump heat if the solvent level drops to the heater coils?  Y  N
  - b. a device to shut off sump heat if the vapor level rises above the height of the vapor condenser?  Y  N
  - c. a primary condenser?  Y  N
8. Store all waste solvent, still bottoms, and sump bottoms in closed containers?  Y  N

**B. Batch Cold Cleaning Machines**

Does the facility:

1. Collect and store all waste solvent in closed containers?  Y  N
2. Use a flexible hose or flushing device only within the freeboard area?  Y  N
3. Drain cleaned parts for 15 seconds or longer or until dripping ceases, whichever is longer?  Y  N
4. Maintain the solvent level inside the machine at or below the fill line?  Y  N
5. Immediately clean up spills during solvent transfer? Store wipe rags in a covered container?  Y  N
6. Operate the agitator to produce a rolling motion? (*applicable only when air- or pump-agitated solvent bath used*)  Y  N  N/A
7. Ensure that the machine is not exposed to drafts greater than 40 m/min (132 ft/min) when the cover is open?  Y  N
8. Ensure that sponges, fabrics, wood and paper products are not placed in the machine?  Y  N

*Remote Reservoir Type Only --*

9. Employ a tightly fitting cover over the solvent sump? The cover must be closed at all times except during parts cleaning.  Y  N  N/A

*Immersion Type Only --*

10. Employ a tightly fitting cover and a water layer with a thickness of at least 2.5 cm (1 in.); OR employ a tightly fitting cover and maintain a freeboard ratio of 0.75? Tightly fitting cover must be closed at all times except during parts entry and removal.  Y  N  N/A

**PART IV: PROCESS VENT CONTROLS** *(not applicable to batch cold cleaning machines)*

Facility chose to meet requirements using:

- control device combination / work practice standards
- alternative solvent emission limit *(proceed to Part V)*
- idling emission limit / work practice standards *(proceed to Part V)*

**A. Batch Vapor Machines,  $x \leq 1.21 \text{ m}^2$**

control comb. selected	In use
<input type="checkbox"/> working mode cover / 1.0 freeboard ratio / superheated vapor	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> reduced room draft / 1.0 freeboard ratio / superheated vapor	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> reduced room draft / 1.0 freeboard ratio / dwell	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / superheated vapor	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / working mode cover	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / reduced room draft	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / 1.0 freeboard ratio	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / dwell	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / carbon adsorber	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> carbon adsorber / 1.0 freeboard ratio / superheated vapor	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

**B. Batch Vapor Machines,  $x > 1.21 \text{ m}^2$**

control comb. selected	In use
<input type="checkbox"/> freeboard refrig. device / superheated vapor / 1.0 freeboard ratio	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / superheated vapor / working mode cover	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / superheated vapor / reduced room draft	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / superheated vapor / carbon adsorber	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / reduced room draft / dwell	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / reduced room draft / 1.0 freeboard ratio	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> 1.0 freeboard ratio / reduced room draft / superheated vapor	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

**C. Existing In-Line Machines**

control comb. selected	In use
<input type="checkbox"/> freeboard refrig. device / 1.0 freeboard ratio	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> superheated vapor / 1.0 freeboard ratio	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / dwell	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> carbon adsorber / dwell	<input type="checkbox"/> <input type="checkbox"/>

**D. New In-Line Machines**

control comb. selected	In use
<input type="checkbox"/> freeboard refrig. device / superheated vapor	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> freeboard refrig. device / carbon adsorber	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> superheated vapor / carbon adsorber	<input type="checkbox"/> <input type="checkbox"/>

**PART V: RECORDKEEPING REQUIREMENTS**

Has the responsible official maintained the following:

- 1. Owner's manuals, design specifications, and other instructional materials for cleaning machine and control equipment?  Y  N
- 2. Date of installation for cleaning machine and all control devices? If the exact date is unknown, they must have a letter stating installation occurred before or after 11/29/93.  Y  N
- 3. Halogenated solvent content for each solvent used? (exempt if <5% by weight)  Y  N
- 4. Estimates of annual solvent consumption for each machine?  Y  N
- 5. Dates of solvent additions and amounts added to each machine? (applicable only to those using an alternative emission limit)  Y  N  N/A
- 6. Idling emissions limit tests, including values obtained during the initial performance test? (applicable only to those using an idling emissions limit)  Y  N  N/A
- 7. All control device and parameter monitoring? (applicable only to batch vapor and in-line machines)  Y  N  N/A
- 8. Information on remedial actions in the event of exceedances or other repairs and subsequent monitoring of affected parameters?  Y  N  N/A
- 9. Monthly emissions calculations (applicable only to those using an alternative or idling emission limit)  Y  N  N/A
- 10. 3-month rolling average emissions calculations? (applicable only to those using an alternative emission limit)  Y  N  N/A
- 11. Cleaning capacity calculations? (applicable only to those using an alternative emission limit without a solvent-air interface)  Y  N  N/A

**PART VI: ADDITIONAL SITE INFORMATION**

Average monthly consumption is 54,179 kg / m<sup>2</sup> / month  
250.15 = 2000 year total (emissions)  
28.9 Gallons total perc for 2000

Ilka Bundy

Inspector's Name

Ilka Bundy

Inspector's Signature

2-21-01

Date of Inspection

2-21-02

Approximate Date of Next Inspection



AIRS ID#: 0951152

Revised 01/18/00

**HALOGENATED SOLVENT DEGREASERS  
AIR QUALITY GENERAL PERMIT  
ANNUAL COMPLIANCE CERTIFICATION FORM**

ARMS 2/23/01 JB

FACILITY NAME: Litton Laser Systems DATE: 2-21-01  
 FACILITY LOCATION: 2787 South Orange Blossom Trail  
Apopka, FL 32703

Annual Reporting Period: February 2000 TO February 2001

Based on each term or condition of the Title V general air permit, my facility has remained in compliance with DEP Rule 62-213.300, Florida Administrative Code (F.A.C.), during the period covered by this statement.  YES  NO

If NO, complete the following:

#1. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from \_\_\_\_\_ to \_\_\_\_\_

Action(s) taken to achieve compliance: \_\_\_\_\_

Method used to demonstrate compliance: \_\_\_\_\_

#2. Term or condition of the general permit that has not been in continuous compliance during the reporting period stated above:

Exact period of non-compliance: from \_\_\_\_\_ to \_\_\_\_\_

Action(s) taken to achieve compliance: \_\_\_\_\_

Method used to demonstrate compliance: \_\_\_\_\_

All operators of solvent cleaning machines have received training on the proper operation of the machine and their control devices sufficient to pass the test required in 40 CFR Part 63 Subpart T.  YES  NO

*As the responsible official, I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete.*

RESPONSIBLE OFFICIAL: James B Nilt JBN 2/21/01  
 Name (Please Print) Signature Date

\*This form is made available to you as an aid in order to meet your annual compliance certification requirements. It is at the discretion of the responsible official to use this form.

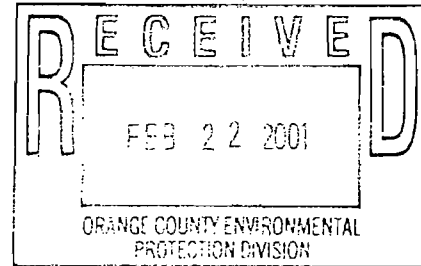
**Litton**

Laser Systems

P.O. Box 547300  
Orlando, Florida  
32854-7300

407 295-4010

February 21, 2001.

Ms. Ilka Bundy  
Environmental Protection Division  
Title V General Air Permits Office  
800 Mercy Drive, Suite 4  
Orlando, Florida 32808

RE: Facility # 0571152 – Annual Report – Degreaser #2

Dear Ms. Bundy:

In accordance with 40 CFR 63.468 (f) & (g), this document shall serve as our annual report for our Perchloroethylene vapor degreaser #2.

**SIZE & TYPE**

14" x 10" or approximately .0905 square meters.

**AVERAGE MONTHLY SOLVENT CONSUMPTION**

Average monthly solvent consumption is 51.25-kilograms/square meter/month.

**THREE MONTH ROLLING AVERAGE REPORTS**

JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
NA/	N/A	51.35	48.36	46.09	44.55	43.09	35.15	28.51	41.63	75.49	80.6

- Reporting period from January 2000 through December 2000.
- Note: There are no rolling averages for January and February 2000 because there was no data recorded for November and December of 1999.
- Quantities in kilograms/square meter.

**ESTIMATED TOTAL SOLVENT CONSUMPTION**

Estimated total solvent consumption for the year = 25.31 gallons.

**Litton**

Laser Systems

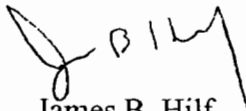
P. O. Box 547300  
Orlando, Florida  
32854-7300

407 295-4010

**STATEMENT OF TRAINING**

I, James B. Hilf, certify by my signature below that all operators of our vapor degreaser have been trained in the proper operation of the degreaser and it's control devices and that they are capable of passing the test required in 63.463(d)(10).

Sincerely,  
LITTON LASER SYSTEMS DIVISION,

A handwritten signature in black ink, appearing to read 'J B Hilf', written in a cursive style.

James B. Hilf  
Facilities Manager

**TITLE V AIR QUALITY GENERAL PERMIT  
INSPECTION SUMMARY REPORT**

**TYPE OF INSPECTION:** ANNUAL  COMPLAINT/DISCOVERY  RE-INSPECTION

TIME IN: <u>0817</u>	TIME OUT: <u>0905</u>	AIRS ID#: <u>0951152</u>
TYPE OF FACILITY: <u>Halogenated Solvent Degreasers</u>		
FACILITY NAME: <u>Litton Laser Systems</u>	DATE: <u>2-21-01</u>	
FACILITY LOCATION: <u>2787 South Orange Blossom Trail</u> <u>Apopka, FL 32703</u>		
RESPONSIBLE OFFICIAL: <u>James B. Hilf</u>	PHONE NUMBER: <u>407-297-4625</u>	

- Based on the results of the compliance requirements evaluated during this inspection, the facility is found to be in compliance with DEP Rule 62-213.300, Florida Administrative Code (F.A.C.).
- Based on the results of the compliance requirements evaluated during this inspection, the following compliance discrepancies were noted:

COMPLIANCE REQUIREMENT/PROBLEM	FOLLOW-UP ACTION REQUIRED
	✓
	✓
	✓

**COMMENTS:**  
Facility in compliance.

The Annual Compliance Certification form has been properly certified and submitted to the inspector. YES  NO

**DATE OF NEXT INSPECTION:** 2-21-02  
(Approximate)

**INSPECTION CONDUCTED BY:** Ilka Bundy  
(Please print)

**INSPECTOR'S SIGNATURE:** Ilka Bundy **PHONE NUMBER:** 407-836-1400



THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

0389992

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

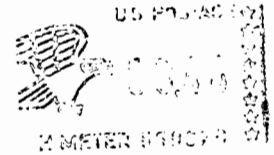
**TOTAL AMOUNT DUE: \$50.00**

Do **NOT** Remove Label

AIRS ID # 0951152  
LITTON LASER SYSTEMS (WAS 0571152)  
JAMES B HILF  
2787 S ORANGE BLOSSOM TRAIL  
APOPKA FL 32703

FOR GOVERNMENT USE ONLY  
Org.: 37550101000 EO: B1  
Fund: 20-2-035001  
Obj.: 002273

RECEIVED  
MAIL ROOM  
DEC 22 99



**Litton**

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**Laser Systems**

2787 S. Orange Blossom Trail  
Apopka, Florida  
32703

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TITLE V - GENERAL PERMIT  
RECEIPTS  
P.O. BOX 3070  
TALLAHASSEE, FL 32315-3070

Return Postage Guaranteed

P.O. NO.	INV. DATE	REFERENCE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
	12/09/99	0951152'00	50.00	0.00	50.00
			50.00	0.00	50.00

**Litton**

Laser Systems Division

P.O. Box 547300  
Orlando, Florida  
32854-7300



CHECK NO. 084683

**REMITTANCE ADVICE**



THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

400606  
check # 92582

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

**TOTAL AMOUNT DUE: \$50.00 ✓**

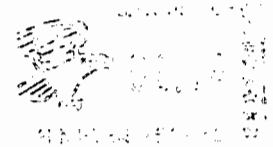
Do **NOT** Remove Label

AIRS ID # 0951152  
LITTON LASER SYSTEMS (WAS 0571152)  
JAMES B HILF  
2787 S ORANGE BLOSSOM TRAIL  
APOPKA FL 32703

FOR GOVERNMENT USE ONLY  
Org.: 37550101000 EO: A1  
Fund: 20-2-035001  
Obj.: 002273

RECEIVED  
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**Litton**

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**Laser Systems**

2787 S. Orange Blossom Trail  
Apopka, Florida  
32703

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RECEIPTS  
P.O. BOX 3070  
TALLAHASSEE, FL 32315-3070

Return Postage Guaranteed

32315-3070



P.O. NO.	INV. DATE	REFERENCE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
	12/12/00	ID#0951152	50.00	0.00	50.00
			50.00	0.00	50.00

**Litton**

**Laser Systems Division**

P.O. Box 547300  
Orlando, Florida  
32854-7300



CHECK NO. 092582

**REMITTANCE ADVICE**

P.O. NO.	INV. DATE	REFERENCE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
NONE	12/08/98	0951152	50.00	.00	50.00
			50.00	.00	50.00

**Litton**  
 Laser Systems Division

P.O. Box 547300  
 Orlando, Florida  
 32854-7300



CHECK NO. 074423

REMITTANCE ADVICE

THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

0354338

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

**TOTAL AMOUNT DUE: \$50.00**

Do **NOT** Remove Label

AIRS ID # 0951152  
LITTON LASER SYSTEMS (WAS 0571152)  
JAMES B HILF  
2787 S ORANGE BLOSSOM TRAIL  
APOPKA FL 32703

FOR GOVERNMENT USE ONLY  
Org.: 37550101000 EO: B1  
Fund: 20-2-035001  
Obj.: 002273

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DEC 21 1995  
Bureau of Air Monitoring  
& Mobile Sources

301000

THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

RECEIVED  
MAIL ROOM

TOTAL AMOUNT DUE: \$50.00

JAN 27 98

Do NOT Remove Label

LITTON LASER SYSTMS  
JAMES B HILF  
2787 S ORANGE BLOSSOM TRAIL  
APOPKA FL 32703

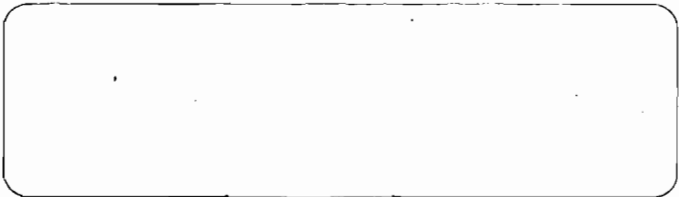
AIRS ID#~~0951152~~  
0571152

FOR GOVERNMENT USE ONLY  
Org.: 37550101000 EO: B1  
Fund: 20-2-035001  
Obj.: 002273

P.O. NO.	INV. DATE	REFERENCE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
NONE	01/13/97	011397	50.00	.00	50.00
			50.00	.00	50.00

**Litton**  
 Laser Systems Division

P.O. Box 547300  
 Orlando, Florida  
 32854-7300



CHECK NO. 065408

REMITTANCE ADVICE



THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

413004 JAN14 2002 X

Please include your AIRS ID# on your check or money order. This number can be found below on your mailing label.

**TOTAL AMOUNT DUE: \$50.00**

Do **NOT** Remove Label

AIRS ID # 0951152  
LITTON LASER SYSTEMS (WAS 0571152)  
JAMES B HILF  
2787 S ORANGE BLOSSOM TRAIL  
APOPKA FL  
32703

FOR GOVERNMENT USE ONLY  
Org.: 37550101000 EO: A1  
Fund: 20-2-035001  
Obj.: 002273

*check #4890*

P.O NO.	INV. DATE	REFERENCE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
	12-22-2001	ID 0951152	\$50.00	\$0.00	\$50.00
TOTAL			\$50.00	\$0.00	\$50.00

REMOVE DOCUMENT ALONG THIS PERFORATION



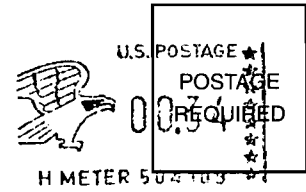
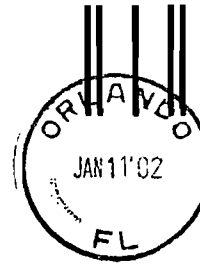
Litton Systems Inc., Laser Systems  
P.O. Box 547300  
Orlando, Florida 32854-7300

0000004890

DEPT OF ENVIRONMENTAL PROTECTI  
TITLE V AIR GENERAL PERMITS  
RECEIPTS  
P.O. BOX 3070  
TALLAHASSEE

FL USA  
32315-3070

Litton Laser Systems  
P.O. Box 547300  
Orlando, FL 32854-7300



TITLE V - General Permit  
Receipts  
Post Office Box 3070  
Tallahassee, FL 32315-3070

32315+3070 93



**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

*Receipt*

Total Postage 11 AIRS ID # 0951152

Sent To JAMES B HILF  
 Street, Apt. No or PO Box No. LITTON LASER SYSTEMS  
 2787 S ORANGE BLOSSOM TRAIL  
 City, State, ZIP APOPKA FL 32703

PS Form 3800, January 2001

See Reverse for Instructions

7001 0320 0001 7975 8657

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Received by (Please Print Clearly) <i>OLMEDA</i> B. Date of Delivery <i>4/15</i></p> <p>C. Signature <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes          If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>11 AIRS ID # 0951152          JAMES B HILF          LITTON LASER SYSTEMS          2787 S ORANGE BLOSSOM TRAIL          APOPKA FL 32703</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>7001 0320 0001 7975 8657</p>	
<p>PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789</p>	

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

7001 0320 0001 7975 8008

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To **11** AIRS ID # 0951152  
**JAMES B HILF**  
 Street, A or PO Box **LITTON LASER SYSTEMS**  
 City, State **2787 S ORANGE BLOSSOM TRAIL**  
**APOPKA FL 32703**

PS Form Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:

**11** AIRS ID # 0951152  
**JAMES B HILF**  
**LITTON LASER SYSTEMS**  
**2787 S ORANGE BLOSSOM TRAIL**  
**APOPKA FL 32703**

**COMPLETE THIS SECTION ON DELIVERY**

A: Received by (Please Print Clearly) **Jeanne Ross** B: Date of Delivery **4/22**

C: Signature **Jeanne Ross**  Agent  
 Addressee

D: Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

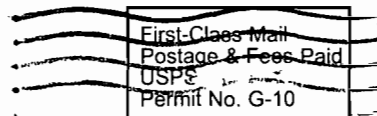
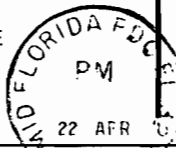
3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2 Article Number (Copy from service label) **7001 0320 0001 7975 8008**

0112

UNITED STATES POSTAL SERVICE



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Postage & Fees Paid  
USPS  
Permit No. G-10

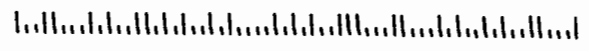
• Sender: Please print your name, address, and ZIP+4 in this box •

DARM/MOBILE SOURCE CONTROL PROGRAM  
DEPT. OF ENVIRONMENTAL PROTECTION  
MAIL STATION 5510  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

Bureau of Air Monitoring  
Mobile Source

APR 24 2002

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**NORTHROP GRUMMAN**  
*Electronic Systems*

Northrop Grumman Corporation  
**Laser Systems**  
P.O. Box 547300  
Orlando, FL 32854-7300



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01327

General Permits Section  
Bureau of Air Monitoring and Mobile Sources,  
MS 5510  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

