# Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

**PERMITTEE**

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

Authorized Representative:
Michael T. Jones, Director, Global Manufacturing

Air Permit No. 1090023-007-AF
Federally Enforceable State Operation Permit

Main "South" Complex
St. County, Florida

**PROJECT**

This is the final Federally Enforceable State Operation Permit, which authorizes the continued operation of Main "South" Complex, which is an Aircraft Rework and Manufacturing Facility (Standard Industrial Classification No. 3721). This project authorizes the renewal of the Main Complex. The facility is located in St. Johns County at 5000 U.S. 1 North, St. Augustine, in St. Johns County, Florida. The UTM coordinates are Zone 17, 466.8 km East, and 3313.8 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

**Permitting Authority**: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Northeast District Office. The Permitting Authority's physical address is: 8800 Baymeadows Way W., Suite 100, Jacksonville, Florida 32256. The Permitting Authority's mailing address is: 8800 Baymeadows Way W., Suite 100, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 904/256-1700.

**Petitions.** A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the

proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation**: Mediation is not available in this proceeding.

**Effective Date**: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

**Judicial Review**: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

1090023-007-AF Effective Date: March 7, 2016
Renewal Application Due Date: January 6, 2021
Expiration Date: March 7, 2021

Executed in Jacksonville, Florida

Richard S. Rachal III, P.G.
Program Administrator
Permitting Program

## FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that this Federally Enforceable State Operation Permit, Combined Appendices, and all copies were sent before the close of business on March 7, 2016 to the listed persons.

Michael T. Jones, Director, Global Manufacturing, - Northrop Grumman Systems Corporation (mt.jones@ngc.com)
Richard Doria, P. E. - Northrop Grumman Systems Corporation (richard.doria@ngc.com)

Leslie Maybin — March 7, 2016
Clerk — Date

## FACILITY DESCRIPTION

The Main "South" Complex is an aircraft manufacturing and rework facility consisting of assembly and fabrication functions such as drilling, fastening, joining, painting, and conversion coatings of aircraft components. Processes which are electrical, hydraulic, avionic, and mechanical are of regular occurrence during manufacturing and rework operations.

In 2015, the construction of a 369,000 sq. ft. production facility (Building 100) was completed at the Main "South" Complex. This building consolidated existing manufacturing operations from existing buildings under one roof; emissions remain the same and are unchanged.

Facility-wide solvent usage with the emissions limited as follows:

1. VOCs emissions with a facility total VOCs cap of 75.0 TPY.
2. HAP emissions with a cap for each HAP of 9.5 TPY.
3. HAPs emissions with a facility total HAPs cap of 24.5 TPY.

The existing facility consists of the following emissions unit.

| EU No. | Emission Unit Description |
|---|---|
| 001 | Aircraft Rework & Manufacturing Facility |

## APPLICABLE REGULATIONS

**Engines**: Based on Rule 62-210.300(3)(a)35., F.A.C., these engine also meets the Categorical Exemption from the requirement to obtain a an air construction permit or non-Title V air operation permit. However per Rule 62-210.300(3)(a)35.h, F.A.C., because these engines are subject to 40 CFR Part 63, Subpart ZZZZ, adopted and incorporated by reference at Rule 62-204.800, F.A.C., the owner or operator shall comply with all limitations and requirements of Subpart ZZZZ that apply to these engines by meeting the applicable standards in 40 CFR 60, Subparts IIII or 40 CFR 60, Subparts JJJJ. If emissions testing is required pursuant to any of these Subparts, all notifications of upcoming tests and reports shall be submitted to the Department in accordance with the provisions of these Subparts.

**Compression Ignition "Emergency Use" RICE Assets**

| Asset Number | Description | Category | RICE NESHAP ZZZZ Applies? | NSPS Subpart IIII Applies? | Location | Displacement per cylinder | Compliance Evidence for Subpart IIII | HP Rating | Manf. Year |
|---|---|---|---|---|---|---|---|---|---|
| G100-1 | CATERPILLAR 500KW BI-FUEL STANDBY GENERATOR | New | Yes Follow **CI-RNCR** listed below | Yes | Bldg. 100 | 1.26 L | Certificate of Conformance | 568 | 2015 |
| FP101B1 | DIESEL FIRE PUMP | New | Yes Follow **CI-RNCR** listed below | Yes | Bldg. 101B | 1.5 L | Certificate of Conformance | 350 | 2014 |
| FP101B2 | DIESEL FIRE PUMP | New | Yes Follow **CI-RNCR** listed below | Yes | Bldg. 101B | 1.5 L | Certificate of Conformance | 350 | 2014 |
| FP2701A | DIESEL FIRE PUMP #1 | New | Yes Follow **CI-RNCR** listed below | Yes | Bldg. 27 | 1.5 L | Certificate of Conformance | 327 | 2012 |

| Asset Number | Description | Category | RICE NESHAP ZZZZ Applies? | NSPS Subpart IIII Applies? | Location | Displacement per cylinder | Compliance Evidence for Subpart IIII | HP Rating | Manf. Year |
|---|---|---|---|---|---|---|---|---|---|
| FP2702A | DIESEL FIRE PUMP #2 | New | Yes Follow **CI-RNCR** listed below | Yes | Bldg. 27 | 1.5 L | Certificate of Conformance | 327 | 2012 |
| FP2703A | DIESEL FIRE PUMP #3 | New | Yes Follow **CI-RNCR** listed below | Yes | Bldg. 27 | 1.5 L | Certificate of Conformance | 327 | 2012 |
| G10-1 | CATERPILLAR DIESEL GENERATOR 1250 KVA 480V (< 15 hr/year Load Control) | Existing | Yes Follow **CI-RNCR** listed below | No – Manufactured before April 2006 and is not a Fire Pump | Bldg. 10 | 4.3 L | No emissions Testing or Notification requirements | 1,482 | 1986 |
| SA-01267 | OLYMPIAN STAND-BY GENERATOR | Existing | Yes Follow **CI-RNCR** listed below | No – Manufactured before April 2006 and is not a Fire Pump | Bldg. 55 | 1.45 L | No emissions Testing or Notification requirements | 325 | 2004 |
| SA02147 | OLYMPIAN STAND-BY GENERATOR | Existing | Yes Follow **CI-RNCR** listed below | No – Manufactured before April 2006 and is not a Fire Pump | Bldg. 27 | 1.45 L | No emissions Testing or Notification requirements | 325 | 2005 |
| SA02398 | OLYMPIAN STAND-BY GENERATOR | Existing | Yes Follow **CI-RNCR** listed below | No – Manufactured before April 2006 and is not a Fire Pump | Bldg. 60 | 1.45 L | No emissions Testing or Notification requirements | 325 | 2005 |

### Spark Ignition "Emergency Use" RICE Assets

| Asset Number | Description | Type | RICE NESHAP ZZZZ Applies? | Subpart JJJJ Applies | Subpart IIII Applies? | Location | HP Rating | Manf Year |
|---|---|---|---|---|---|---|---|---|
| G10-2 | 4 Stroke, Rich Burn, Propane generator | Existing | Yes – Follow **SI-RNCR** below | No | No | Bldg. 10 | 50 | 1995 |
| G9-1 | 4 Stroke, Rich Burn, Propane Generator | Existing | Yes – Follow **SI-RNCR** below | No | No | Bldg. 9 | 50 | 1995 |

**Facility**: This emissions unit is subject to the requirements of Rule 62-296.320, F.A.C.; 40 CFR 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources; and 40 CFR 63, Subpart WWWWWW – National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations. As of 3/7/2016, 40 CFR 63, Subpart HHHHHH nor Subpart WWWWWW have been adopted by the State. Therefore EPA Region 4 is the Permitting and Compliance Authority for these regulations.

## FACILITY REGULATORY CLASSIFICATION

- The facility **is not** a major source of hazardous air pollutants (HAP).
- The facility **has no** units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility **is not** a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility **is not** a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility **has** one or more emissions units subject to NESHAP (40 CFR 63).
- This facility **has** one or more emissions units subject to NSPS (40 CFR 60).

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office. The Northeast District, Florida Department of Environmental Protection (Department) Air Permitting. Office physical and mailing address is 8800 Baymeadows Way W., Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Florida Department of Environmental Protection (Department) Compliance Assurance at: 8800 Baymeadows Way W., Suite 100, Jacksonville, Florida 32256.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Renewal: Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. [Rule 62-4.090, F.A.C.]

8. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) District Office. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]

   *{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}*

## A. EU001 Aircraft Rework & Manufacturing Facility

This section of the permit addresses the following emissions unit.

| EU No. | Emission Unit Description |
|---|---|
| 001 | Aircraft Rework & Manufacturing Facility |

This emissions unit is subject to the requirements of Rule 62-296.320, F.A.C.

**PERFORMANCE RESTRICTIONS**

**1. Emissions Standards**.

| ID | MATERIAL | POLLUTANT | EMISISONS LIMIT | RULE | TEST METHOD |
|---|---|---|---|---|---|
| 001 | Materials containing VOC[1] | VOC | --- | 75.0[2] | ---[3] |
| | | HAP[4] | --- | 9.5[5] | ---[3] |
| | | HAPs[6] | --- | 24.5[7] | ---[3] |
| | | Odor | ---[8] | --- | --- |

[1]VOC - Volatile Organic Compounds
[2]Basis: Requested facility cap for all VOCs.
[3]Compliance shall be determined by recording all of the data for materials containing HAPs and VOCs that are required to determine the emissions of each HAP, total HAPs and total VOCs (C.A.S. NAME, INV., UNIT, CONV FCTR., GAL, LBS/GAL, WGT/VOL, COMP. %, EMISSIONS in LB with TPY at end of year and include a LEGEND) and submitting this data as a compliance report to the compliance authority on or before April 1 each year.
[4]HAP - Hazardous Air Pollutant
[5]Basis: Requested cap for each HAP.
[6]HAPs - more than one HAP.
[7]Basis: Requested facility cap for total HAPs.
[8]None objectionable.

[Rule 62-210.200(PTE), F.A.C.]

**2. Hours of Operation**. The hours of operation of are not limited (8760 hours per year).

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

**3. Table GM-FE-5**. Sources of fugitive emissions are listed in the attached Appendix E. Table GM-FE-5.

**4.** This EU is subject to the applicable requirements of the attached Combined Appendices.

**5. Objectionable Odor**. This facility is subject to the requirements of the attached Combined Appendices.

[Rule 62-296.320(2), F.A.C., Objectionable Odor Prohibited; and, Rule 62-210.200(200), F.A.C., Definitions-Objectionable Odor]

**6. Annual Operation Report**. This facility is subject to the requirements of the attached Combined Appendices.

[Rule 62-210.370(3), F.A.C].