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 & CoE Leader

Air Permit No. 1090041-007-AF
Federally Enforceable State Operation Permit

St. Augustine Site, North Complex
St. Johns County, Florida

PROJECT

This is the final Federally Enforceable State Operation Permit, which authorizes the operation of Northrop Grumman Systems Corporation, St. Augustine Site, North Complex, which is an Aircraft Rework and Manufacturing Facility (Standard Industrial Classification No. 3711). This project renews the Federally Enforceable State Operation Permit for the continued operation of the St. Augustine Site, North Complex facility. The facility is located in St. Johns County at 495 Hawkeye View Lane off Gun Club Road, St. Augustine, in St. Johns County, Florida. The UTM coordinates are Zone 17, 467.4 km East, and 3314.4 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 West W., Suite 100, Jacksonville, Florida 32256. The Permitting Authority's mailing address is: 8800 Baymeadows West 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, Agency_Clerk@dep.state.fl.us. 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.

1090041-007-AF Effective Date: February 23, 2016
Renewal Application Due Date: December 25, 2021
Expiration Date: February 23, 2021

Executed in Jacksonville, Florida

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

FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Federally Enforceable State Operation Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Michael T. Jones, Director, Global Manufacturing & CoE Leader, Northrop Grumman Systems Corporation-North Complex mt.jones@ngc.com

Richard Doria, P.E., Northrop Grumman Systems Corporation-North Complex, richard.doria@ngc.com

Clerk Stamp

February 23, 2016
Date:

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

FACILITY DESCRIPTION

The St. Augustine Site, North Complex is an existing Aircraft Rework and Manufacturing facility. Air craft are delivered and components such as systems for avionics, electronics and hydraulics are cleaned, lubricated or otherwise serviced. Operations include hand wipe solvent cleaning, and "touch up" hand painting with brushes and rollers. All operations occur inside an enclosed building. Conversion coating and or spray painting operations do not occur at this facility.

There are no physical processing units to which operating rates can be linked. Emissions from the plant are fugitive that are produced through solvent hand wipe cleaning, parts cleaning adhesive and sealant usage and touch up hand painting.

Miscellaneous activities include fabrication functions such as drilling, fastening and joining.

Exempt Emissions Units/Activities

The following emissions units/activities are exempt from air permitting:

Asset No.	Description	Type	Location	HP Rating	Manufacture Yr.
FP401	Diesel fire pump #1 North 40	Existing	Bldg 40D	375	1988
FP402	Diesel fire pump #2 North 40	Existing	Bldg 40D	375	1988
SA-01316	Olympian stand-by generator	Existing	Bldg 40C	325	2004

Three (3) existing stationary reciprocating internal combustion engines (RICE) for emergency use are subject to NESHAP Subpart ZZZZ -National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion 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 C.F.R. 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. If emissions testing is required pursuant to Subpart ZZZZ, all notifications of upcoming tests and reports shall be submitted to the Department in accordance with the provisions of Subpart ZZZZ.

The existing facility consists of the following emissions unit(s)

EU No.	Emission Unit Description
001	Aircraft Rework & Mfg Facility
Exempt Emissions Units	
FP401	Existing 375 HP Diesel Fire Pump Engine (manufactured 1988)
FP402	Existing 375 HP Diesel Fire Pump Engine (manufactured 1988)
SA-01316	Existing Olympian stand-by generator(manufactured 2004)

APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
Federal Rule Citations	
40 CFR 63, Subpart A, NESHAP General Provisions	Emergency Engines
40 CFR 63, Subpart ZZZZ- National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Emergency Engines
State Rule Citations	
Rule 62-210.300, F.A.C., Permits Required	001
Rule 62-296.320, General Pollutant Emission Limiting Standards	001
Rule 62-297. Emissions Monitoring	001

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.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office of the Department of Environmental Protection (Department) Permitting Program. The Northeast District Office mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office of the Department of Environmental Protection (Department) Compliance Assurance Program at: 8800 Baymeadows Way West, 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). Appendix GN (Source of Fugitive Emissions)

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, 62-296 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. Source Obligation:

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

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

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

   [Rule 62-212.400(12), F.A.C.]

8. Renewal. A completed **Application for Non Title V Air Permit Renewal** (DEP Form No. 62-210.900(4), F.A.C.), shall be submitted to the Department 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.]

9. 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.}

EU 001- Aircraft Rework & Manufacturing Facility

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	Aircraft Rework & Mfg Facility

PERFORMANCE RESTRICTIONS

1. **Facility wide Emissions Cap**: The facility wide total maximum allowable emissions rates for each pollutant are listed in the table below and shall not be exceeded without prior approval from the Department:

Materials	RATE	POLLUTANT	Emissions Limit LBS/HR	TPY
Materials containing VOC	---	VOC	---	10.0
		HAP	---	5.0
		HAPs	---	5.0
		Odor	---	---

Compliance with the HAP, total HAPs and VOCs emissions caps shall be demonstrated, by the recordkeeping requirements of **Specific Condition 6**, with all valid HAP, total HAPs and VOCs emissions data including, but not limited to solvent, additive and coating storage, cleanup, fugitive emissions.

[Rules 62-210.200(PTE), 62-4.070(3), F.A.C; and Permit No. 1090041-001-AF]

2. **Fugitive Emissions Table GN-FE-5:** The facility is subject to Sources of fugitive emissions listed in Table GN-FE-5 (attached to this permit).

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

3. **Hours of Operation**: The hours of operation of are not limited (8,760 hours per year).

[Rules 62-4.070(3) F.A.C. and Permit No. 1090041-001-AF]

EMISSIONS STANDARDS

4. **Volatile Organic Compounds (VOC) or Organic Solvents Emissions:** The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

[Rule 62-296.320(1), F.A.C. and Permit No. 1090041-001-AF]

5. **Objectionable Odor Prohibited**: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Rule 62-296.320(2), F.A.C. Permit No. 1090041-001-AF]

RECORDS AND REPORTS

6. **Recordkeeping**: Compliance shall be determined by recording all of the data for materials containing HAP, total HAPs and VOCs that are required to determine the emissions of each HAP, total HAPs and total VOCs including but not limited to the following:

   a. The name and C.A.S. number of each HAP, and VOC.
   b. Amount of VOC and HAP(s) containing materials used (lbs/gal and lbs/month).
   c. VOC and HAP(s) emissions (lbs/month).
   d. VOC and HAP(s) Factor (% by weight).
   e. Total cumulative VOC and HAP(s) emissions (tons per 12- month rolling average).
   f. Hours of operation base on a 12- month rolling average.

   The data shall be recorded monthly and maintained at the facility. HAP, total HAPs and VOCs emission shall be determined using the method in **Specific Condition No. 8** and submitted **as a compliance report with the AOR.**

   [Rule 62-4.070(3), F.A.C. and Permit No. 1090041-001-AF]

7. **Recordkeeping Retention**: The permittee shall maintain records of compliance onsite in either paper copy or electronic format for a period of 5 years following the date of such records. All records should be made available for an inspector's onsite review.

   [Rule 62-4.070(3), F.A.C. and Rule 62-4.160(14), F.A.C.]

8. **AOR Emissions Computations:** The emissions shall be computed using the following methods:

   - A means of validating the content of the pollutant that is contained in or is created by all materials used in or at the facility shall be demonstrated;
   - Assumption that all of the pollutants that is contained in or created by any material used in or at the facility is emitted if it cannot otherwise be accounted for in the process.
   - Where the vendor of a raw material which is used in or at the facility publishes a range of pollutant content from such material, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate;
   - In the case of a facility using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.

   [Rules 62-210.370 (2)(c)(1)a.,b., 2., 3., F.A.C. and Permit No. 1090041-001-AF]