

# ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 1865-AOP-R1

IS ISSUED TO:

BAE Systems, Inc.  
Highland Industrial Park, Bldg. M-25  
East Camden, AR 71701  
Calhoun County  
CSN: 07-0033

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

January 19, 2000                      and                      January 18, 2005

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

---

Keith A. Michaels

---

Date Modified

## **SECTION I: FACILITY INFORMATION**

PERMITTEE:	BAE Systems, Inc.
CSN:	07-0033
PERMIT NUMBER:	1865-AOP-R1
 FACILITY ADDRESS:	 Highland Industrial Park, Bldg. M-25 East Camden, AR 71701
 COUNTY:	 Calhoun
 CONTACT POSITION:	 Linda Mahon Safety/Environmental Manager
 TELEPHONE NUMBER:	 (870) 574-1712 x156
 REVIEWING ENGINEER:	 David Triplett
 UTM North-South (X):	 Zone 15 [ 3721.291 ]
 UTM East-West (Y):	 Zone 15 [ 528.983 ]

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

## **SECTION II: INTRODUCTION**

### **Summary**

BAE Systems, located at Building 25 in the Highland Industrial Park, East Camden, Calhoun County, manufactures magnesium/Teflon flares. This will be the initial modification to the operating air permit for this facility. This modification is being issued in order to allow for increased hexane usage at the facility, as well as including acetone emissions, which were omitted from the previous permit. This modification will also update the permit to include a separate facility within the same industrial park, which is also operated by BAE for the purpose of research and development, and for the disposal of undesirable flare material by burning in open pits. This separate facility was previously permitted in minor source air permit No. 750-AR-1. This modification also incorporates a change to the CSN assigned to the facility. The plant was previously assigned a CSN for Ouachita County, when it is actually located in Calhoun County. A new CSN for Calhoun County of 07-0033 was assigned to this permit. This was the CSN previously assigned to the R1/R-15 area.

Due to the inclusion of the previously unpermitted ordnance testing emissions, previously unpermitted acetone emissions, and the increase in hexane solvent usage, permitted emissions in this modification will increase by 85.6 tpy of PM/PM<sub>10</sub>, 5.7 tpy NO<sub>x</sub>, 1.7 tpy CO, 145.0 tpy VOC, 145.0 tpy hexane, 0.35 tpy hydrogen fluoride, and 0.05 tpy fluorine.

### **Process Description**

#### **Main Plant Operations:**

BAE Systems, Inc. is located at Building 25 in the Highland Industrial Park in East Camden, Arkansas. The facility manufactures magnesium/Teflon flares.

Hexane and acetone are used as solvents in the production process. All of the solvent emissions are grouped together as SN-01 for the purposes of this permit. Acetone is used as the solvent during the mixing of the raw materials used to make the powder. Hexane is used to wash the acetone from the mix. The mixing/washing process generates a liquid stream of mixed hexane and acetone. This mixture is sent to the "tank farm" area where the hexane is recovered for reuse and the acetone is emitted to the atmosphere. Hexane fumes are generated during the pre-drying process and the vacuum tumbling process. A hexane recovery system collects the exhaust vapor stream from the vacuum tumblers and condenses the hexane from that stream for reuse. Acetone is also used as a general cleanup solvent for the process equipment. All acetone and hexane used in the process eventually evaporates, so emissions may be determined through the

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

use of purchase records.

The following is a summary of the primary hexane/acetone emission points in the flare production line.

Mixing Bays:

3 mixing bays located at the main facility, with 2 Cowles mixers in each bay

Pre-Dryers:

2 bays, 1 pre-dryer in each, vibratory bed-type dryer with a heated vapor pull-off system

Vacuum Tumblers:

2 bays with 1 Abby Vacuum Tumbler (heated water jacket) in each bay

Tank Farm:

2 each 2250 gallon vertical acetone/hexane tanks  
2 each 2150 gallon vertical acetone/hexane tank  
1 each 1850 gallon vertical hexane tank  
1 each 2100 gallon horizontal hexane tank  
3 each 6100 gallon horizontal hexane tank  
2 each 6200 gallon horizontal water tank  
1 each 1037 gallon horizontal acetone tank  
1 each 1037 gallon horizontal acetone/water tank

The flares are tested in several areas around the facility. There are two tunnel testing areas and two ejection testing areas. The flare testing is grouped as SN-02. There are also several insignificant emission sources located at the main plant, which are listed in Section VII of this permit.

**R-1/R-15 Area:**

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

The R-1/R-15 area is located several miles away from the main plant. The function of the R-15 facility is to dispose of explosives and explosives-contaminated wastes. The waste material is placed in four Open Thermal Treatment Units (OTTUs) and ignited. The OTTUs are grouped as SN-03. The R-1 area contains a small research facility. This research facility contains one mixing bay with one Muller mixer. The emissions associated with this research facility are insignificant.

### **Regulations**

This facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Regulation 18), the *Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulations of the Arkansas Operating Air Permit Program* (Regulation 26).

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table.

BAE Systems, Inc.  
 Permit #: 1865-AOP-R1  
 CSN #: 07-0033

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
	Total Allowable Emissions	PM	579.6	85.6	
		PM <sub>10</sub>	579.6	85.6	
		NO <sub>x</sub>	44.7	6.6	
		CO	13.4	2.0	
		VOC	112.5	225.0	
		Hexane <sup>1</sup>	112.50	225.00	
		Hydrogen	17.56	2.59	
		Fluoride	0.44	0.06	
		Fluorine	163.0	326.25	
		Acetone <sup>2,3</sup>			
01	Process Solvent Emissions	VOC	112.5	225.0	9
		Hexane	112.50	225.00	
		Acetone <sup>2,3</sup>	163.00	326.25	
02A	Ordnance Testing Test Tunnel #1	PM	3.1	*	11
		PM <sub>10</sub>	3.1		
		NO <sub>x</sub>	0.3		
		CO	0.1		
		Hydrogen	0.10		
		Fluoride	0.01		
		Fluorine			
		PM	3.1	*	11
		PM <sub>10</sub>	3.1		
		NO <sub>x</sub>	0.3		
		CO	0.1		
		Hydrogen	0.10		
		Fluoride	0.01		
Fluorine					

BAE Systems, Inc.  
 Permit #: 1865-AOP-R1  
 CSN #: 07-0033

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
02C	Ordnance Testing Ejection Site #1	PM	3.1	*	11
		PM <sub>10</sub>	3.1		
		NO <sub>x</sub>	0.3		
		CO	0.1		
		Hydrogen	0.10		
		Fluoride	0.01		
		Fluorine			
02D	Ordnance Testing Ejection Site #2	PM	0.3	*	11
		PM <sub>10</sub>	0.3		
		NO <sub>x</sub>	0.1		
		CO	0.1		
		Hydrogen	0.01		
		Fluoride	0.01		
		Fluorine			
02	Ordnance Testing Annual Emissions	PM	**	11.4	11
		PM <sub>10</sub>		11.4	
		NO <sub>x</sub>		0.9	
		CO		0.3	
		Hydrogen		0.35	
		Fluoride		0.01	
		Fluorine			
03	Open Thermal Treatment Units (OTTUs)	PM	570.0	74.1	14
		PM <sub>10</sub>	570.0	74.1	
		NO <sub>x</sub>	43.7	5.7	
		CO	13.0	1.7	
		Hydrogen	17.25	2.24	
		Fluoride	0.40	0.05	
		Fluorine			

\* Annual emissions are combined for all 4 emission points.

\*\* Hourly emissions are given for each emission point.

<sup>1</sup> Hexane is included in the Total VOC.

<sup>2</sup> Acetone is not a VOC.

<sup>3</sup> Acetone is not a HAP.

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

### **SECTION III: PERMIT HISTORY**

Permit No. 1865-AOP-R0 was issued to Marconi Aerospace on January 19, 2000. This was the initial air permit for this existing Title V flare production facility. This permit quantified emissions of VOC and Hexane from the flare production process. Acetone emissions were omitted from the permit application by the permittee, and were not included in the permit at this time. The ordnance testing process was also omitted from the permit application. Emissions were permitted at 80.0 tpy of VOC and 80.0 tpy hexane.

Permit No. 750-A was issued to Tracor Aerospace on April 5, 1985. This was the initial permit for the R-1/R-15 area. In the permit, the facility was limited to burning no more than 100 lb of waste per 24-hour period. Emission levels were not quantified at this time.

Permit No. 750-AR-1 was issued to Tracor Aerospace on April 7, 1988. This modification was issued in order to allow for the operation of two additional open burn pits (for a total of four) and to allow for the burning of up to 100 lb of waste per pit per day, for a total of 400 lb waste burned per day. Emission levels were not quantified at this time.

This permit modification (1865-AOP-R1) will combine the two previously existing air permits into one Title V Operating Air Permit. The combined Title V permit has been assigned CSN 07-0033, which was the CSN previously assigned to the R-1/R-15 area facility.



**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

#### **SECTION IV: EMISSION UNIT INFORMATION**

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

**SN-01**

**Process Solvent Emissions**

**Source Description**

This source accounts for all of the process solvent emissions due to the usage of acetone and hexane in the flare production process. All of the acetone and hexane used at the plant is eventually emitted to the atmosphere. Emissions occur primarily during the mixing and flare drying processes.

**Specific Conditions**

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3.

Pollutant	lb/hr	tpy
VOC	112.5	225.0

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #3.

Pollutant	lb/hr	tpy
Hexane <sup>1</sup>	112.5	225.00
Acetone <sup>2</sup>	163.00	326.25

<sup>1</sup> Hexane is included in the total VOC

<sup>2</sup> Acetone is not a VOC or a HAP

3. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, the permittee shall maintain records of the amount of hexane and acetone purchased during each month. A rolling 12 month total and each

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

individual month's data shall be kept on site, updated monthly, and be made available to Department personnel upon request. This condition will monitor the amount of hexane and acetone lost to the atmosphere by assuming that the amount of hexane and acetone purchased equals the amount of hexane and acetone emitted. A report of these records shall be submitted to the Department in accordance with General Provision #7.

**SN-02**  
**(SN-02A, 02B, 02C, 02D)**

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

**Ordinance Testing**

**Source Description**

Flares are tested in several areas around the facility. There are two tunnel testing areas and two ejection testing areas. The four flare testing emission points are grouped as SN-02.

**Specific Conditions**

4. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #6.

Source	Pollutant	lb/hr	tpy
02A	PM <sub>10</sub>	3.1	*
	NO <sub>x</sub>	0.3	
	CO	0.1	
02B	PM <sub>10</sub>	3.1	*
	NO <sub>x</sub>	0.3	
	CO	0.1	
02C	PM <sub>10</sub>	3.1	*
	NO <sub>x</sub>	0.3	
	CO	0.1	
02D	PM <sub>10</sub>	0.3	*
	NO <sub>x</sub>	0.1	
	CO	0.1	
Total SN-02	PM <sub>10</sub>	**	11.4
	NO <sub>x</sub>		0.9
	CO		0.3

\* Annual Emissions are combined for all four emission points.

\*\* Hourly Limits are given for individual emission points.

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

5. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Condition #6.

Source	Pollutant	lb/hr	tpy
02A	PM Hydrogen Fluoride Fluorine	3.1 0.10 0.01	*
02B	PM Hydrogen Fluoride Fluorine	3.1 0.10 0.01	*
02C	PM Hydrogen Fluoride Fluorine	3.1 0.10 0.01	*
02D	PM Hydrogen Fluoride Fluorine	0.3 0.01 0.01	*
Total SN-02	PM Hydrogen Fluoride Fluorine	** ** **	11.4 0.35 0.01

\* Annual Emissions are combined for all four emission points.

\*\* Hourly Limits are given for individual emission points.

6. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, the permittee shall not test more than 20,000 pounds of ordnance material at SN-02 during any consecutive 12-month period.

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

7. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52 Subpart E, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #6. These records shall be updated by the 15<sup>th</sup> day of the month following the month to which the records pertain. A 12-month rolling total and each individual month's data shall be maintained on-site and provided to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.
8. Pursuant to §19.505(B) of Regulation 19 and 40 CFR Part 52 Subpart E, an exemption from the opacity limitation of §19.503(B) of Regulation 19 has been granted by the ADEQ Director for this source. The operation of SN-02A through SN-02D shall be conducted in such a manner as to cause no nuisance to the surrounding community. The Department reserves the right to rescind this exemption if, at any time, the emissions from the operations become a nuisance to the surrounding community. A copy of the approval letter for this exemption is included as Appendix A of this permit.

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

**SN-03**

Open Thermal Treatment Units (OTTUs) - R-15 area

**Source Description**

The function of the R-15 facility is to dispose of explosives and explosives-contaminated wastes. The waste material is placed in four Open Thermal Treatment Units (OTTUs) and ignited. The OTTUs are grouped as SN-03.

**Specific Conditions**

9. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Conditions #11 and #13.

Pollutant	lb/hr	tpy
PM <sub>10</sub>	570.0	74.1
NO <sub>x</sub>	43.7	5.7
CO	13.0	1.7

10. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Conditions #11 and #13.

Pollutant	lb/hr	tpy
PM	570.0	74.1
Fluorine	0.40	0.05
Hydrogen Fluoride	17.25	2.24

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

11. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, the permittee shall not burn more than 500 lb of wastes at SN-03 during any consecutive 24-hour period.
12. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52 Subpart E, the permittee shall maintain daily records which demonstrate compliance with Specific Condition #11. These records shall be maintained on-site and shall be made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.
13. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, the permittee shall not burn more than 130,000 lb of wastes at SN-03 during any consecutive 12-month period.
14. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52 Subpart E, the permittee shall maintain monthly records which demonstrate compliance with Specific Condition #13. These records shall be updated by the 15<sup>th</sup> day of the month following the month to which the records pertain. A 12-month rolling total and each individual month's data shall be maintained on-site and provided to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.
15. Pursuant to §19.505(B) of Regulation 19 and 40 CFR Part 52 Subpart E, an exemption from the opacity limitation of §19.503(B) of Regulation 19 has been granted by the ADEQ Director for this source. The operation of SN-03 shall be conducted in such a manner as to cause no nuisance to the surrounding community. The Department reserves the right to rescind this exemption if, at any time, the emissions from the operations become a nuisance to the surrounding community. A copy of the approval letter for this exemption is included as Appendix A of this permit.



**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

## **SECTION V: COMPLIANCE PLAN AND SCHEDULE**

BAE Systems, Inc. is in compliance with the applicable regulations cited in the permit application. BAE Systems, Inc. will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

**SECTION VI: PLANTWIDE CONDITIONS**

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
  1. Sampling ports adequate for applicable test methods
  2. Safe sampling platforms
  3. Safe access to sampling platforms
  4. Utilities for sampling and testing equipment
5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

## **SECTION VII: INSIGNIFICANT ACTIVITIES**

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated August 16, 2001.

Description	Category
9 - 1.26 MMBtu/hr Boilers	A-1
0.305 MMBtu/hr Hot Water Heater	A-1
2.25 MMBtu/hr Hot Water Heater	A-1
4 - 0.305 MMBtu/hr Boilers	A-1
2 - 0.270 MMBtu/hr Boilers	A-1
1 - 0.962 MMBtu/hr Boiler	A-1
Misc. Coatings, Adhesives, and Inks Usage	A-13
R-1 Area Research and Development Facility	A-13

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

## **SECTION VIII: GENERAL PROVISIONS**

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
  1. The date, place as defined in this permit, and time of sampling or measurements;

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

2. The date(s) analyses were performed;
  3. The company or entity that performed the analyses;
  4. The analytical techniques or methods used;
  5. The results of such analyses; and
  6. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
Post Office Box 8913  
Little Rock, AR 72219

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the occurrence. The initial report may be made by telephone and shall include:
1. The facility name and location,
  2. The process unit or emission source which is deviating from the permit limit,
  3. The permit limit, including the identification of pollutants, from which deviation occurs,
  4. The date and time the deviation started,

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

5. The duration of the deviation,
6. The average emissions during the deviation,
7. The probable cause of such deviations,
8. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
9. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.



**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
  1. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  4. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
  1. The identification of each term or condition of the permit that is the basis

**BAE Systems, Inc.**  
**Permit #: 1865-AOP-R1**  
**CSN #: 07-0033**

- of the certification;
  2. The compliance status;
  3. Whether compliance was continuous or intermittent;
  4. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
  5. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:
1. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  2. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  3. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
  4. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

## **APPENDIX A**

## **APPENDIX B**

## **APPENDIX C**

## **APPENDIX D**



## Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 602, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

BAE Systems, located at Building 25 in the Highland Industrial Park, East Camden, Calhoun County, manufactures magnesium/Teflon flares. This will be the initial modification to the operating air permit for this facility. This modification is being issued in order to allow for increased hexane usage at the facility as well as including acetone emissions which were omitted from the previous permit. This modification will also update the permit to include a separate facility within the same industrial park which is also operated by BAE for the purpose of research and development, and for the disposal of undesirable flare material by burning in open pits. This separate facility was previously permitted in minor source air permit No. 750-AR-1.

Due to the inclusion of the previously unpermitted ordnance testing emissions, previously unpermitted acetone emissions, and the increase in hexane solvent usage, permitted emissions in this modification will increase by 85.6 tpy of PM/PM<sub>10</sub>, 5.7 tpy NO<sub>x</sub>, 1.7 tpy CO, 145.0 tpy VOC, 145.0 tpy hexane, 0.35 tpy hydrogen fluoride, and 0.05 tpy fluorine.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact David Triplett, Engineer. Both Doug Szenher and David Triplett can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Public Library of Camden and Ouachita County located at 120 Harrison Avenue SW, Camden, Arkansas, 71701. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Doug Szenher. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Richard A. Weiss  
Interim Director