BAE SYSTEMS

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In Reply Reference 6307RO
Federal Express Tracking Number: 7729 6287 4943

August 13, 2018

Ms. Michelle Walker Owenby, Director
Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243

Reference: BAE Systems Ordnance Systems Inc., Holston Army Ammunition Plant, Supplemental Information for 31 MAY 2018 HSAAP Expansion Project PSD Permit Application for source 37-0028. This supplemental submission includes revisions specific pages pertaining to Vent E to clarify emissions for coating operations.

Dear Ms. Owenby:

BAE Systems Ordnance Systems Inc. (OSI), operating contractor for Holston Army Ammunition Plant (HSAAP) in Kingsport (Emission Source Reference Number 37-0028), respectfully submits the enclosed supplemental information for the 31 MAY 2018 Prevention of Significant Deterioration (PSD) construction permit application for sources to be located at the Area B facility in Hawkins County, Tennessee. The application was previously submitted and there is minor variations in these pages. The submitted information is to ensure all information is adequately understood specifically for the emissions from Vent E for the coating operation.

The coating process was included with the original application however there are two types of products coated in one of the stills. The pages included in this submission intends to clarify the emissions for these two products. There are no requested changes to any monitoring method or additional requirements. Changes are noted in the enclosed pages 44-51 from the BACT analysis, page A-57 from Appendix A, and pages B-22 and B-24 from the Appendix B calculations pages. This only affects the coating still in Building [redacted] identified as Vent E. Emissions from this vent are volatile organic compounds (VOCs). Again there are no changes to the total VOC emission associated with this clarification.

A portion of the information provided in this supplemental packet are considered confidential business information (CBI). Only information previously approved as CBI is marked so in the redacted version. A hard copy of this document is being sent by FedEx to the division today marked as CBI. OSI requests that this entire submittal be considered confidential and not for public distribution in accordance with

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BAE SYSTEMS

TDEC-DAPC rule 1200-03-09-.02(11)(d)(iii). A separate redacted version suitable for public viewing will be submitted electronically today.

These documents provide information consistent with the requirements of Rules 1200-03-09-.01(4) of the Tennessee Department of Environment and Conservation, Division of Air Pollution Control Regulations. Pursuant to Tennessee Air Pollution Control regulation 1200-03-09 and 40 CFR 52.21, I have reviewed the information contained in this May 31, 2018 PSD Construction Permit Application supplemental marked as Revision 1 and dated 13 AUG 2018, in its entirety. To the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

Mr. James Ogle serves as OSI's primary contact for air program issues and may be reached at (423) 578-6231 or by email at james.ogle@baesystems.com. Please do not hesitate to contact Mr. Ogle should questions arise or additional information be needed.

Sincerely,

BAE SYSTEMS Ordnance Systems Inc.

Robert E. Winstead
Director EHSS

cc Environmental Affairs/Ogle
HSAAP/Vestal
Environmental Affairs Files 1305/2018

Enclosure: OSI HSAAP Expansion Project 31 MAY 2018 – PSD Application Revision 1 CONFIDENTIAL sent by FedEx number 7729 6287 4943

OSI HSAAP Expansion Project 31 MAY 2018 – PSD Application Revision 1 REDACTED sent electronically

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the two tanks as fixed roof, external floating roof, and internal floating roof are provided in Appendix B.) Therefore, a flare, thermal oxidation, a condenser, catalytic oxidation, carbon adsorption, a scrubber, internal floating roof, and external floating roof are eliminated from further consideration.

Step 5: Select BACT

There are no applicable NSPS or NESHAP rules that would establish a baseline VOC emission rate for the fuel oil storage tanks.

BACT is proposed as white/light color, submerged fill, and good maintenance practices and a combined VOC emission rate of 0.2 tpy.

4.5 BACT Analysis for [redacted], Recrystallization and Coating

4.5.1. Process Description

HSAAP proposes to install process equipment in Building [redacted] for the recrystallization and coating of explosives. The equipment in Building [redacted] will be used for four separate batch processes, two recrystallization and two coating. The recrystallization of [redacted] will result in emissions of VOCs while the recrystallization of [redacted] does not. VOC emissions result from the use of cyclohexanone to dissolve the [redacted]. The majority of the cyclohexanone is recovered for reuse by boiling and condensation. VOC emissions from this process are vented to the atmosphere, controlled by primary condensers in series with a vent condenser (Vent A). When coating [redacted], water and [redacted] are charged to a still and heated. [redacted] The [redacted] may be dissolved in solvent (n-octane or dioctyl adepate). For these batches, the solvent is recovered through use of a vent condenser (Vent E) when the batch is heated and collected in a storage tank for reuse. In addition to these batch process, [redacted] tanks containing solvent or a solvent/water mixture will have small volumes of uncontrolled VOC emissions (less than 0.2 tpy for all four tanks combined). Because the VOC emissions from the tanks are each well below 5 tpy, the four tanks are considered insignificant emission units.

4.5.2 BACT Analysis for VOC Emissions from [redacted], Recrystallization Tanks Step 1 : Identify All Control Technologies

Potential VOC control technologies for the [redacted] tanks include:

- Flare
- Thermal oxidation
- Condenser
- Catalytic oxidation
- Carbon adsorption
- Scrubber
- Internal floating roof
- External floating roof
- Submerged fill
- White colored tank
- Good maintenance

Flare
Flares can be used to control almost any VOC stream, and can typically handle large fluctuations in VOC concentration, flow rate, heating value, and inert species content. The primary use of flares is that of a safety device used to control a large volume of a pollutant resulting from upset conditions. The majority of chemical plants and refineries have existing flare systems designed to relieve emergency process upsets that release large volumes of gas. Flares can reduce VOC emissions by 98% or more.

Thermal Oxidation
Thermal oxidation can be used to reduce emissions from almost all VOC sources, including reactor vents, distillation vents, solvent operations, and operations performed by ovens, dryers, and kilns. Fuel consumption is high, so thermal units are best suited for smaller process applications with moderate to high VOC loadings. Thermal oxidation can reduce VOC emissions by 98-99%

Condenser
A condenser is a control device that is used to cool an emission stream having organic vapors in it and to change the vapors to a liquid. Condensed organic vapors can be recovered, refined, and might be reused, preventing their release to the ambient air. Condensers can reduce VOC emissions by 99% or more.

Catalytic Oxidation
Catalytic oxidation, like thermal oxidation, can be used to reduce emissions from a variety of sources. Catalytic oxidation is widely used to control VOC emissions from solvent evaporation processes associated with surface coating and printing operations. Catalytic oxidation can reduce VOC emissions by 95% or more depending on the volume of catalyst used.

Carbon Adsorption
With carbon adsorption, VOC vapors condense on the surface of the adsorbent, usually activated carbon. When the surface has adsorbed nearly as much as it can, the VOC is either desorbed as part of regenerating the adsorbent or the carbon, with VOC, is disposed of. If the VOC is desorbed, the VOC vapors are usually at a higher concentration, after which the VOC is either recovered or has to be destroyed. Carbon adsorption can reduce VOC emissions by 95% or more.

Scrubber
The use of a scrubber to control VOC emissions is an absorption process (as opposed to carbon adsorption, which is an adsorption process). With a scrubber, an absorbent chemical is used to remove VOC's. The absorbent chemical is chosen based on its ability to absorb the chemical or chemicals which compose the VOC waste gas stream. In a scrubber the sorbent is intimately mixed with the VOC waste gas stream to give the sorbent the opportunity to absorb as much of the VOC as possible. Scrubbers can reduce VOC emissions by 95% or more.

Internal Floating Roof
An internal floating roof tank has both a permanent fixed roof and a floating roof inside. There are two basic types of internal floating roof tanks: tanks in which the fixed roof is supported by vertical columns within the tank, and tanks with a self-supporting fixed roof and no internal support columns. An internal floating roof minimizes evaporative losses of the stored liquid.

Evaporative losses from floating roofs may come from deck fittings, nonwelded deck seams, and the annular space between the deck and tank wall. Internal floating roofs can reduce VOC emissions due to breathing losses by 75-80%.

External Floating Roof

A typical external floating roof tank consists of an open- topped cylindrical steel shell equipped with a roof that floats on the surface of the stored liquid. The floating roof consists of a deck, fittings, and rim seal system. Floating decks are of two general types: pontoon or double-deck. The purpose of the floating roof and rim seal system is to reduce evaporative loss of the stored liquid. Some annular space remains between the seal system and the tank wall. The external floating roof design is such that evaporative losses from the stored liquid are limited to losses from the rim seal system and deck fittings (breathing loss) and any exposed liquid on the tank walls (withdrawal loss). External floating roofs can reduce VOC emissions by 75-80%.

Submerged Fill

With submerged fill the fill pipe extends almost to the bottom of the tank. During most of submerged filling of the tank the fill pipe opening is below the liquid surface level. Liquid turbulence is controlled significantly, resulting in much lower vapor generation than encountered during filling without submerged fill. Submerged fill can reduce VOC emissions by 10-25%.

White Colored Tank

White or light-colored tanks do not absorb as much energy from the sun, thus they stay cooler. Since vapor pressures normally increase with increasing temperatures, cooler tanks result in lower breathing losses.

Good Tank Maintenance

Good maintenance of tanks and vents will reduce emissions from both working and breathing losses.

Twenty-five permits were found during a search of the RBLC for VOC controls for liquid storage tanks. In those 25 permits, the following was found:

Control	**Number of Permits Where Control Was Required**
White or Light-Colored Tank	8
Submerged Fill	7
External Floating Roof	5
Scrubber	5
Thermal Oxidation	3
Good Maintenance	3
Flare	2
Internal Floating Roof	1
Carbon Adsorption	1
Condenser	0
Catalytic Oxidation	0

Step 2 : Eliminate Technically Infeasible Options

All of the control technologies listed above are considered technically feasible and most have been required in permits found during the RBLC search.

Step 3: Rank Remaining Control Technologies by Effectiveness

The control technology options are ranked in order of their approximate effectiveness in Step 1, above.

Step 4: Evaluate Most Effective Controls and Document Results

As mentioned above, the four tanks will have combined uncontrolled VOC emissions of less than 0.2 tpy. Consequently, it is not considered economically feasible to apply any add-on controls to the tanks. Therefore, a flare, thermal oxidation, a condenser, catalytic oxidation, carbon adsorption, and a scrubber are eliminated from further consideration.

With regard to both internal and external floating roofs, because there is the chance that trace amounts of explosives can be present in the tanks, a floating roof tank cannot be used due to explosive design standard 11507. Therefore, floating roofs are eliminated from further consideration.

With regard to white or light-colored tanks, a white or light-colored tank would impede tank surface inspections for mechanical integrity. In addition, because the explosives are light-colored, a tank color similar to the color of the explosives would complicate leak detection. Also, there are potential issues with paint compatibility with explosives. For these reasons, white or lightcolored tanks are eliminated from further consideration.

Step 5: Select BACT

There are no applicable NSPS or NESHAP rules that would establish a baseline VOC emission rate for the [redacted], Recrystallization tanks.

BACT is proposed as submerged fill with good maintenance practices and a combined VOC emission rate of 0.18 tpy.

4.5.3 BACT Analysis for VOC Emissions from [redacted], Recrystallization Process Vent Step 1 : Identify All Control Technologies

Potential VOC control technologies for the [redacted] process vent include:

- Flare
- Thermal oxidation
- Condenser
- Catalytic oxidation
- Carbon adsorption
- Scrubber

<u>Flare</u>

Flares can be used to control almost any VOC stream, and can typically handle large fluctuations in VOC concentration, flow rate, heating value, and inert species content. The primary use of flares is that of a safety device used to control a large volume of a pollutant resulting from upset conditions. The majority of chemical plants and refineries have existing flare systems designed to relieve emergency process upsets that release large volumes of gas. Flares can reduce VOC emissions by 98% or more.

Thermal Oxidation

Thermal oxidation can be used to reduce emissions from almost all VOC sources, including reactor vents, distillation vents, solvent operations, and operations performed by ovens, dryers, and kilns. Fuel consumption is high, so thermal units are best suited for smaller process applications with moderate to high VOC loadings. Thermal oxidation can reduce VOC emissions by 98-99%

Condenser

A condenser is a control device that is used to cool an emission stream having organic vapors in it and to change the vapors to a liquid. Condensed organic vapors can be recovered, refined, and might be reused, preventing their release to the ambient air. Condensers can reduce VOC emissions by 99% or more.

Catalytic Oxidation

Catalytic oxidation, like thermal oxidation, can be used to reduce emissions from a variety of sources. Catalytic oxidation is widely used to control VOC emissions from solvent evaporation processes associated with surface coating and printing operations. Catalytic oxidation can reduce VOC emissions by 95% or more depending on the volume of catalyst used.

Carbon Adsorption

With carbon adsorption, VOC vapors condense on the surface of the adsorbent, usually activated carbon. When the surface has adsorbed nearly as much as it can, the VOC is either desorbed as part of regenerating the adsorbent or the carbon, with VOC, is disposed of. If the VOC is desorbed, the VOC vapors are usually at a higher concentration, after which the VOC is either recovered or has to be destroyed. Carbon adsorption can reduce VOC emissions by 95% or more.

Scrubber

The use of a scrubber to control VOC emissions is an absorption process (as opposed to carbon adsorption, which is an adsorption process). With a scrubber, an absorbent chemical is used to remove VOC's. The absorbent chemical is chosen based on its ability to absorb the chemical or chemicals which compose the VOC waste gas stream. In a scrubber the sorbent is intimately mixed with the VOC waste gas stream to give the sorbent the opportunity to absorb as much of the VOC as possible. Scrubbers can reduce VOC emissions by 95% or more.

HSAAP is the only facility in the US that produces the explosives RDX, HMX, and IMX. Consequently, there are no permits in the RBLC for the explosives recrystallization process. As described earlier, however, the VOC emissions produced during the batch process to recrystallize RDX result from the distillation and condensation of cyclohexanone. A search of the RBLC for VOC emissions from distillation processes resulted in the identification of nine (9) permitted VOC emission sources. Table 4-8 summarizes the control technologies and control efficiencies found during that RBLC search. Of the 9 permitted VOC emission sources, four are controlled by flares, three are controlled by routing the VOC's to the fuel gas system for energy recovery, one is controlled by thermal oxidation, and one is controlled by a scrubber. The control efficiency for all the sources, for which a control efficiency was specified, is 98%.

Table 4-8
Summary of RBLC Search for VOC Controls for the Distillation Process

Facility Name	State	Process	Control	VOC Control Efficiency (%)
Highlands Ethanol Facility	FL	Distillation	Scrubber	98
Grain Processing Corporation	IN	Distillation Heads Loadout	Enclosed Flare	98
Cardinal Ethanol	IN	Solids Distillation System	Enclosed Flare	98
Tradebe Treatment and Recycling, LLC	IN	Solids Distillation System	Flare	98
Central Indiana Ethanol	IN	Distillation Tower	Flare	98
Lake Charles Chemical	LA	Distillation Tower and Vacuum Distillation Tower	Flare or Route to Fuel Gas System	NA [1]
Lake Charles Chemical	LA	Distillation Units	Route to Fuel Gas System	NA [1]
Lake Charles Chemical	LA	Distillation and Drying	Route to Fuel Gas System	NA [1]
Lake Charles Chemical	LA	Distillation and Drying	Thermal Oxidation	NA [1]

Note:
1. Control efficiency not given.

Step 2 : Eliminate Technically Infeasible Options
Because the processes in [redacted] involve the recrystallization of [redacted], it is not technically feasible, from a safety standpoint, to employ any control technology that involves a flame. Consequently, flares, catalytic oxidation, and thermal oxidation are considered not technically feasible.

Step 3: Rank Remaining Control Technologies by Effectiveness
The control technology options are ranked in order of their approximate effectiveness in Step 1, above. After elimination of flares, catalytic oxidation, and thermal oxidation, the remaining control technologies in order of effectiveness are condenser, carbon adsorption, and scrubber.

Step 4: Evaluate Most Effective Controls and Document Results
With the exception of catalytic oxidation, the remaining control technologies provide the opportunity to recover the cyclohexanone and n-octane for reuse. Cyclohexanone and n-octane recovery by the emission control equipment is considered beneficial to the recrystallization and coating processes.

Recovery of the cyclohexanone and n-octane by either carbon adsorption or scrubber would require extra steps to separate the cyclohexanone from either the carbon or the scrubbant. Recovery of the cyclohexanone and n-octane by condensation would not require those extra steps. All three of the control technologies that provide for cyclohexanone and n-octane recovery are capable of control efficiencies of 98%.

Step 5: Select BACT

There are no applicable NSPS or NESHAP rules that would establish a baseline VOC emission rate for the [redacted], recrystallization and coating process vents. BACT is proposed as condensation for both Vent A and Vent E.

During the first 25% of the batch process inert materials used to fill process equipment between batches for safety purposes will be purged from the system. During that time condenser control efficiencies will be slightly reduced. Consequently, BACT for Vent A is proposed as the use of two condensers in series with a control efficiency during 25% of the batch process (approximately [redacted]) of 95% and a control efficiency during 75% of the batch process (approximately [redacted]) of 98%. These proposed efficiencies will result in an average hourly VOC emission rate for the batch of 0.42 lb/hr and an annual emission rate of 6.0 tpy. BACT for Vent E is proposed as the use of one condenser with a control efficiency during 25% of the batch process ([redacted]) of 95% and a control efficiency during 75% of the batch process ([redacted]) of 98%. These proposed efficiencies will result in an average hourly VOC emission rate for the batch of 0.42 lb/hr and an annual emission rate of 1.8 tpy.

4.6 BACT for Emergency Generators

In the event of the loss of electrical power, it is proposed that the facility be equipped with three emergency diesel generators. The engines will be certified by the manufacturer to the standards in 40 CFR 60, Subpart IIII. The emissions from the three proposed emergency generators will below 5 tpy, therefore they will qualify as insignificant emission units.

4.6.1 BACT Analysis for VOC, CO, and GHG Emissions from the Emergency Generators Step 1: Identify All Control Technologies

Potential VOC, CO, and GHG control technologies for the emergency generators include: Good Engine Design or GCP

Good Engine Design

The diesel-fired emergency engines will be certified to meet the required US EPA emission standards based on their model year and size. In order to achieve this certification, the engine is optimized to perform at its best design capacity.

Good Combustion Practices

Good combustion practices are used to reduce emissions of VOC, CO, and GHG by optimizing conditions in the combustion zone of a fuel burning source. Good combustion practices typically entail introducing the proper ratio of combustion air to the fuel, maintaining a minimum temperature in the firebox of the combustor, or a minimum residence time of fuel and air in the combustion zone.

Step 2: Eliminate Technically Infeasible Options

The control technologies are technically feasible.

Step 3: Rank Remaining Control Technologies by Effectiveness

1. Good engine design.
2. Good combustion practices.

Step 4: Evaluate Most Effective Controls and Document Results

The current BACT guidelines for diesel-fired emergency generators and generally accepted emissions limits meet the NSPS requirements for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60 Subpart IIII). Therefore, the use of a certified engine with good combustion practices can be considered BACT for emissions from diesel-fired emergency generators and fire pumps.

Step 5: Select BACT

BACT for the emergency generators is proposed as good engine design (NSPS Subpart IIII) and GCP with no add-on controls. Emissions from the engines will be minimal because of limited operating hours. As a result, the addition of control devices cannot be cost effective. The engines will meet BACT through EPA emission standards for NO_X+NMHC and CO and compliance with NSPS Subpart IIII as follows:

NO_X+NMHC 6.4 g/kW-hr
CO 3.5 g/kW-hr

GHG emissions are based on calculated using emission factors from 40 CFR Part 98, Subpart C, Tables C-1 and C-2.

4.7 Summary of Proposed BACT

Table 4.9 summarizes the emission limits and control technologies proposed as BACT for VOC, CO, and GHG.

Table 4-9
Summary of Proposed BACT

Emission Unit	Pollutant	Proposed Emission Limit	Proposed Control Technology
Boilers	VOC	0.004 lb/MMBtu	Catalytic oxidation
	CO	0.035 lb/MMBtu on NG 0.040 lb/MMBtu on FO	Use of clean fuel and GCP
	GHG	675,343 TPY as CO_2e	Use of NG and fuel efficiency
Fuel Oil Storage Tanks	VOC	0.2 TPY [1]	White/Light color, submerged fill, and good maintenance
[redacted] Process Tanks	VOC	0.18 TPY [2]	Submerged fill
[redacted] Process Vent A	VOC	0.42 lb/hr [3] 4.2 TPY	Condensation
[redacted] Process Vent E	VOC	0.42 lb/hr [3] 1.8 TPY	Condensation
Emergency Generators	VOC	NO_X+NMHC of 6.4 g/kW-hr [4]	Good engine design and GCP
	CO	3.5 g/kW-hr [4]	Good engine design and GCP
	GHG	644 TPY as CO_2e per generator	Good engine design and GCP

Notes:
1. Total of both tanks.
2. Total of all four tanks.
3. Average emission rate for the batch
4. NSPS rate for emergency generators (Tier 2).

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554

TITLE V PERMIT APPLICATION
CURRENT EMISSIONS REQUIREMENTS AND STATUS

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name:	2. Emission source number
BAE Systems OSI, Holston Army Ammunition Plant	See process flow diagram

3. Describe the process emission source / fuel burning installation / incinerator.

Building [redacted] Recrystallization and Coating Processes

EMISSIONS AND REQUIREMENTS

4. Identify if only a part of the source is subject to this requirement	5. Pollutant	6. Applicable requirement(s): TN Air Pollution Control Regulations, 40 CFR, permit restrictions, air quality based standards	7. Limitation	8. Maximum actual emissions	9. Compliance status (In/Out)
All	VOC	TVEE Method 2	20% Opacity	N/A	IN
Recrystallization	VOC	TAPCR 1200-03-09-.01(4)(j)	0.42 lb/hr	N/A	IN
Recrystallization	VOC	TAPCR 1200-03-09-.01(4)(j)	4.2 TPY	N/A	IN
Coating	VOC	TAPCR 1200-03-09-.01(4)(j)	0.42 lb/hr	N/A	IN
Coating	VOC	TAPCR 1200-03-09-.01(4)(j)	1.8 TPY	N/A	IN
Tanks	VOC	TAPCR 1200-03-09-.01(4)(j)	0.2 TP	N/A	IN

10. Other applicable requirements (new requirements that apply to this source during the term of this permit)

11. Page number: Revision number: Date of revision:

This information is considered

CONFIDENTIAL BUSINESS INFORMATION

This information is considered

CONFIDENTIAL BUSINESS INFORMATION

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL

REQUEST FOR PROTECTION ORDER FOR CONFIDENTIAL INFORMATION

The Tennessee Air Quality Act, TCA 68-201-105(b)(2), grants the Department the authority to issue a protection order to prevent public dissemination of any secret formula, processes, or methods used in any manufacturing operation. The composition of air contaminants shall not be considered secret unless so declared by the Division of Air Pollution Control. Only information submitted on or as an attachment to this form will be considered for confidential treatment. Entire applications or similar documents will not be approved in total unless otherwise determined. Specific items of applications should be submitted as attachments for consideration. Information submitted on or attached to this form will be considered as confidential if approved. All disapproved information will be treated as confidential until 45 days from the date signed by the Director. If an appeal is received, information will be treated as confidential throughout the appeal period. For sources subject to the major source operating permit provisions at Division Rule 1200-3-9-.02(11), the confidential information provisions of subpart 1200-3-9-.02(11)(d)(iii) shall apply in reviewing the request for treatment of information as confidential.

1. Company Name BAE SYSTEMS Ordnance Systems Inc.

2. Company Address Holston Army Ammunition Plant
4509 West Stone Drive
Kingsport, Tennessee 37660

3. Brief Description of Material Requested for Coverage Under the Protection Order
The enclosed copy of Revision 1 provides supplemental information for Vent E at the Recrystallization and coating operation. These pages contain confidential information. A complete redacted copy of Revision 1 pages is provided for public viewing.

4. List Requested Confidential Information: (List form number, item number, and information. Items may be attached and identified by reference.)
OSI HSAAP Expansion Project 31 MAY 2018 - PSD Application CONFIDENTIAL Version - Revision 1 to clarify emission for Vent E - Pages 44-51, A-57, B-22, and B-24.

5. Authorized Signature [signature]

Signer's Name (Type or Print) Robert E. Winstead

Title BAE Systems HSAAP Director EHSS Date 13 August 2018

(continued on reverse)

For Division Use Only:

This request for a Protection Order is:

☐ Approved ☐ Disapproved ☐ **Granted in part as detailed below**

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Should you wish to appeal this administrative decision, your appeal will be handled in accordance with the provisions of the Tennessee Air Quality Act at TCA 68-201-108(a) and the contested case hearing provisions of the Uniform Administrative Procedures Act compiled in title 4, chapter 5, part 3. Your petition for appeal must be received within 45 days of the date below and must be addressed to the Director, Tennessee Division of Air Pollution Control, 9th Floor, L & C Annex, 401 Church Street, Nashville, Tennessee 37243-1531.

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Date

____

Director
Division of Air Pollution Control