



*Commonwealth of Virginia*

*VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY*

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David L. Bulova  
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus  
Director

**MEMORANDUM**

**To:** Michael Rolband, Director

**Through:** Trisha Beasley, Director of Operations *Trisha Beasley*  
Angie Jenkins, Director, Air Division

**From:** Trevor Wallace, Air Permit Manager, Valley Regional Office *TWall*

**Date:** May 21, 2026

**Subject:** Decision re: Requests for Public Hearing; State Operating Permit Issuance for Northrop Grumman Systems Corporation (Waynesboro)

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**Proposed Permit Action:** Issuance of Article 5, State Operating Permit, Registration No. 81917

**Applicant:** Northrop Grumman Systems Corporation

**I. Background**

Northrop Grumman Systems Corporation (Northrop Grumman), an aerospace and defense manufacturer, is constructing a manufacturing facility at 1001 Shenandoah Village Drive in Waynesboro, Virginia. The primary operations are to assemble and compile electronic components. Coatings will be applied to some electronic components, such as fiberglass or plastic circuit cards.

**II. Preparation of Draft State Operating Permit (with preceding Minor New Source Review Permit)**

On November 5, 2025, DEQ received a Form 7 application from Northrop Grumman requesting a minor New Source Review (NSR) construct and operate permit, and a federally enforceable State Operating Permit (SOP). The proposed emission units include spray coating, solvent recovery and consumption, woodworking, and fuel combustion. The SOP application was deemed technically complete on February 5, 2026.

With regard to processing the minor NSR application, the DEQ received on November 5, 2025, the Local Governing Body Certification and Site Suitability and Value forms asserting the facility is in compliance with applicable local ordinances and is suitable. The facility is located within 10 km of Shenandoah National Park (Class I area). Given this proximity, the application was provided to the Shenandoah National Park Federal Land Manager (FLM) for review. The FLM responded on November 17, 2025, that they did not have any comment on the application. In accordance with applicable regulations and guidelines, DEQ issued the requested minor NSR permit on March 13, 2026.

In addition to the minor NSR permit, Northrop Grumman requested a SOP to restrict the facility's maximum hazardous air pollutant (HAP) potential to emit (PTE) to 9.9 tons per year for any individual HAP and 24.9 tons per year total for combined HAP. Without these limits, the facility would be allowed to emit at higher rates. Per 9VAC5-80-1020 A, to be federally enforceable the SOP must be subject to a public comment period of at least 30 days.

### **III. Public Notice Publication**

The draft SOP public notice, which notified the local community of the public comment period, was published in the *News Virginian* on March 12, 2026. EPA was also notified immediately prior to the publication. The public notice, draft SOP, and engineering analysis were posted on the DEQ website for the duration of the public comment period, which ended on April 13, 2026.

### **IV. Permit Program Information**

Minor NSR permits are issued in accordance with 9VAC5, Chapter 80, Article 6, which is a preconstruction permit program that applies to new construction and projects at stationary sources that emit air pollutants. Minor NSR permits are issued because an activity at the source requires preconstruction permit approval and is not voluntary. If an activity requires a permit, emission unit construction and operation cannot occur unless a minor NSR permit has been issued.

State Operating Permits are issued in accordance with 9VAC5, Chapter 80, Article 5. The SOP program is significantly different from minor NSR because the scope is very limited. A facility may request an SOP for a number of reasons. One such reason is to be classified as a "synthetic minor source." That is, a source electively caps their emissions via enforceable permit limits and agrees to operate as a minor source, not a major source. An example scenario is when a source does not actually emit hazardous air pollutants (HAP) at rates that exceed federal major source thresholds, but without federally enforceable permit limits has a potential to emit (PTE) HAP above the thresholds. The source may already have state enforceable limits for toxics pollutants, but not federally enforceable limits for those pollutants, which are also regulated as federal HAP. By accepting and complying with the federally enforceable HAP permit limits, the facility would then be classified as a "synthetic minor source" with respect to federal HAP.

When a source requests synthetic minor status via an SOP, that is the sole scope of the SOP application and permit action. Only the emissions units and specific pollutants in the request may be regulated by that permit. The proposed SOP for Northrop Grumman will restrict and lower the facility's HAP emission potential via federally enforceable permit limits and classify the source as a synthetic minor.

### **V. Summary of Public Comments with DEQ Responses**

During the public notice period, DEQ received written (email and hardcopy) comments from 250 individuals. Of these, 218 requests for a public hearing were received, one of which was from a non-governmental organization (Chesapeake Climate Action Network) staff member. Among the total comments provided, two standard letters constituted 34 of the comments received and served as basis for many others. Excluded from these metrics are nine comments received after the close of the public comment period; seven of those requested a public hearing.

Provided below, as entries 1 through 15, are summaries of the comments received by DEQ.

#### **1. Public Process – Hearing Request, Comment Extension, Awareness, and Transparency**

Many commenters requested the comment period be extended an additional 30 days, noting

Shenandoah Valley communities are interconnected and broader awareness and time to respond are needed. Commenters stated that they were unaware of the draft permit until very late in the public comment period. There was general concern that notice was insufficient and that it was limited to only a single newspaper. Commenters noted that greater transparency and understanding of the air permitting process are needed and suggested the public hearing was necessary for environmental experts, medical and public health professionals, and national park advocates to address concerns.

**2. Facility location**

Commenters note that within ¼ mile of the plant are 352 planned senior apartments, a heavy concentration of shopping, dining, and neighborhoods. Within four miles there are three schools and a hospital. Coyner Springs, a municipal water supply and associated 145-acre recreational area with trails and a dog park, are less than ½ mile from the plant and the South River ½ mile further. The plant location puts all of these at risk of the highest toxic pollutant concentrations from the plant.

The proposed emissions will affect the entire Shenandoah Valley, the Blue Ridge Parkway, and the Shenandoah National Park.

Commenters expressed frustration and concern over the construction of the Northrop Grumman facility before obtaining necessary environmental permits. They criticized the lack of transparency and accountability from both the company and the local government (Waynesboro City Council), asserting that construction may have been expedited to avoid public scrutiny. Many emphasized the need for public hearings, stricter oversight, and more time for community input, arguing that the permit process should have been completed and publicly debated prior to construction.

**3. Construction vs. Permitting Timeline**

Commenters expressed frustration and concern over the construction of the Northrop Grumman facility before obtaining necessary environmental permits. They criticized the lack of transparency and accountability from both the company and the local government, asserting that construction may have been expedited to avoid public scrutiny. Many emphasized the need for public hearings, stricter oversight, and more time for community input, arguing that the permit process should have been completed and publicly debated prior to construction.

**4. Avoidance of Major Source Permitting / Requirements**

Commenters note that Northrop Grumman's permit appears intentionally structured to keep the facility classified as a "synthetic minor source", allowing the company to stay just below regulatory thresholds and thereby avoid the more rigorous oversight, monitoring, and pollution control requirements that apply to major sources. They noted that the emissions caps fall just under the limits that would trigger major source permitting, a designation they believe is warranted given the number and toxicity of the hazardous air pollutants listed in the permit. Several commenters described this as a regulatory loophole that places the community at risk, emphasizing that hazardous pollutants remain dangerous regardless of whether they fall just under a major source threshold. Commenters urged DEQ not to allow the facility to operate under a synthetic minor permit in such a densely populated and environmentally sensitive area, arguing that Northrop Grumman should be held to the higher standards, safeguards, and continuous monitoring required of a major source, rather than being permitted to avoid them through emissions "accounting."

5. **Human Health Impacts**

Commenters noted the facility is located near schools, senior apartments, hospitals, shopping centers, and residential neighborhoods, putting children, the elderly, and individuals with pre-existing health conditions at risk of exposure to HAPs and volatile organic compounds (VOCs). They further note the draft permit Attachment A list of HAPs are linked to respiratory issues, chemical sensitivities, developmental health concerns, neurological damage, and reproductive harm. Approximately 14 commenters expressed concerns regarding suffering from asthma or respiratory illness.

Concerns were raised about particulate matter and toxic emissions contaminating the air and water, particularly at Coyner Springs, a municipal water source, and the South River, which could impact drinking water quality and the broader ecosystem.

6. **Monitoring, Recordkeeping, and Reporting**

Commenters questioned the adequacy of monthly self-reporting and called for independent, third-party monitoring of air and water quality, public alerts for high emissions, and stricter enforcement to ensure transparency and permittee accountability. Some commenters requested that the source electively conduct quarterly environmental monitoring with public data sharing, public engagement, and implement robust environmental training. Commenters request that real-time air quality monitors be placed in nearby high-risk areas, including adjacent senior housing and residential areas, Coyner Springs Park, schools and hospitals, Shenandoah National Park, and the South River, with the data made publicly available.

Commenters noted that the facility could have an incident and still be in compliance because the emissions are calculated by monthly summation over a year's time and noted that a plan for dealing with violations should be outlined. They also requested DEQ strengthen oversight through more frequent unannounced inspections. Comments emphasized that meaningful enforcement is essential to protect public health and maintain trust, and requested accessible publication of compliance reports, deviations, enforcement actions, and monitoring data.

7. **Noise**

Commenters raised concerns about noise pollution from the facility, particularly from the large compressors used for climate control, and this impact on the surrounding areas and population. Requests were made for noise attenuation measures to minimize the impact on the surrounding community.

8. **Odor**

Commenters express concerns that odor from polysulfides and other chemicals may travel offsite and that the SOP provides no enforceable odor controls or monitoring. Commenters emphasize that Northrop Grumman's position that any potential polysulfide odors are not expected to travel beyond the property fenceline cannot be validated until the facility operates and odor impacts occur. Commenters note the efficacy of the charcoal filtration system for controlling odor producing chemicals like polysulfides is not guaranteed and lacks enforceable performance standards; request a formal odor management plan be required.

9. **Best Available Control Technology / Emissions Reduction**

Commenters request lower permit limits and note that Northrop Grumman should avoid pollution or find a workaround to mitigate impacts.

Commenters note the draft SOP does not require Northrop Grumman to install or operate Best Available Control Technology (BACT) or high efficiency emission controls typically expected for facilities using HAPs, and that the permit relies on administrative limits rather than physical pollution control equipment.

Commenters specified the facility should be required to use state of the art technologies commonly applied at similar industrial operations, including wet electrostatic precipitators (WESPs), regenerative thermal oxidizers (RTOs), and acid gas scrubbers, noting that such systems can eliminate 98–99% of HAP emissions. They commented that Northrop Grumman appears to be avoiding these technologies by seeking a “synthetic minor” classification rather than a major source permit, which would legally require more robust emission controls.

Comments noted that without BACT or continuous monitoring, the public has no assurance that the facility will prevent harmful short-term emission spikes or protect downwind sensitive locations such as senior housing, schools, and the municipal water supply at Coyner Springs.

**10. Emissions Modeling**

Commenters noted that the draft SOP includes no associated air dispersion modeling or explanation of how emissions will travel through surrounding neighborhoods, despite the plant’s proximity to homes, senior apartments, schools, shopping areas, recreation spaces, and the municipal water supply at Coyner Springs. Additionally, they noted that the permit does not indicate how emission plumes might migrate under different weather or terrain conditions. Commenters emphasized that without modeling, DEQ cannot accurately determine pollution concentrations at locations where vulnerable populations live, work, or play. Commenters noted that relying only on monthly emissions totals without modeling or real-time measurement makes it impossible to ensure compliance. Commenters requested DEQ require full dispersion modeling, public disclosure of the results, and clear, evidence-based assessment of downwind and downstream impacts before approving the permit.

**11. Shenandoah National Park Impacts and Federal Land Manager (FLM) Review**

Commenters noted the proposed facility poses risk to the nearby Shenandoah National Park, which is a Class I area, given the facility’s permitted emissions include volatile organic compounds (VOCs), which are precursors to haze. Comments noted that these pollutants could impact visibility and local tourism.

**12. Historic Lasting Pollution in Waynesboro**

Commenters reference Waynesboro’s history with industrial pollution stemming from past DuPont and General Electric operations. The South River mercury contamination that persists today, decades later, is notably emphasized. Commenters warned that allowing hazardous emissions from a new facility could repeat past mistakes and that Waynesboro cannot afford another long-term environmental disaster. Urge DEQ to apply heightened caution, greater transparency, and rigorous environmental protections. Requested that DEQ does not approve any more pollution in the community.

**13. Northrop Grumman Environmental Compliance Record**

Commenters express distrust of Northrop Grumman’s environmental compliance history in other locations, repeatedly citing its record of violations, penalties, and associated Superfund sites. Commenters emphasize that this history demonstrates a pattern of environmental negligence.

Reference is made to groundwater contamination in Bethpage, NY as evidence of a corporate culture that conceals contamination, delays cleanup, and resists accountability. Commenters note Northrop Grumman is not trustworthy as a self-monitoring entity. Many note that the company's prior environmental failures justify heightened scrutiny, independent monitoring, stricter safeguards, and a more cautious permitting approach.

**14. Water and Waste Permitting**

Commenters inquired if there will be a separate permit to consider the impact of these toxic substances to nearby waters and noted concerns regarding storage and disposal of HAPs and VOCs.

**15. State Operating Permit Denial**

While many commenters expressed strong opposition to issuing the SOP (e.g., "this isn't acceptable," "stop the pollution permit," "please do not allow them to operate"), several commenters directly state that the permit should be denied.

**VI. Public Hearing Criteria:**

A. According to the Virginia Regulations for the Control and Abatement of Air Pollution at 9VAC5-80-35 B, requests for a public hearing shall contain the following information:

1. The name and postal mailing or email address of the requester;
2. The names and addresses of all persons for whom the requester is acting as a representative; for the purposes of this requirement, a "person" includes an unincorporated association;
3. The reason for the request for a public hearing;
4. A brief, informal statement setting forth the factual nature and the extent of the interest of the requester or of the persons for whom the requester is acting as representative in the application or tentative determination, including an explanation of how and to what extent such interest would be directly and adversely affected by the issuance, denial, amendment, modification, or revocation of the permit in question; and
5. Where possible, specific references to the terms and conditions of the permit in question, together with suggested revisions and alterations of those terms and conditions that the requester considers are needed to conform the permit to the intent and provisions of the Virginia Air Pollution Control Law.

B. According to 9VAC5-80-35 C, upon completion of the public comment period on a permit action, the Director shall review all timely requests for public hearing filed during the public comment period on the permit action and within 30 calendar days following the expiration of the time period for the submission of requests shall grant a public hearing, unless the permittee or applicant agrees to a later date, if the Director finds the following:

1. That there is a significant public interest in the issuance, denial, amendment, modification, or revocation of the permit in question as evidenced by receipt of a minimum of 25 individual requests for a public hearing;

2. That the requesters raise substantial, disputed issues relevant to the issuance, denial, amendment, modification, or revocation of the permit in question; and
  3. That the action requested by the interested party is not on its face inconsistent with, or in violation of, the Virginia Air Pollution Control Law, federal law or any regulation promulgated thereunder.
- C. According to 9VAC5-80-35 E, the director may, in the director's discretion, convene a public hearing on a permit action.

**VII. Public Hearing Decision:**

DEQ will convene a public hearing in accordance with 9VAC5-80-35 E per Director of Operations, Trisha Beasley.

Approved: Trisha Beasley for  
Michael S. Rolband, PE, PWD, PWS Emeritus  
Director

Date: May 22, 2026