



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Summary of Public Comments and Responses

State Operating Permit, Registration No. 81917 Northrop Grumman Systems Corporation – Waynesboro

Two public comment periods were held, the first from March 12, 2026 through April 13, 2026, and the second from June 18, 2026 through July 23, 2026, on the proposed issuance of the State Operating Permit (SOP) for Northrop Grumman Systems Corporation – Waynesboro (Registration No. 81917). Verbal comments were also collected during the public hearing held on the draft permit on July 23, 2026, at the Waynesboro High School Auditorium in Waynesboro, Virginia. During the first comment period, written comments were received from 250 commenters, including one environmental, non-governmental organization. In the second comment period, comments were received from 143 commenters, including 4 environmental, non-governmental organizations. At the public hearing held on July 23, 2026, 55 individuals presented oral comments and 9 individuals submitted written comments. See Attachment 1 for a list of those who provided public comments.

All comments received by the Virginia Department of Environmental Quality (DEQ), from both comment periods and the public hearing, are summarized by topic in italicized text below. DEQ's responses to the comments associated with each topic follow the italicized text.

1. Public Comment – General

Many commenters request that DEQ address issues and include additional permit requirements or explanations regarding a wide variety of topics such as facility location, contamination of nearby surface and groundwater, impacts on the Shenandoah National Park or local tourism and businesses, and other general concerns regarding the facility. DEQ received multiple requests to require reduced SOP Condition 1 hazardous air pollutant emission limits (or zero emissions), a requirement for independent testing and monitoring (fenceline plus strategically nearby) with real-time publicly available emissions data and an alert system, that DEQ conduct air dispersion modeling, and the mandatory installation and operation of pollution control equipment.

DEQ Response

DEQ has several air permit programs that may apply to any particular facility. The most common permit program that applies is the minor new source review (minor NSR) program. Minor NSR is a preconstruction permit program that reviews new facilities or changes at facilities. This program implements requirements for best available control technology (BACT) and Virginia's toxic air pollutant regulation, similar to EPA's federal hazardous air pollutant (HAP) regulation. The minor NSR permit program also requires DEQ to receive information from the locality that shows the activity is properly zoned and is suitable to the location. Many of the comments pertain to DEQ's processing under minor NSR; therefore, the following information is provided for commenters.

Northrop Grumman submitted a permit application for a minor NSR permit on November 5, 2025. The required information from the locality, also dated November 5, 2025, was received with the application. DEQ reviewed the application and issued a minor NSR permit on March 13, 2026. The minor NSR permit requires Northrop Grumman to reduce particulate emissions by using a spray coating booth, operating filters, and limiting the cooling tower water dissolved solids concentration. The minor NSR permit also requires volatile organic compounds (VOC) to be reduced by using high volume low pressure (HVLP) spray coating guns, limiting VOC throughputs, and implementing work practices that minimize emissions.

DEQ also reviewed the facility's emissions of methyl isobutyl ketone (MIBK), toluene, and xylene, and issued limitations restricting emissions of these pollutants to less than associated exemption rates provided in the state air toxics regulations. The minor NSR permit specifies that other toxic pollutants may be used without additional permitting if, and only if, the emissions are exempt. This properly reflects the regulations, which provide that using a toxic pollutant exempt from regulation does not require action by DEQ. Northrop Grumman's application and proposed operations do not indicate they plan to emit mercury; emitting mercury was specifically noted as concerning to many commenters. The minor NSR permit also requires odors from using polysulfide compounds to be reduced by limiting their daily use and exhausting emissions through a charcoal system.

Federal Class I area Air Quality Related Value (AQRV) criteria are used for Prevention of Significant Deterioration (PSD) permitting review. The minor NSR program framework is designed to maintain the National Ambient Air Quality Standards (NAAQS). Class I AQRV evaluations (visibility, deposition, and flora/fauna impacts) are statutory requirements unique to PSD permit actions. Class I areas are areas of special national or regional natural, scenic, recreational, or historic value for which the PSD regulations provide special protection. The FLM is responsible for defining specific AQRV for an area and for establishing the criteria to determine an adverse impact on the AQRV.

In processing the minor NSR permit, DEQ provided the application to the Federal Land Manager (FLM) for consideration and comment. The FLM stated there were no concerns from this application with respect to Shenandoah National Park. DEQ annually prepares the Air Quality and Air Pollution Control Policies of the Commonwealth of Virginia Report for submission to the General Assembly by October 1. This report is available on the DEQ website (see Air Quality Reports) and details the status of Virginia's air quality, provides an overview of the air division programs, and briefly summarizes federal and state air quality programs. Information specific to Shenandoah National Park visibility is provided in the report. Also available on the DEQ website is the 2024 Virginia Ambient Air Monitoring Data Report, which is a compilation of air pollutant measurements made by the DEQ, the U.S. Department of Agriculture - Forest Service, the National Park Service, and the Environmental Protection Agency (EPA).

DEQ also has a permit program to issue state operating permits, or SOPs. The SOP program is the basis for this draft permit and for the public comment period at issue for this action; therefore, an explanation of the limitations of the program is provided below.

The SOP regulation, 9VAC5, Chapter 80, Article 5, restricts the authority DEQ can exercise within an SOP. SOPs apply to specific purposes and are limited to accomplishing those purposes.

With respect to the proposed Northrop Grumman SOP, 9VAC5-800C.1.a states that a facility can use a SOP to obtain synthetic minor status. Where a facility requests synthetic minor status, DEQ must process that application for that purpose; therefore, comments that do not pertain to the draft permit regarding the synthetic minor status of Northrop Grumman with respect to HAP major source thresholds are out of the scope of this action. The major source thresholds for HAP are: 1) less than 10 tons of any single HAP; and

2) less than 25 tons of total, combined HAP. Northrop Grumman submitted an application for these synthetic minor limits on November 5, 2025. DEQ reviewed the application and created the necessary permit conditions to ensure the facility will be a synthetic minor source with respect to HAP. The draft SOP includes HAP emission limits, with reciprocal monitoring and recordkeeping to ensure the DEQ can determine whether or not Northrop Grumman is in compliance with these limitations.

The draft SOP does not replace or alter the minor NSR permit requirements. Both permits will be independently enforceable for their respective conditions and purposes.

2. Public Comment – Extent of Impacts

Commenters indicated that the proposed emissions will affect the entire Shenandoah Valley, the Blue Ridge Parkway, and the Shenandoah National Park, and that “DEQ’s own permit summary acknowledges this reach”.

DEQ Response

DEQ produced a Hearing Decision Memo dated May 21, 2026, that provided background on the draft SOP. On May 28, 2026, the memo was provided to all people who provided written comments to DEQ during the draft SOP public notice period (March 12 to April 13, 2026). Section V of that memo summarized the public’s comments that DEQ received during that comment period. The memo Section V heading reads “Summary of Public Comments with DEQ Responses”. The heading is later followed by “Provided below, as entries 1 through 15, are summaries of the comments received by DEQ”. It is important to note that no DEQ responses, comments, or opinions are embedded within or immediately follow the individual topic summaries in the Hearing Decision Memo. In retrospect, the Section V heading should have only noted “Summary of Public Comments” as this appears to have caused some general misunderstanding; the potential confusion caused is noted by DEQ. The comment is addressed in other responses in this document.

3. Public Comment – Public Participation Process

Commenters expressed being unaware of the proposed permit, learning about it only shortly before the draft permit and/or the draft permit public hearing public comment deadline(s) and that public notice was insufficient and limited to only a single newspaper. Commenters requested the comment period(s) be extended, relating that Shenandoah Valley communities are interconnected and broader awareness and time to respond are needed. Commenters expressed concern that DEQ’s notification approach did not reach vulnerable groups, such as seniors, families, and residents without regular internet or newspaper access. Commenters requested more user-friendly public communication, including announcements on social media, local radio, or community bulletin boards. Commenters expressed that the SOP permitting and public participation process felt rushed, hasty, and not organized.

Commenters opined that greater transparency and understanding of the air permitting process are needed and suggested a public hearing was necessary for environmental experts, medical and public health professionals, and national park advocates to address concerns. Some commenters indicated a public hearing was needed to allow people to ask questions and receive answers in-person.

During the July 23, 2026, draft permit public hearing, commenters asserted the process lacked transparency, noted that Northrop Grumman was not attending or offering comment, and that environmental justice communities were not proactively informed or involved in the facility siting process.

DEQ Response

The SOP regulation (9VAC5-80-1020) establishes the requirements for public comment periods and public notice for proposed SOPs. 9VAC5-80-1020 A provides that proposed SOPs “shall be subject to a public comment period of at least 30 days.” 9VAC5-80-1020 B provides that public notices shall be made “by advertisement in at least one newspaper of general circulation in the affected air quality control region....” The public notice for Northrop Grumman’s proposed SOP was published in the *News Virginian*, which is the local newspaper serving Waynesboro and its surrounding area. The public notice ran on March 12, 2026, in both the print and online versions of the *News Virginian*. The public comment period opened on March 12, 2026, and closed on April 13, 2026, a total of 33 days. Accordingly, the public participation requirements of 9VAC5-80-1020 A and B were satisfied.

9VAC5-80-35 establishes the requirements for public hearings for controversial permits. The public hearing comment period was published in the *News Virginian* on June 18, 2026, in both the print and online versions, and closed on July 23, 2026, the date of the public hearing, for a total of 37 days.

In addition to these regulatory requirements, concurrent with and for the duration of the public comment periods, DEQ provided public notice along with a copy of the SOP and associated engineering analysis on the DEQ public website. Notice of the draft permit public hearing was also provided on the Virginia Regulatory Town Hall website. Regulations, 9VAC5-80-1020 (SOP) and 9VAC5-80-35 (public hearings), require public notices to be in a newspaper of general circulation, which the Virginia Code § 8.01-324 defines, and the *News Virginian* meets. During the comment period, all interested entities (e.g. citizens, local officials, the applicant) were given the opportunity to provide comments to DEQ. DEQ public hearings for controversial air permits provide an opportunity for individuals to provide oral comments for the administrative permit record. These public hearings do not provide for in-person question and answer dialogue.

4. Public Comment – Facility Location

Commenters noted that within ¼ mile of the plant are 352 planned senior apartments, a heavy concentration of shopping, dining, and neighborhoods. They further shared that within four miles there are three schools and a hospital. Additionally noted by commenters, is that 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. Commenters shared that the plant location puts all of these at risk of the highest toxic pollutant concentrations from the plant. Several commenters offered the facility “should never have been sited in the center of our community” and should instead be located in an existing industrial park or more remote zone. Commenters asserted that location decisions were made before the SOP public notice and without community input.

Commenters indicated the site is approximately six miles from the Shenandoah National Park, raising concerns about impacts to air quality, the viewshed, and pollution-sensitive ecosystems. One commenter noted that Interstate 64 already contributes to air pollution in the Waynesboro area and adding a facility permitted to emit hazardous air pollutants raises serious concerns about cumulative exposure. Several commenters stated that emissions plans were not disclosed early enough for the public or local government to influence the site selection.

DEQ Response

The Northrop Grumman facility location was considered during the completeness review of the minor NSR air permit application. Please see the DEQ Response to “1. Public Comment – General”, above. Following the NSR application completeness review, the DEQ considers the facility location when evaluating, in accordance with applicable regulations and guidance, the proposed emissions to ensure

ambient air quality standards are attained. As part of that review, 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.

5. Public Comment – Construction vs. Permitting Timeline

Commenters claimed construction of the Northrop Grumman facility occurred before obtaining the SOP and this represents a lack of transparency and accountability by the company, the local government (City of Waynesboro), and DEQ. Several commenters noted that better coordination between local government and DEQ permitting should have occurred to avoid emissions concerns arising after the building was erected. Some noted that construction may have been expedited to avoid public scrutiny, while others cited that the company unilaterally chose the site and started building without engaging the community or local stakeholders.

In response to the March 12, 2026, draft permit public notice, many commenters requested a public hearing and expressed that the proposed SOP should have been publicly debated prior to construction. Commenters indicated that public comment began after construction was well underway, thus limiting the value and impact of public input, such that relocating the facility would no longer be feasible due to construction progress. Concerns were shared that starting construction prior to permitting pressures DEQ into permit approval, regardless of community concerns, and that the company's construction timeline suggested an expectation that the SOP would be approved.

DEQ Response

Northrop Grumman informed DEQ that they did not construct the building they occupy and are leasing the space for their planned operations. Northrop Grumman received their minor NSR permit on March 13, 2026. The draft SOP provides for the requested synthetic minor status for HAP. The DEQ has not received notice from Northrop Grumman that they have commenced emission unit construction. In accordance with the minor NSR permit, this notification is required within 30 days after commencing construction along with the anticipated facility start-up date.

6. Public Comment – Avoidance of Major Source Permitting / Requirements

Commenters expressed 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 HAP major source regulatory thresholds and thereby avoid more rigorous oversight, monitoring, and pollution control requirements. They noted that the SOP Condition 1 HAP emission limits are just under the 10/25 tons per year thresholds what would trigger major source permitting, a designation they assert is warranted given the number and toxicity of the hazardous air pollutants listed in the permit.

Commenters stated the SOP Condition 1 HAP limits of 9.9/24.9 tons per year represent regulatory circumvention or a loophole that allows for less stringent permit requirements. Commenters asked DEQ not to allow the facility to operate as a synthetic minor source, asserting that if classified as a major source, Northrop Grumman would be held to more stringent permit requirements, such as air-dispersion modeling, best available control technology (BACT), continuous emissions monitoring, and enforceable operating limits.

DEQ Response

Please see the DEQ Response to "1. Public Comment – General", above. Northrop Grumman requesting and voluntarily accepting HAP emission limits that are less than major source thresholds is not regulatory circumvention. Facilities accepting legally enforceable permit limits to ensure they remain below major source thresholds, for both HAP and criteria pollutants, is envisioned within DEQ's air permitting

programs and is a mechanism that has provided additional emissions reductions across DEQ's air permitting programs.

7. **Public Comment – Environmental Justice (EJ) and Cumulative Impact Analysis**

Commenters asserted that the proposed emissions would disproportionately burden environmental justice communities with elevated asthma rates, legacy pollution, and socioeconomic challenge, contrary to the intent of Virginia's Environmental Justice Act. Commenters stated that "DEQ's own environmental justice screening tool identifies this facility as sited within an environmental justice community, bordered on two additional sides by environmental justice communities". Commenters expressed that DEQ failed to conduct a required environmental justice review or provide meaningful involvement for environmental justice communities. Commenters requested a cumulative impact and environmental justice analysis.

DEQ Response

The Virginia Environmental Justice Act (VEJA), §§ 2.2-234 and 2.2-235 of the Code of Virginia, established the policy for the Commonwealth, which is "to promote environmental justice and ensure that it is carried out throughout the Commonwealth, with a focus on environmental justice communities and fenceline communities." In addition to this policy statement, VEJA defines key terms related to environmental justice. However, VEJA does not include a process or a requirement for "environmental justice review." In addition, in 2022, DEQ developed Virginia EJScreen+; it is a mapping tool the public can use to identify low income and communities of color (both terms are included in the definition of an environmental justice community, per VEJA). However, this mapping tool does not indicate whether a proposed permit cannot be issued, nor does the tool establish that a proposed permit will result in a group of people bearing a disproportionate share of any negative environmental consequence (the VEJA definition of "fair treatment").

In an effort to interpret VEJA, in 2023, DEQ developed a draft environmental justice in the permitting process guidance document, but that document was not finalized and did not become effective. The draft guidance proposed that select projects, defined as "Permits of Concern," undergo additional analysis if they were proposed to be located in an environmental justice community. "Permits of Concern" included activities which, based on DEQ's experience, were often the focus of community interest due to their potential environmental impacts. If the draft 2023 guidance was in effect, the proposed SOP would not fall under the Permits of Concern definition, and thus no additional analysis would have been required.

Separate from the draft environmental justice guidance, it is important to clarify how the proposed SOP fits within DEQ's permitting framework and has different requirements than the minor NSR permit. As discussed in the DEQ Response to "1. Public Comment – General", above, the proposed SOP is not a pre-construction permit and should not be confused with the minor NSR permit that was issued to Northrop Grumman on March 13, 2026. The location for the Northrop Grumman facility was considered as part of that minor NSR permitting process, not the proposed SOP. The issued, minor NSR permit addresses the source's air pollutant and emissions control requirements and requires Northrop Grumman to reduce (1) particulate emissions by using a spray coating booth, operating filters, and limiting the cooling tower water dissolved solids concentration, and (2) VOC by using HVLP spray coating guns, limiting VOC throughputs, and implementing work practices that minimize emissions.

Whereas the proposed SOP will further lower and limit Northrop Grumman's potential HAP emissions, which is in accordance with the SOP and DEQ's non-regulatory pollution prevention goals. DEQ's Pollution Prevention goals are voluntary initiatives, such as the Virginia Environmental Excellence

Program (VEEP) and Virginia Green, to help businesses, institutions, and communities go beyond environmental regulatory compliance. Through VEEP, DEQ can engage businesses, like Northrop Grumman, to minimize environmental impacts that are not otherwise required by environmental regulations. Northrop Grumman filed this SOP application to voluntarily accept HAP emission limits that are less than major source thresholds. In other words, the SOP permit is an elective permit requested by the facility to take enforceable limits (emission caps) on its potential to emit federal HAPs.

Note that in 2026, the General Assembly enacted Chapter 461 of the 2026 Acts of Assembly (HB 1266), which requires DEQ to update the 2023 draft environmental justice guidance and issue a final document by December 31, 2026. This guidance document, which must explicitly consider how to assess the cumulative impacts of the types of permits covered in the guidance memo, once it becomes effective, will govern DEQ's future permitting actions.

Lastly, DEQ provided opportunities for public involvement regarding the proposed SOP by offering two written comment periods, holding a public hearing at the Director's discretion, and considering public comments and developing this response document. For additional details, see DEQ Response to "3. Public Comment – Public Participation Process."

8. Public Comment – 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. Multiple commenters expressed concerns regarding suffering from asthma, respiratory, or other illnesses, and that the HAP emissions could worsen these health conditions, especially in children, the elderly, and other sensitive sub-groups.

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.

Commenters shared that cumulative impacts from existing pollution, valley air-trapping conditions, past industrial contamination, and multiple overlapping stressors make any additional emissions a serious threat to community health. Commenters expressed concern about "repeating past mistakes" and adding pollution burdens to the region. Additional pollution sources mentioned include, historic Dupont mercury contamination, Interstate 64 vehicle emissions and other "nearby industrial sources".

DEQ Response

The draft SOP serves to restrict Northrop Grumman's ability to emit HAP, and results in synthetic minor status for HAP as requested in the application dated November 5, 2026.

Northrop Grumman accepted minor NSR permit limits to restrict their state toxic air pollutant emissions to less than exemption rates provided in 9VAC5-80-300 C (i.e. by regulation these rates need no further regulation). Emission limits placed in minor NSR permits are written to be enforceable as a practical matter, meaning they are supported by monitoring, recordkeeping, and reporting requirements.

Toxic air pollutant emissions are evaluated in accordance with 9VAC5, Chapter 60, Article 5 (Rule 6-5) and 9VAC5, Chapter 80, Article 6. Rule 6-5 ("Emission Standards for Toxic Pollutants from New and Modified Sources") provides a health-based framework for evaluating toxic pollutant emissions and is

incorporated into the minor NSR permit review via 9VAC5-80-1105 E. Rule 6-5 contains the basis for determining whether a source's potential to emit (PTE) for a particular toxic air pollutant is low enough to qualify for an exemption or whether further analysis (i.e. modeling) and application of best available control technology are required.

DEQ reviews the source's worst-case PTE to ensure compliance under full capacity operations (i.e., permitted worst-case emission rates). If the source's PTE for a toxic pollutant exceeds the exemption level, a Rule 6-5 toxic pollutant analysis is conducted, including air dispersion modeling using emission rates equal to the source's PTE, to predict ambient concentrations. Those modeled concentrations are then compared to the Significant Ambient Air Concentration (SAAC) thresholds, which specify hourly and annual health-protective benchmarks.

If the source's PTE for a toxic air pollutant does not exceed respective exemption levels, meaning the mass emissions are less than the short-term and long-term exemption rates directly derived from Rule 6-5, the emission rates, by regulation, do not require best available control technology or modeling. Because Northrop Grumman's emission rate for MIBK approaches associated exempt rates, enforceable requirements were added to the minor NSR permit to ensure adequate protections are in place and the exempt emission rates are not exceeded. This draft SOP does not alter the minor NSR permit requirements.

9. Public Comment – Impacts to Local Business and Tourism

Commenters expressed concern that odors, air pollution, and visible emissions from the proposed facility could impact Waynesboro's appeal to visitors, especially those drawn to nearby natural attractions like Coyner Springs Park and the Shenandoah National Park. Commenters suggested that Northrop Grumman's proposed emissions will degrade Waynesboro's natural assets, thus harming tourism that depends on outdoor recreation and scenic beauty.

DEQ Response

Please see the DEQ Response to "1. Public Comment – General", above.

The Clean Air Act requires EPA to set primary National Ambient Air Quality Standards (NAAQS) at a level to protect public health with an adequate margin of safety. EPA sets the NAAQS after reviewing the available scientific information on the health impacts for each criteria pollutant. EPA then follows a regulatory process to promulgate (or make final) the NAAQS, accepting comments and any accompanying information from any member of the public.

Two key components of the NAAQS development process are the Integrated Science Assessment (ISA) and the Risk/Exposure Assessment (REA). The ISA is a comprehensive review, synthesis, and evaluation of the most policy-relevant science, including key science judgments that are important to inform the development of the risk and exposure assessments, as well as other aspects of the NAAQS review. The REA draws upon information and conclusions presented in the ISA to develop quantitative characterizations of exposures and associated risks to human health or the environment associated with recent air quality conditions and with air quality estimated to meet the current or alternative standard(s) under consideration. This assessment includes a characterization of the uncertainties associated with such estimates. The resulting final NAAQS is protective of all people, including any sensitive groups, as required and promulgated pursuant to the Clean Air Act. Each NAAQS is then reviewed and changed/revalidated every five years, following the same process of scientific review, using up-to-date information, and the regulatory process including public participation.

Virginia's new source review permitting regulations (such as 9VAC5 Chapter 80, Article 6, under which Northrop Grumman's minor NSR permit was issued) were developed and approved by EPA to ensure that air quality within Virginia meets the NAAQS.

10. Public Comment – SOP 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 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. Commenters 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. Commenters opined that relying on self-monitoring at "just-under-threshold" levels creates a high risk of limit exceedances and the potential for serious impacts if exceeded.

DEQ Response

This SOP is to ensure synthetic minor status for HAP, which is an annual (12-month period) threshold. All portions of the draft permit serve that purpose. Compliance with annual emission limits must be demonstrated monthly via a 12-month rolling total. This method is an established regulatory approach used statewide and nationally for the practical enforceability of annual limits. Each month, the facility must calculate emissions for the most recent 12-month period and maintain records demonstrating that the rolling total remains below the applicable permit limits. These records are enforceable and must be made available to DEQ during inspections or upon request.

Monthly recordkeeping and rolling 12-month total calculations do not replace oversight by DEQ. Rather, they are part of a broader compliance framework that includes required monitoring, recordkeeping, and reporting, as well as DEQ's independent compliance evaluations. DEQ conducts routine unannounced inspections to verify the accuracy of reported information and to ensure that operations and emissions remain consistent with permit conditions. Deviation from reporting requirements is reviewed for permit violation and subject to enforcement action.

All synthetic minor sources are annually required to report their emissions to DEQ via an Annual Update report. DEQ compliance staff review all Annual Update reports for accuracy and permit limit compliance. If exceedances occur or questions arise, compliance staff engage with the source; if a violation is discovered, compliance staff refer the matter for enforcement resolution.

DEQ understands that some commenters view self-reported data as insufficient. The monitoring, recordkeeping, and reporting requirements included in the draft permit meet the regulatory standards necessary to ensure compliance and provide DEQ with the information needed to evaluate the facility's performance.

DEQ's ambient air monitoring network is developed, sited, and operated in accordance with the federal requirements of 40 CFR Part 58, which establishes uniform national criteria for monitor placement, quality assurance, data collection, and public reporting. The current monitoring network for Virginia has been developed following the requirements of 40 CFR Part 58 and applying EPA's guidelines for network design and site exposure. The adequacy of the network is reviewed annually by the DEQ Office of Air Quality Monitoring. These requirements ensure that Virginia's monitoring network provides representative regional air quality data consistent with federal standards. The placement of state-operated monitors must comply with these federal siting criteria and cannot be adjusted solely in response to a single facility or permit action. For more information regarding air monitoring, such as air monitoring station locations and associated data, please visit the DEQ website and navigate to Air Monitoring.

DEQ operates three water quality monitoring stations on the South River; each is located less than 3.5 miles from the facility. Samples from each monitoring station are collected and analyzed based on a monitoring strategy, and the data is readily available to the public. Additional information for the 2026 Ambient Water Quality Monitoring Plan is available on DEQ's website.

DEQ remains committed to ensuring that all permitted facilities operate in compliance with applicable emission limits and monitoring requirements. DEQ issues all air permits in accordance with applicable laws and regulations and diligently evaluates for permit compliance via (but not limited to) inspections, data review, and enforcement mechanisms to ensure that emissions remain protective of public health and the environment.

11. Public Comment – Incomplete Permit Record Provided

Commenters shared that the public should have access to the complete permitting record, noting the engineering analysis references conditions contained in a minor NSR permit that includes operating restrictions, best available control technology, solvent recovery requirements, odor controls, and throughput restrictions. Commenters noted that those conditions are not included in the materials available for public review, and thus the public is being asked to comment on only part of the regulatory framework governing the facility. Commenters expressed that meaningful public participation requires that the public have access to the same information DEQ relied upon in developing its technical conclusions. They further asserted that without the referenced minor NSR permit, it is impossible to determine whether the engineering analysis accurately reflects enforceable permit requirements.

DEQ Response

Requiring and issuing a minor NSR permit for a coating operation is standard. There are many permitted, and some exempt by regulation, coating operations in Virginia. In accordance with applicable regulations, DEQ issued the requested minor NSR permit on March 13, 2026. The public notice for this draft SOP provided contact information to request additional documentation, such as the March 13, 2026, minor NSR permit. All requested documents were provided, including the minor NSR permit even though that permit is not the subject of this comment period.

With minor NSR permit evaluations, DEQ reviews applicability of other potential air programs, such as Major NSR and Title V. The SOP program is most typically an elective permit requested by the source to take enforceable limits on their potential to emit federal HAP. Federal HAP emission limits are not implemented within minor NSR permits but rather are specifically permitted under the SOP program. All records maintained by the DEQ are available to the public via a Freedom of Information Act (FOIA) request. Requests can be submitted through the DEQ NextRequest Portal: <https://vadeq.nextrequest.com/>

12. Public Comment – Best Available Control Technology / Emissions Reduction

Commenters request lower SOP HAP 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. Commenters opined that a multi-billion-dollar corporation should be obligated to use state-of-the-art pollution-control equipment to minimize HAP and VOC emissions.

Commenters 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 Coyner Springs municipal water supply.

DEQ Response

Northrop Grumman’s minor NSR permit and BACT applicability review included evaluation of all potential particulate matter (PM, PM10, PM2.5), volatile organic compounds, and toxic pollutants. Please see the DEQ Response to “1. Public Comment – General”, above. Pollution control requirements and emission limitations were established in accordance with the applicable regulatory requirements. These limits reflect the level of control determined to be BACT for the specific emission units and processes proposed.

Commenters suggested that the facility should be required to install state-of-the-art add-on control technologies commonly used at large industrial operations handling HAPs. BACT determinations are based on the specific pollutants subject to review. Northrop Grumman’s minor NSR permit establishes operational limitations, add-on controls, and operating practices designed to limit emissions. Northrop Grumman is legally bound to operate within those limits.

Regarding concerns about monitoring and public assurance, Northrop Grumman’s SOP includes enforceable monitoring, recordkeeping, and reporting requirements sufficient to demonstrate ongoing compliance with established emission limits. DEQ conducts inspections to determine compliance with the permit conditions. If monitoring, reporting, or operational information indicates noncompliance with the permit, DEQ may take enforcement action, including but not limited to penalties and corrective measures.

13. Public Comment – 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 Coyner Springs. Additionally, they noted that the permit does not indicate how emission plumes might migrate under different weather or terrain conditions. Commenters assert that Waynesboro’s valley geography and history of industrial pollution make modeling essential to understanding cumulative exposures.

Commenters offered that without modeling DEQ cannot accurately determine pollution concentrations at locations where vulnerable populations exist. Commenters opined that relying only on monthly emissions totals without modeling or real-time measurement makes it impossible to ensure compliance. Commenters requested DEQ require dispersion modeling, public disclosure of the results, and clear, evidence-based assessment of downwind and downstream impacts before approving the permit.

DEQ Response

The sole purpose of the requested SOP is to establish federally enforceable limits for individual and total HAP that are less than amounts that would otherwise be allowed. The SOP will further lower and constrain the facility's potential emissions and classify the source as a synthetic minor for federal HAP. Dispersion modeling is not related to this purpose. In issuing the minor NSR permit, DEQ reviewed the permitted emissions and determined they were below established thresholds for dispersion modeling. Northrop Grumman's proposed emission rates do not exceed the 9VAC5-60-300 C toxic air pollutant exemption thresholds or the 9VAC5-80-1110 criteria pollutant significant emission rates.

14. Public Comment – Historic Lasting Pollution in Waynesboro

Commenters pointed out Waynesboro's history with industrial pollution stemming from past DuPont and General Electric operations, highlighting the South River mercury contamination that persists decades later requiring a local fish consumption advisory. Commenters warned that allowing hazardous emissions from a new facility could repeat past mistakes and undermine years of environmental recovery in the area, especially the South River restoration efforts.

Commenters opined that pollution from Northrop Grumman will settle into soil and groundwater, creating long-term bioaccumulation similar to the South River mercury pollution, and that Coyner Springs, a municipal water source, will suffer lasting contamination. Commenters remarked that Waynesboro cannot afford another long-term environmental disaster and asked DEQ to apply heightened caution, greater transparency, rigorous environmental protection, and to not approve any more pollution in the community.

DEQ Response

DEQ is committed to ensuring that any permitted activity does not contribute to unacceptable environmental or public health risks and that communities, such as Waynesboro, are protected from preventable pollution in accordance with all federal and state air pollution control laws and regulations.

15. Public Comment – Northrop Grumman Environmental Compliance Record

Commenters shared concern given Northrop Grumman's environmental compliance history in other locations; they repeatedly cite a record of violations, penalties, associated Superfund sites, and consideration as a top corporate air polluter based on 2008 national Toxics Release Inventory air pollution data. Commenters note this history demonstrates a pattern of environmental negligence. Commenters express concern that similar contamination events could occur in Waynesboro, resulting from Northrop Grumman's operations. Commenters opined that the company's prior environmental failures justify heightened scrutiny, independent monitoring, stricter safeguards, and a more cautious permitting approach. Concern was shared that Northrop Grumman may pollute and pay fines rather than preventing environmental harm, and that Virginia must do better.

DEQ Response

DEQ acknowledges the concerns raised regarding Northrop Grumman's environmental compliance record at facilities in other states, including references to violations, enforcement actions, and long-term contamination issues. DEQ understands that these past incidents contribute to community concern.

DEQ's permitting decisions are based on regulations governing the specific request and the applicant's ability to meet all applicable state and federal air pollution requirements. All permitted facilities in Virginia are subject to enforceable emission limits, supported by appropriate monitoring, recordkeeping, reporting, testing, unannounced compliance evaluations, and enforcement. Any violation of permit conditions is subject to enforcement action, including penalties and corrective requirements.

DEQ remains committed to applying consistent, enforceable requirements to all facilities operating in Virginia, irrespective of activities in other states.

16. Public Comment – Noise

Commenters raised concerns about continual noise pollution from the facility, particularly from the large compressors used for climate control and the adverse impact that this would have on the surrounding areas and population. The area was noted by commenters for its quiet and natural surroundings. Requests were made for SOP required noise attenuation measures to minimize the impact on the surrounding community.

DEQ Response

Noise is not a regulated air pollutant, but rather, is a factor that the local government may consider when establishing the zoning for a parcel and/or when issuing a Special Use Permit (SUP) for a specific use for a parcel.

17. Public Comment – Odor

Commenters expressed concern that odor from polysulfides and other chemicals may travel offsite and that the SOP provides no enforceable odor controls or monitoring. Commenters opined that Northrop Grumman's comment 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, and that the efficacy of the carbon filtration system for controlling odor-producing chemicals like polysulfides does not guarantee that odors will not leave the property. Commenters request there be a formal odor management plan, including clear corrective actions when odors are detected off-site.

DEQ Response

In Virginia, objectional odors from stationary sources of air pollutant emissions are regulated at the state level (i.e. state-only enforceable). Northrop Grumman's minor NSR permit includes state-only enforceable limits specifically written to address potential odor when using polysulfide compounds. The facility will restrict daily use and exhaust associated operating space air through a carbon filtration system. Should objectional odors from Northrop Grumman be detected off-site, the objection may be filed with the Virginia DEQ Valley Regional Office Air Compliance Manager for review and investigation. Additional odor control measures beyond the current minor NSR permit requirements can be imposed, if needed for compliance with the odor regulations (Rule 5-2 or 9VAC5-50-130 *et seq.*).

18. Public Comment – Water and Waste Permitting

Commenters inquired if there will be other permits that consider impacts to nearby waters and shared concerns regarding the storage and disposal of HAPs and VOCs. They noted the SOP does not include a framework or safeguards to address these issues.

DEQ Response

Wastewater generated by the facility will be discharged to the Waynesboro WWTP, which is authorized to discharge treated wastewater in accordance with VPDES Permit No. VA0025151 that contains requirements for a Pretreatment Program (PT). The PT requires the Waynesboro WWTP to identify

Significant Industrial Users (SIUs) that discharge to their collection system and ensure all SIUs are issued PT permits that include limits and monitoring requirements for the SIUs' wastewater prior to discharge to the collection system.

The Northrop Grumman facility may be required to obtain a VPDES General Permit for Stormwater Discharges Associated with Industrial Activity if the facility has a stormwater discharge that is directly related to manufacturing, processing, or raw materials storage areas at an industrial plant.

A material becomes a solid or hazardous waste once that material is discarded. The Virginia Solid Waste Management Regulations may apply if a facility treats, stores, disposes or manages the solid waste at the site. For any solid waste that is generated and discarded, a facility will need to determine whether any of that waste is a hazardous waste, and then properly manage, store and dispose of that waste, under the Virginia Hazardous Waste Regulations.

Northrop Grumman's minor NSR permit includes VOC work practice standards requiring proper equipment operation and VOC storage, handling, and disposal measures that are consistent with air pollution control practices for minimizing emissions. All such measures are subject to DEQ air compliance inspection.

19. Public Comment – Support SOP Issuance

One commenter supported approving the permit, while enforcing every part of it, and noted that air permit programs like the SOP exist because of historic pollution to provide limits, scrutiny, and oversight that earlier industries never had. The commenter shared that the permit includes clearly defined limits, federally enforceable requirements, and oversight mechanisms. The commenter noted that all emission units were analyzed, capped, and subject to rolling 12-month federally enforceable records.

An accounting of Northrop Grumman's potential to emit particulate matter, VOC, and HAP were offered. Also noted was that the National Park Service reviewed the application, raised no objection, and the DEQ imposed strict visible emissions limits due to the nearby Shenandoah National Park. The commenter pointed out DEQ's authority to inspect at any time and suspend the permit if limits or requirements are violated.

DEQ Response

The draft SOP is written in accordance with all applicable air pollution rules and guidelines.

20. Public Comment – State Operating Permit Denial

Some commenters explicitly state that the draft SOP should be denied. As basis for denial, commenters specifically pointed to the draft permit's proposed 9.9/24.9 tons per year HAP emission limits and stated a preference for not allowing any amount of HAP into the environment; need for clear, truthful, science-based answers; the current SOP framework; insufficient monitoring; no emissions modeling; a desire to protect the area from further contamination; and the permit should have been requested prior to construction.

DEQ Response

The sole purpose of the requested SOP is to establish federally enforceable limits for individual and total HAP emissions. The SOP will classify the facility as a synthetic minor for federal HAP and further restrict state toxic air pollutant emissions, which are also separately regulated as federal HAP.

In the preceding responses, details of the SOP program and Northrop Grumman's request relative to the program are provided. Although entirely separate from the SOP and this public participation opportunity, information regarding the specifics of the minor NSR permit program and other information are also provided in response to various commenter concerns. These details demonstrate full adherence to all applicable SOP program requirements. DEQ cannot deny a permit that meets the applicable regulatory requirements.

Attachment 1: Commenter Listing

Table 1: Comments Received During the Draft Permit Public Comment Period

**Draft Permit Public Comment Period
March 12, 2026 - April 13, 2026**

Name or Organization	Method	Date Received	Request for Hearing
Acton, Patricia	Email	4/12/2026	No
Addington, Joni	Email	4/13/2026	Yes
Addington, Mike	Email	4/13/2026	Yes
Adler, Kristina	Email	4/11/2026	Yes
Albrecht, Ann	Email	4/12/2026	Yes
Amos, Rebekah	Email	4/13/2026	Yes
Andrake, Lara	Email	4/9/2026	Yes
Arcidicono, Christine	Email	4/13/2026	Yes
Arehart, Kathryn	Email	4/12/2026	Yes
Armstrong, Deborah	Email	4/12/2026	Yes
Artz, Kim	Email	4/12/2026	Yes
Badgett, Kendall	Email	4/13/2026	Yes
Bauders, Windsor	Email	4/11/2026	Yes
Beard, Kim	Email	4/7/2026	Yes
Beasley, Teri	Email	4/8/2026	Yes
Benson, Karen	Email	4/12/2026	Yes
Benzing, Tom	Email	4/13/2026	Yes
Biscay, Andrea	Email	4/12/2026	Yes
Blair, Marianne	Email	4/13/2026	Yes
Bohannon, Beth	Email	4/11/2026	Yes
Boyd, Lauren	Email	4/12/2026	Yes
Bradford, Carol	Email	4/12/2026	Yes
Branch, Steve	Email	4/13/2026	No
Bratcher, Richard	Email	4/13/2026	Yes
Brick, Jessye	Email	4/11/2026	Yes
Brookins, Elizabeth	Email	4/13/2026	Yes
Buczynski, Sarah	Email	4/11/2026	Yes
Call, Victoria	Email	4/12/2026	Yes
Caminati, Lauren	Email	4/11/2026	Yes
Cardozo, Marianna	Email	4/12/2026	Yes
Carpenter, Sandra	Email	4/11/2026	Yes
Carroll, Patty	Email	4/11/2026	Yes
Carver, Kathryn	Email	4/12/2026	Yes
Cash, Keely	Email	4/13/2026	Yes
Centeno, Brittany	Email	4/6/2026	Yes
Cerminara, Katie	Email	4/12/2026	Yes
Chaldares, Brian	Email	4/13/2026	Yes
Chaldares, Leah	Email	4/13/2026	Yes
Chaldares, Diane	Email	4/13/2026	Yes
Collins, Zac	Email	4/8/2026	Yes
Cook, Joy	Email	4/10/2026	Yes

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March 12, 2026 - April 13, 2026**

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Copper, David	Email	4/13/2026	Yes
Covey, Carrie	Email	4/11/2026	Yes
Covington, Claire	Email	4/12/2026	Yes
Coyner, Jessica	Email	4/10/2026	Yes
Coyner, Mary	Email	4/10/2026	Yes
Craig, Matthew	Email	4/9/2026	Yes
Crawford, Emmett	Email	4/11/2026	Yes
Cromwell, Elizabeth	Email	4/10/2026	Yes
Curcio, Milio	Email	4/12/2026	Yes
Danson, Jenna	Email	4/10/2026	Yes
Davis, Noelle	Email	4/13/2026	Yes
DeCourcy, Jamison	Email	4/13/2026	Yes
Derrick, Steven	Email	4/12/2026	Yes
Derrick, Susanne	Email	4/11/2026	Yes
Dickerson, Andrew	Email	4/8/2026	Yes
Drummond, Meghan	Email	4/11/2026	Yes
Eastridge-Lowry, Rebecca	Email	3/31/2026	Yes
Emanuel, Jennifer	Email	4/8/2026	Yes
Embach, Jessica	Email	4/11/2026	Yes
Ennis, Barbara	Email	4/13/2026	Yes
Fabrizi, Sherry	Email	4/12/2026	Yes
Farris, Jane	Email	4/9/2026	Yes
Ferguson, Erin	Email	4/9/2026	Yes
Fiederlein, Suzanne, Ph.D.	Email	4/13/2026	No
Flory, Will	Email	4/3/2026	Yes
Frantz, Shauna	Email	4/8/2026	Yes
Freeman, Debra	Email	4/8/2026	Yes
Frost, Holly	Email	4/10/2026	Yes
Funk, Samuel	Email	4/13/2026	No
Fust, Jordan	Postal Mail	4/13/2026	Yes
Gale, Dorcas	Email	4/13/2026	Yes
Gamble, Sam	Email	4/12/2026	Yes
Gelly, Cordelia	Email	4/8/2026	No
Genda, Melinda	Email	4/13/2026	Yes
George, Kathleen	Email	4/13/2026	Yes
George, Lisa	Email	4/12/2026	Yes
Gilliam, Kathy	Email	4/12/2026	No
Godshall, Tim	Email	4/12/2026	Yes
Graham, Chris	Email	4/13/2026	Yes
Graves, Rude	Postal Mail	4/13/2026	Yes
Grimm, Mary	Email	4/11/2026	Yes

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**Draft Permit Public Comment Period
March 12, 2026 - April 13, 2026**

Name or Organization	Method	Date Received	Request for Hearing
Gunter, Jane	Email	4/11/2026	Yes
Gunter, James	Email	4/11/2026	Yes
Gurkin, Hailey	Email	4/9/2026	Yes
Hall, Tina	Email	3/26/2026	N
Hall, Hunter	Email	4/13/2026	Yes
Hall, Jenna	Email	4/13/2026	Yes
Hallquist, Danielle	Email	4/11/2026	Yes
Hamel, Rachel	Email	4/13/2026	Yes
Hanigosky, Taylor	Postal Mail	4/13/2026	Yes
Hardesty, Cameron	Email	4/11/2026	Yes
Harlow, Brent	Email	4/12/2026	Yes
Harman, Emily	Email	3/26/2026	No
Harper, Ariel	Email	4/6/2026	No
Harris, Jami	Email	4/13/2026	Yes
Harris, Wyatt	Email	4/13/2026	Yes
Hashagen, Jeanne	Email	4/13/2026	Yes
Hatter, Kate	Email	4/11/2026	Yes
Hayward, Sarah	Email	4/13/2026	Yes
Heebner, Samantha	Postal Mail	4/13/2026	Yes
Heisey, Daniel	Email	4/13/2026	Yes
Hewitt, Amy	Email	4/12/2026	Yes
Hewitt, Sam	Email	4/12/2026	Yes
Hicks, Jennifer	Email	4/13/2026	Yes
Hill, Heidi	Email	4/8/2026	Yes
Hoemann, Cora	Email	4/12/2026	Yes
Hughes, Allen	Email	4/10/2026	No
Hughes, George	Email	4/13/2026	No
Hutcherson, Amy	Email	4/11/2026	Yes
Irving, Kim	Email	4/12/2026	Yes
Itchuaqiyag, Cana	Postal Mail	4/12/2026	Yes
Jackman, Diane	Email	4/13/2026	Yes
Jensen-Wachspress, Ariana, MPH	Email	4/12/2026	Yes
Johnson, Leslie	Email	4/11/2026	N
Joiner, Teressa	Email	4/9/2026	Yes
Joyner, Linda	Email	4/11/2026	Yes
Kalinsky, M. Stosh	Email	4/8/2026	Yes
Kasdan, Rae	Email	4/13/2026	Yes
Kinkade, Lee Ann	Email	4/13/2026	Yes
Kropf, Latifa	Email	4/7/2026	Yes
Krug, Jake	Email	4/7/2026	Yes
Kushner, Deborah	Email	4/8/2026	Yes

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**Draft Permit Public Comment Period
March 12, 2026 - April 13, 2026**

Name or Organization	Method	Date Received	Request for Hearing
Kuylen, Melissa	Email	4/8/2026	Yes
Kuylen, Nico	Email	4/8/2026	Yes
LaBrecque, Emily	Email	4/13/2026	Yes
LaBrecque, Jacob	Email	4/13/2026	Yes
Lacey, Katelyn	Email	4/7/2026	Yes
Laliberte, Colleen	Email	4/13/2026	Yes
Lally, Rebecca	Email	4/7/2026	Yes
Lancaster, Susan	Email	4/2/2026	No
Leake, Joan	Email	4/13/2026	Yes
Lee, Moose	Email	4/10/2026	No
Lee, Erin	Email	4/11/2026	Yes
Lefferts, Lisa	Email	4/13/2026	Yes
Lindeman, Justin	Email	4/13/2026	Yes
Litchte, Lucius	Email	4/8/2026	Yes
Loflin, Laurie	Email	4/13/2026	Yes
Long, Tom	Email	4/12/2026	Yes
Love, Mike	Email	4/11/2026	Yes
Lowery, Melanie	Email	4/12/2026	Yes
Lowry, Kaleb	Email	4/1/2026	Yes
Luck, Michala	Email	4/13/2026	Yes
Mandujano, Marla	Email	4/11/2026	Yes
Mandy, Lindy	Email	4/13/2026	Yes
Mapel, Daniel	Email	4/7/2026	Yes
Martin, William	Email	4/9/2026	Yes
May, Walker	Email	4/12/2026	Yes
McAllister, Rachel	Email	4/11/2026	Yes
McClain, Heather	Email	4/11/2026	Yes
McCoy, Kevin	Email	4/13/2026	Yes
McElroy, Sharon	Email	4/8/2026	Yes
McIntyre, Nancy	Email	4/11/2026	Yes
Meldon, Perri	Email	4/10/2026	Yes
Melton, Kathy	Email	4/12/2026	Yes
Mendonca, Sarah	Email	4/13/2026	Yes
Meyer, Linda, Ph.D.	Email	4/13/2026	Yes
Miller, Heather	Email	4/13/2026	No
Milligan, Jenny	Email	4/11/2026	Yes
Mitchell, Chastity	Email	4/9/2026	Yes
Morris, Margaret	Email	4/13/2026	No
Mosedale, Judith	Email	4/13/2026	Yes
Murphy, Pam	Email	4/13/2026	No
Nairn, Esther	Email	4/6/2026	Yes

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Table 1: Comments Received During the Draft Permit Public Comment Period

**Draft Permit Public Comment Period
March 12, 2026 - April 13, 2026**

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Needham, Douglas	Email	4/13/2026	Yes
Oden, Maia	Email	3/25/2026	No
O'Donnell, Laura	Email	4/10/2026	No
Otis, Rob	Email	4/12/2026	Yes
Owen, Cathy	Email	4/11/2026	Yes
Parker, Virginia	Email	4/11/2026	Yes
Pellegrino, Zander (Chesapeake Climate Action League)	Email	4/7/2026	Yes
Penalver, Liliana	Email	4/12/2026	Yes
Perkins, Amanda	Email	4/10/2026	Yes
Perkins, Patrick	Email	4/10/2026	Yes
Petersson, Lydia	Email	4/13/2026	Yes
Petersson, Lysandra	Email	4/10/2026	Yes
Pharr, Cecil	Email	4/11/2026	Yes
Pickering, Karen	Email	4/11/2026	Yes
Pitt, Monica	Email	4/8/2026	No
Plautz, Claire	Email	4/11/2026	Yes
Popelish, John	Email	4/12/2026	Yes
Przyuski, Tess	Email	4/11/2026	Yes
Putnam, Clayton	Email	4/11/2026	Yes
Putnam, Cynthia	Email	4/11/2026	Yes
Rabon, Betsy	Email	4/13/2026	Yes
Rash, David	Email	4/1/2026	Yes
Reinholt, Dennis	Email	4/13/2026	Yes
Robb, Jen	Email	4/12/2026	Yes
Rosander, Rachel	Email	4/11/2026	Yes
Ross, Merissa	Email	4/11/2026	Yes
Staton, Roxana	Email	4/13/2026	Yes
Saleh, Mona	Email	4/8/2026	No
Sandy, Gina	Email	4/13/2026	Yes
Saxon, Jim	Email	3/26/2026	No
Schermer, Molly	Postal Mail	4/13/2026	Yes
Schultz, Fred	Email	4/11/2026	Yes
Schultz, Allison	Email	4/11/2026	Yes
Schultz, Michael	Postal Mail	4/13/2026	Yes
Scott, Dawn	Email	3/27/2026	No
Sefer, Adnan	Email	4/12/2026	Yes
Shaunesey, Donna	Email	4/7/2026	Yes
Sherman, Wray	Email	4/13/2026	No
Sherman, Marty	Email	4/12/2026	No
Sherrill, Paula	Email	4/12/2026	Yes

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Table 1: Comments Received During the Draft Permit Public Comment Period

**Draft Permit Public Comment Period
March 12, 2026 - April 13, 2026**

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Short, Ashley	Email	4/13/2026	Yes
Shott, Kelly	Email	4/13/2026	Yes
Siron, Christopher	Email	4/12/2026	Yes
Skinner, Erin	Email	4/12/2026	Yes
Slaughter, Katherine	Email	4/9/2026	No
Smith, Dave (The Bowman House Bed and Breakfast)	Email	4/7/2026	Yes
Smith, Jan (The Bowman House Bed and Breakfast)	Email	4/7/2026	Yes
Snyder, Linda	Email	4/13/2026	No
Snyder, John, Dr.	Email	4/13/2026	No
Snyder, Amanda Guedes, Dr.	Email	4/13/2026	No
Snyder, Pamela	Email	4/11/2026	Yes
Solomon, Betsy	Email	4/13/2026	Yes
Southern, Trisha	Email	4/11/2026	Yes
Sprouse, Misty	Email	4/12/2026	Yes
Sprouse, Allison	Email	4/11/2026	Yes
Staton, Roxana	Email	4/13/2026	Yes
Stephens, Melissa	Postal Mail	4/13/2026	Yes
Stewart, Megan	Email	4/11/2026	Yes
Stoltzfus, Ruth	Email	4/13/2026	Yes
Strader, Dianne	Email	4/9/2026	Yes
Swisher, Michelle	Email	4/11/2026	Yes
Tabor, Linda	Email	4/11/2026	Yes
Tan, Claire	Email	4/11/2026	Yes
Taylor, Lysanne	Email	4/13/2026	Yes
Techman, Melissa	Email	4/13/2026	No
Tembhurne, Bhalchandra	Email	4/10/2026	Yes
Tembhurne, Amanda	Email	4/10/2026	Yes
Thisdell, Nicole	Email	4/11/2026	Yes
Tilburg, Jenny	Email	4/8/2026	Yes
Tyler, Stephanie	Email	4/12/2026	Yes
Underwood, Heather	Email	4/13/2026	Yes
Van Acker, Peter	Email	4/11/2026	Yes
Van Slyck, Kate	Email	4/11/2026	No
Walton-Hawthorne, Amanda	Email	4/12/2026	Yes
Waymouth, Ting	Email	4/12/2026	Yes
Wells, Carl	Email	4/8/2026	Yes
Wilkin, Allison	Email	4/11/2026	Yes
Williams, Kyle	Email	4/11/2026	Yes
Wilson, Sharon	Email	4/13/2026	Yes
Winter, Ellen	Email	4/9/2026	Yes

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**Draft Permit Public Comment Period
March 12, 2026 - April 13, 2026**

Name or Organization	Method	Date Received	Request for Hearing
Winter, Philip	Email	4/9/2026	Yes
Womack, Amanda	Email	4/11/2026	Yes
Wood, Clarissa	Email	4/13/2026	Yes
Wood, Alexander	Email	4/13/2026	Yes
Young, Catherine	Email	4/13/2026	Yes
Zeigler, Hannah	Email	4/11/2026	Yes

Table 2: Comments Received During the Draft Permit Public Hearing Period

**Draft Permit Public Hearing Comment Period
June 18, 2026 - July 23, 2026**

Name or Organization	Method	Date Received	Public Hearing	Comment
			Period	Public Hearing
Acton, Patricia A.	Email	6/22/2026	☒	☐
Adler, Kristina	Email	7/6/2026	☒	☐
Alger, Kristi	Email	7/23/2026	☒	☐
Amare, Ayael	Email	7/23/2026	☒	☐
Andrews, DeAnna	Email	7/21/2026	☒	☐
Armstrong, Debbie (JD, MD)	Email	6/19/2026	☒	☐
Austin, Rachel	Email	7/23/2026	☒	☐
Baker, Dorothy	Email	7/20/2026	☒	☐
Balojian, Lauren	Email	7/23/2026	☒	☐
Barnum, Elizabeth	Email	7/19/2026	☒	☐
Barrett, Sharon	Email	7/23/2026	☒	☐
Bow, Neicie	Email	7/21/2026	☒	☐
Bradford, Carol	Email	7/23/2026	☒	☐
Buckenmeyer, Evelyn	Email	7/23/2026	☒	☐
Burns, James	Postal Mail	7/23/2026	☒	☐
Caister, Peggy (or Margaret)	Email	7/23/2026	☒	☐
Christensen, Melanie	Email	7/23/2026	☒	☐
Cocke, Andrew	Email	7/23/2026	☒	☐
Coles, Ryann	Email	7/20/2026	☒	☐
Coles, Stuart	Email	7/20/2026	☒	☐
Cottone, Mary	Email	7/23/2026	☒	☐
Coyner, Mary	Email	7/20/2026	☒	☐
Craig, Matthew	Email	7/23/2026	☒	☐
Craig, Rhonda	Email	7/19/2026	☒	☐
Craig, Wiley	Email	7/19/2026	☒	☐
Crothers, Dale	Email	7/21/2026	☒	☐
Crothers, W	Email	7/20/2026	☒	☐
Cunningham, Cathy	Email	7/23/2026	☒	☐
Dunkle, Elizabeth	Email	7/23/2026	☒	☐
Dupree, Taylor	Email	7/23/2026	☒	☐
Easter, Elizabeth	Email	7/23/2026	☒	☐
Etienne, Theresa	Email	7/23/2026	☒	☐
Falke, Lisa	Email	7/22/2026	☒	☐
Ferguson, Erin	Email	7/21/2026	☒	☐
Ferguson, Rosemary	Email	7/23/2026	☒	☐
Ferrier, Lavinia	Email	7/23/2026	☒	☐
Ferrier, Roderick Iaan	Email	7/23/2026	☒	☐
Fox, Nancy	Written	7/23/2026	☐	☒
Frantz, Shauna	Email	7/22/2026	☒	☐
Frost, Holly	Email	6/18/2026	☒	☐
Fust, Jordan	Email	7/23/2026	☒	☐
Gederberg, Thomas	Email	7/23/2026	☒	☐
George, Lisa	Email	6/24/2026	☒	☐
Gladwell, Angela	Email	7/20/2026	☒	☐
Glass, Jonathan	Email	7/22/2026	☒	☐
Greenberg, Lori	Written	7/23/2026	☒	☒
Greenleaf, Betsy	Email	7/22/2026	☒	☐
Gregory, Ann	Email	7/23/2026	☒	☐
Grimm, Mary	Email	7/23/2026	☒	☐
Gurkin, Hailey	Email	7/23/2026	☒	☐
Hall, Hunter	Email	7/22/2026	☒	☐
Hamilton, AJ	Email	7/20/2026	☒	☐

Table 2: Comments Received During the Draft Permit Public Hearing Period

**Draft Permit Public Hearing Comment Period
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Name or Organization	Method	Date Received	Public Hearing	
			Comment Period	Public Hearing
Hamilton, Alan	Email	7/21/2026	☒	☐
Hanigosky, Taylor	Email	7/23/2026	☒	☐
Hankins, John	Email	7/23/2026	☒	☐
Harman, Emily	Email	7/9/2026	☒	☐
Hathaway, Olivia	Email	7/7/2026	☒	☐
Hawthorn, Matthew	Written	7/23/2026	☒	☒
Herek, Kasha Mustin	Email	7/23/2026	☒	☐
Heron, Elizabeth	Email	7/21/2026	☒	☐
Hewitt, Sam	Email	6/23/2026	☒	☐
Hickman, Willa	Email	7/20/2026	☒	☐
Higgins, Victoria (Chesapeake Climate Action League)	Email	7/20/2026	☒	☐
Holcombe, Katherine	Email	7/23/2026	☒	☐
Howe, Bill	Email	7/21/2026	☒	☐
Hughes, Bonnie	Email	7/23/2026	☒	☐
Jackman, Diane	Email	6/18/2026	☒	☐
Johnson, Matt	Email	7/23/2026	☒	☐
Kalanta, Nancy	Email	7/23/2026	☒	☐
Kane, Rick	Email	7/21/2026	☒	☐
Kappers, Aimee	Written	7/23/2026	☐	☒
Kasdan, Rae	Written	7/23/2026	☒	☒
Kasdan, Steven	Email	7/23/2026	☒	☐
Kerekes, Paul	Email	7/20/2026	☒	☐
Kessler, Ben	Email	7/23/2026	☒	☐
Kushner, Deborah	Written	7/23/2026	☒	☒
Lancaster, Susan	Email	6/21/2026	☒	☐
Langberg, Danielle	Email	7/23/2026	☒	☐
Langberg, Kurt	Email	7/23/2026	☒	☐
Lanman, Natalie	Email	7/23/2026	☒	☐
Leake, Joan	Email	7/23/2026	☒	☐
Lefferts, Lisa	Email	7/23/2026	☒	☐
Lichte, Lucius	Email	7/23/2026	☒	☐
Lowry, Rebecca	Email	7/23/2026	☒	☐
Mandy, Lindy	Email	7/23/2026	☒	☐
Marroquin-Flores, Rosario	Email	7/23/2026	☒	☐
McCoy, Kevin	Email	6/18/2026	☒	☐
McSweeney, Nancy (Anderson)	Email	7/23/2026	☒	☐
Meldon, Perry	Email	7/23/2026	☒	☐
Melton, Janet	Email	7/21/2026	☒	☐
Merritt, Eileen, Dr.	Email	7/23/2026	☒	☐
Meyer, Linda A, Ph.D.	Written	7/23/2026	☒	☒
Monaco, Lorraine	Email	7/23/2026	☒	☐
Moore, Joe (Alliance for the Shenandoah Valley)	Email	7/21/2026	☒	☐
Moyer, Victoria	Email	7/23/2026	☒	☐
Murray, Lynn	Email	7/23/2026	☒	☐
Natishan, Georgia (Kate, Dr.)	Email	7/23/2026	☒	☐
Needham, Douglas	Email	7/23/2026	☒	☐
Nelson, John	Email	7/22/2026	☒	☐
Nicholson, Heather	Email	7/23/2026	☒	☐

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**Draft Permit Public Hearing Comment Period
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Name or Organization	Method	Date Received	Public Hearing	
			Comment Period	Public Hearing
Noel, Mary (Mary McKernan)	Email	7/20/2026	☒	☐
Norton, Jordan	Email	7/23/2026	☒	☐
Orner, Ariana	Email	7/23/2026	☒	☐
Otteni, Stephanie	Email	7/22/2026	☒	☐
Owen, Cathleen	Email	7/8/2026	☒	☐
Paterson, Haley	Email	7/23/2026	☒	☐
Patterson, Roberta	Email	7/13/2026	☒	☐
Pellegrino, Zander (Chesapeake Climate Action League)	Email	7/23/2026	☒	☐
Pence, Elizabeth	Email	7/17/2026	☒	☐
Petersson, Lydia	Email	7/23/2026	☒	☐
Pickering, Karen	Email	7/23/2026	☒	☐
Putnam, Cindy	Email	7/23/2026	☒	☐
Putnam, Clayton	Email	7/23/2026	☒	☐
Quillen, Max (South River Watershed Alliance)	Email	6/24/2026	☒	☐
Rayman, Beverly	Postal Mail	7/23/2026	☒	☐
Robertson, Julia	Email	7/23/2026	☒	☐
Robinette, Barbara	Email	7/23/2026	☒	☐
Rogers, Jon	Email	7/9/2026	☒	☐
Rollings, Janet	Written	7/23/2026	☒	☒
Rule, Rob	Email	7/23/2026	☒	☐
Salinas, Alicia	Email	7/23/2026	☒	☐
Schoolcraft, Valerie	Email	7/23/2026	☒	☐
Shallash, Linda	Email	7/23/2026	☒	☐
Sheridan, Caroline (Shenandoah Green)	Email	7/23/2026	☒	☐
Sherman, Martha	Email	6/27/2026	☒	☐
Shifflett, Hannah	Email	7/23/2026	☒	☐
Simmons, Janice	Email	7/19/2026	☒	☐
Sings, Annabeth	Email	7/20/2026	☒	☐
Solomon, Betsy	Email	7/20/2026	☒	☐
Sowell, Rebecca	Email	7/23/2026	☒	☐
Stapel, Ærn	Email	7/23/2026	☒	☐
Summers-Minette, Daniel C., Dr.	Email	7/23/2026	☒	☐
Swartz, Christopher	Email	7/23/2026	☒	☐
Tan, Claire	Email	7/21/2026	☒	☐
Taylor, Lysanne	Email	7/21/2026	☒	☐
Taylor, Robert	Written	7/23/2026	☒	☒
Tyler, Joseph	Email	7/23/2026	☒	☐
Tyler, Stephanie	Email	7/23/2026	☒	☐
Valenzuela, Cody	Email	7/23/2026	☒	☐
Vest, Cabell	Email	7/22/2026	☒	☐
Warren, Ryan	Email	7/20/2026	☒	☐
Wiecek, Schyler	Email	7/23/2026	☒	☐
Yergin, Tess	Email	7/23/2026	☒	☐

Table 2: Comments Received During the Draft Permit Public Hearing Period

**Draft Permit Public Hearing Comment Period
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Name or Organization	Method	Date Received	Public Hearing Comment Period	Public Hearing
Verbal - Hearing				
Beedle, Mary	Verbal	7/23/2026	☐	☒
Briggs, Nicole	Verbal	7/23/2026	☐	☒
Butler, Diane	Verbal	7/23/2026	☐	☒
Caister, Libby	Verbal	7/23/2026	☐	☒
Centeno, Brittany	Verbal	7/23/2026	☐	☒
Clark, Rob	Verbal	7/23/2026	☐	☒
Craig, Matthew	Verbal	7/23/2026	☐	☒
Crothers, Dale	Verbal	7/23/2026	☐	☒
Curcio, Milio	Verbal	7/23/2026	☐	☒
Eheart, Carrie	Verbal	7/23/2026	☐	☒
Engle, Tom	Verbal	7/23/2026	☐	☒
Ferrier, Roderick	Verbal	7/23/2026	☐	☒
Fersner, Savannah	Verbal	7/23/2026	☐	☒
Fersner, Susan L.	Verbal	7/23/2026	☐	☒
Fox, Nancy	Verbal	7/23/2026	☐	☒
Gederberg, Tom	Verbal	7/23/2026	☐	☒
George, Lisa	Verbal	7/23/2026	☐	☒
Greenberg, Lori	Verbal	7/23/2026	☐	☒
Gurkin, Hailey	Verbal	7/23/2026	☐	☒
Hanigosky, Taylor	Verbal	7/23/2026	☐	☒
Hogan, Elizabeth	Verbal	7/23/2026	☐	☒
Holmes, Mark	Verbal	7/23/2026	☐	☒
Jacenich, Lisa	Verbal	7/23/2026	☐	☒
Jackson, Andrea	Verbal	7/23/2026	☐	☒
Jobs, Donna	Verbal	7/23/2026	☐	☒
Kasdan, Rae	Verbal	7/23/2026	☐	☒
Kushner, Deborah	Verbal	7/23/2026	☐	☒
Langberg, Kurt	Verbal	7/23/2026	☐	☒
Lefferts, Lisa	Verbal	7/23/2026	☐	☒
Luck, Michala	Verbal	7/23/2026	☐	☒
McAllister, Tiffany	Verbal	7/23/2026	☐	☒
Merritt, Eileen	Verbal	7/23/2026	☐	☒
Murray, Ann	Verbal	7/23/2026	☐	☒
Needham, Douglas	Verbal	7/23/2026	☐	☒
Patler, Nicholas	Verbal	7/23/2026	☐	☒
Powell, Kim O	Verbal	7/23/2026	☐	☒
Robertson, Julia	Verbal	7/23/2026	☐	☒
Rollings, Janet	Verbal	7/23/2026	☐	☒
Rosenberger, Ann	Verbal	7/23/2026	☐	☒
Simmons, Janice	Verbal	7/23/2026	☐	☒
Siron, Chris	Verbal	7/23/2026	☐	☒
Suavez, David	Verbal	7/23/2026	☐	☒
Summers-Minetto, Daniel C.	Verbal	7/23/2026	☐	☒
Tan, Claire	Verbal	7/23/2026	☐	☒
Taylor, Robert	Verbal	7/23/2026	☐	☒
Turner, Heron	Verbal	7/23/2026	☐	☒
Tyler, Joseph	Verbal	7/23/2026	☐	☒
Valenzuela, Cody	Verbal	7/23/2026	☐	☒
Warren, Ryan	Verbal	7/23/2026	☐	☒
Welsh, Keeley	Verbal	7/23/2026	☐	☒
Wiecek, F. Scott	Verbal	7/23/2026	☐	☒

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Draft Permit Public Hearing Comment Period
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Name or Organization	Method	Date Received	Public Hearing	
			Comment Period	Public Hearing
Wiecek, Remington	Verbal	7/23/2026	☐	☒
Wiecek, Schyler	Verbal	7/23/2026	☐	☒
Williams, Kim	Verbal	7/23/2026	☐	☒
Wingfield, David	Verbal	7/23/2026	☐	☒