STATEMENT OF BASIS

Title V Air Operation Permit Revision
Draft/Proposed Permit No. 010310213-023-AV
Renewal of Title V Operation Permit No. 0310213-020-AV

APPLICANT

The applicant for this project was the Department of the Navy, Naval Station, Mayport. The applicant's responsible official and mailing address are: Captain D.F. Cochrane, Naval Station, Mayport, P. O. Box 280112, Mayport, Florida 32228-0112

FACILITY DESCRIPTION

The Department of the Navy operates Naval Station, Mayport as the homeport for aircraft carriers and various support ships. Air pollution sources located at the base include both gas fired as well as fuel oil fired boilers and water heaters, emergency generators, miscellaneous fuel storage tanks, cold solvent degreasers, engine test stands, abrasive blasting operations, various surface coating operations (paint booths, open air painting, and ship painting) associated with infrastructure as well as with aircraft and ship maintenance.

The primary mission of the Naval Station, Mayport is to "sustain and enhance war fighter efforts" by providing the training of various Navy personnel. Of the several entities at the naval station, Naval Station, Mayport and the Naval Engineering Command Southeast (NAVFAC SE) are responsible for most of the permanent operations. NAVFAC SE is responsible for the operation and maintenance of their various boilers, emergency generators and associated fuel tanks; Naval Station, Mayport is responsible for the other equipment operations, including the activities of the Southeast Regional Maintenance Center (SERMC) and the various on-site contractors.

PROJECT DESCRIPTION

The purpose of this permit is to renew Title V Air Operation Permit No. 0310213-020-AV. Additionally, two (2) new emissions units were created for thirty-two (32) emergency stationary compression ignition reciprocating internal combustion engines (RICE). The emergency stationary compression ignition RICE are subject to 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary RICE, 40 CFR 63, Subpart A, 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, and 40 CFR 60, Subpart A, General Provisions. The emergency generators greater than 500 kW under Emission Unit No. 018, currently listed under Appendix U-1, List of Unregulated Emission Units and/or Activities, will now be under one of the newly formed emission units. Two new emission units were created for four Gasoline Dispensing Facilities. These gasoline dispensing facilities are subject to 40 CFR 63, Subpart CCCCCC, National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities and 40 CFR 63, Subpart A. The Fuel Storage Tanks at a Gasoline Dispensing Facility greater than 500 Gallons capacity each under Emission Unit No. 019, currently listed under Appendix U-1, List of Unregulated Emission Units and/or Activities, will now be under one of the newly formed emission units. Emission Unit Nos. 001, 002 003 and 035 are not subject to 40 CFR 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources because they are gas-fired boilers in accordance with 63.11195(e) and 63.11237.

Also, the following changes were made to Title V Air Operation Permit No. 0310213-022-AV, a revision of Permit No. 0310213-020-AV:

1. "The use of fuel shall be limited to periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year" has been added to Emission Unit Nos. 001, 002, 003, Specific Condition No. 3 and Emission Unit No. 035, Specific Condition No. 4 for clarification.

2. Specific Conditions Nos. 2 and 3 under Emission Unit Nos. 001, 002 and 003 in Permit No. 0310213-022-AV have been combined to form single Specific Condition No. 2 in this renewal. Specific Conditions Nos. 3 and 4 under Emission Unit No. 035 have been combined to form single Specific Condition No. 3 in this renewal. Other specific conditions have been renumbered accordingly.

3. Specific Condition No. 2 under Emission Unit No. 022 has been added to indicate the maximum, usage of paints, solvents and adhesives. Other specific conditions have been renumbered accordingly.

4. Specific Condition No. 3 under Emission Unit No. 022 in Permit No. 0310213-022-AV has been expanded to indicate the appropriate records that must be kept. This is Specific Condition No. 4 in this renewal.

5. Specific Condition No. 6. under Emission Unit No. 022, Test Methods and Procedures have been added.

6. The make and model number of the particulate matter control devices under Emission Unit Nos. 030, 031 and 034 have been added.

7. The emission unit description and Specific Condition No. 7, Test Methods and Procedures, Emission Unit No. 030 have been corrected per Wayne Walker's email dated January 10, 2013.

8. "Applicant's Request" for the hours of operation under Emission Unit No. 033, Emission Limitations and Standards, Specific Condition No. 3 and Emission Unit No. 034, Essential Potential to Emit (PTE) Parameters, Specific Condition No. 2 has been replaced with the permit in which they were requested.

9. The required RACT Statement has been added to Emission Unit No. 033, Emission Limitations and Standards. Other specific conditions have been renumbered accordingly.

10. The specific condition for the Operation and Maintenance Plan under Recordkeeping and Reporting for Emission Unit Nos. 015, 030, 031, 033 and 036 has been reworded.

11. Specific Condition No. 10, Test Methods and Procedures have been added. Other specific conditions have been renumbered accordingly.

12. Specific Condition No. 14 under Emission Unit No. 035, Recordkeeping and Reporting Requirements has been added. Other specific conditions have been renumbered accordingly.

13. New Emission Unit Nos. 037 and 038 were created for emergency diesel engines.

14. New Emission Unit Nos. 039 and 040 were created for gasoline dispensing facilities.

PRIMARY REGULATORY REQUIREMENTS

Naval Station, Mayport is classified as a Title V source because potential emissions of one or more individual criteria pollutants is equal to or greater than 100 tons per year in accordance with Chapter 62-210, FAC, and Rule 2.301 JEPB. Based on the Title V Operation Permit Revision Application received May 17, 2013, this facility is a synthetic Non-Title V source of hazardous air pollutants (HAPs) because the potential emissions of any single HAP is limited to less than 10 tons per year and the potential emissions of total HAPs is limited to less than 25 tons per year in accordance with Chapter 62-210, FAC, and Rule 2.301 JEPB.

Based on the Title V Operation Permit Revision Application received May 17, 2013, this facility is a synthetic minor source of hazardous air pollutants (HAPs).

MACT: Emission Unit No. 037 and 038 are subject to 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Emission Unit No. 037 and 038 are subject to 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and 40 CFR 63, Subpart A, General Provisions

Emission Unit Nos. 039 and 040 are subject to 40 CFR 63, Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities.

Emission Unit Nos. 001, 002, 003 and 035 are not subject to 40 CFR 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources because they are gas-fired boilers in accordance with 63.11195(e) and 63.11237.}

NSPS: Emission Unit No. 038 is subject to 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 60, Subpart A, General Provisions.

Emission Unit No. 035 is subject to 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units and 40 CFR 60, Subpart A, General Provisions, shall apply to the boiler.

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

RACT: Emission Unit Nos. 015, 030, 031, 033 and 036 are subject to Reasonable Available Control Technologies (RACT).

PROJECT REVIEW

The purpose of this permit is to renew Title V Air Operation Permit No. 0310213-020-AV. Two new emission units were created for thirty-two emergency stationary compression ignition reciprocating internal combustion engines (RICE). Two new emission units were created for four Gasoline Dispensing Facilities. Emission Unit Nos. 001, 002 003 and 035 are not subject to 40 CFR 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources because they are gas-fired boilers in accordance with 63.11195(e) and 63.11237. In addition, language in specific conditions has been updated, specific conditions have been combined, added and renumbered accordingly. Also, make and model numbers of control devices have been specified for their respective emission units.

CONCLUSION

This project renews Title V Air Operation Permit No. 0310213-020-AV, which was issued on January 27, 2009. This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, Florida Administrative Code (F.A.C.). In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawing(s), plans, and other documents on file with the Permitting Authority.