STATEMENT OF BASIS

Title V Air Operation Permit Revision
Permit No. 0310215-052-AV

APPLICANT

The applicant for this project is Department of the Navy, Naval Air Station, Jacksonville. The applicant's responsible official and mailing address are: Roy C. Undersander, Captain- Department of the Navy, Naval Air Station, Jacksonville, P.O. Box 50, Jacksonville, FL 32212.

FACILITY DESCRIPTION

The applicant operates the Naval Air Station, Jacksonville, which is located at 6801 Roosevelt Blvd., Jacksonville, Florida.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permit is to revise the Title V air operation permit for the above referenced facility to incorporate Construction Permit Nos. 0310215-044-AV, 0310215-045-AV, and 0310215-050-AC.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received 12/18/2014.
Notice of Intent to Issue Air Permit issued **01/09/2015**
Public Notice Published **01/15/2015**

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility **is** identified as a major source of hazardous air pollutants (HAP).

Title V: The facility **is** a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

PROJECT REVIEW

Permit 0310215-044-AC revised EUs 062, 063, 065, 066, and 103. EUs 065 and 066 have not completed construction as of this permitting project, and are therefore not being amended in this Title V revision. Permit 0310215-044-AC was amended by permit 0310215-050-AC to revise conditions concerning EU 103. Permit 0310215-045-AC inactivated EU 080 and added the new EU 117, which is partially made up of portions of the old EU 080.

Below is a brief description of any changes that were made as part of this revision. Numerically list a discussion of the reasons for the changes being made as part of this project, followed by the conditions(s) being changed.

SECTION II. FACILITY-WIDE CONDITIONS

1. Facility-Wide Conditions FW6 and FW7 -- updated to reflect changes in the rules concerning Title V annual fees

SECTION III., Subsection F. Emissions Unit 103

2. Updated Emission Control Device description to reflect replacement of control device authorized by Construction Permit No. 0310215-044-AC

3. Added note indicating that this emissions unit is now subject to RACT requirements as a result of the increase in allowable PM emissions authorized by Construction Permit No. 0310215-050-AC

4. Specific Condition F.1. -- Reduced allowable operating hours from 8,760 hrs/yr to 4,160 hrs/yr as authorized by Construction Permit No. 0310215-050-AC

5. Specific Condition F.3. – Added to specify parameters as required by RACT requirements

6. Specific Condition F.6. – Increased allowable PM emissions as authorized by Construction Permit 0310215-050-AC

7. Specific Condition F.7. – Added to include RACT requirements

8. Specific Conditions F.8. and F.9. – Included HEPA filter to reflect replacement of control device authorized by Construction Permit No. 0310215-044-AC

9. Specific Condition F.12. – Changed VE testing frequency to match language from Rule 62-297.310(7)(a)4., F.A.C.

10. Specific Condition F.20. – Added records retention requirement from Rule 62-213.440(1)(b)2.b., F.A.C.

11. Updated conditions numbering, formats, and corrected various rule references

SECTION III., Subsection Q. Emissions Unit 062

12. Updated PM Control Device description to reflect replacement of control device authorized by Construction Permit No. 0310215-045-AC

13. Added note indicating that this emissions unit is now subject to the Operation and Maintenance Plan RACT requirements as a result of the Operation and Maintenance Plan required by Construction Permit No. 0310215-045-AC

14. Specific Condition Q.2. – Added to specify change in maximum airflow rate as authorized by Construction Permit No. 0310215-045-AC

15. Specific Condition Q.4. – Changed allowable PM emissions as authorized by Construction Permit No. 0310215-045-AC

16. Specific Condition Q.8. -- Changed VE testing frequency to match language from Rule 62-297.310(7)(a)4., F.A.C.

17. Specific Condition Q.12. – Added records retention requirement from Rule 62-213.440(1)(b)2.b., F.A.C.

18. Updated conditions numbering, formats, and corrected various rule references

SECTION III., Subsection R. Emissions Unit 063

19. Updated PM Control Device description to reflect replacement of control device authorized by Construction Permit No. 0310215-045-AC

20. Added note indicating that this emissions unit is now subject to the Operation and Maintenance Plan RACT requirements as a result of the Operation and Maintenance Plan required by Construction Permit No. 0310215-045-AC

21. Specific Condition R.2. – Added to specify change in maximum airflow rate as authorized by Construction Permit No. 0310215-045-AC

22. Specific Condition R.4. – Changed allowable PM emissions as authorized by Construction Permit No. 0310215-045-AC

23. Specific Condition R.8. -- Changed VE testing frequency to match language from Rule 62-297.310(7)(a)4., F.A.C.

24. Specific Condition R.12. – Added records retention requirement from Rule 62-213.440(1)(b)2.b., F.A.C.

25. Updated conditions numbering, formats, and corrected various rule references

SECTION III., Subsection T. Emissions Unit 117

26. Renamed EU 080 to EU 117, as authorized by Construction Permit No. 0310215-044-AC

27. Updated PM Control Device description to include new paint booths authorized by Construction Permit No. 0310215-044-AC

28. Removed permitting note referring to old EU ID No.

The following changes were also made to the final permit in response to comments received from the facility on the draft/proposed permit:

1. Specific Conditions A.10, B.7, C.7, D.7, E.7, G.12, H.11, I.11, J.10 and S.7 were updated with the current VE testing frequency language to maintain consistency with the changes in Specific Conditions F.12, Q.8 and R.8.

2. Specific Conditions G.14, H.13, I.13 and J.12 were updated with the RACT rule language to allow VE tests demonstrating no visible emission (5 percent or lower) to be submitted in lieu of a particulate stack test to maintain consistency with the changes in Specific Conditions F.14, Q.10 and R.10.

3. EU127 and boiler EC060 from EU126 have been permanently shut down and so were removed from the permit.

CONCLUSION

This project revises the Title V Air Operation Permit No. 0310215-052-AV for the above referenced facility and to incorporate Construction Permit Nos. 0310215-044-AV, 0310215-045-AV and 0310215-050-AC.

Title V Air Operation Permit No. 0310215-047-AV was issued on March 7, 2014. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.