BAE Systems Southeast Shipyards
Ship Building and Repair Facility
Facility ID No.: 0310258
Duval County

Title V Air Operation Permit Renewal
FINAL Title V Air Operation Permit No.: 0310258-011-AV

PERMITTING & COMPLIANCE AUTHORITY:
NEIGHBORHOODS DEPARTMENT
ENVIRONMENTAL QUALITY DIVISION
214 NORTH HOGAN STREET, 7TH FLOOR
JACKSONVILLE, FL 32202
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Title V Air Operation Permit Renewal

FINAL Title V Air Operation Permit No.: 0310258-011-AV
Renewal of Title V Air Operation Permit No.: 0310258-009-AV

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Emission Unit ID No.	Brief Description
017	Open Air Grit Blasting
018	Open Air Surface Coating
019	Abrasive Blast Booths
020	Indoor Surface Coating
021	Portable Grit Silos
022	Administrative Building Emergency Diesel Engine
023	Domestic Wastewater Treatment Plant Emergency Diesel Engine

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Permittee:
BAE Systems Southeast Shipyards
8500 Heckscher Drive
Jacksonville, FL 32226

FINAL Permit No.: 0310258-011-AV
Facility ID No.: 0310258
SIC Nos.: 37
Project: Title V Air Operation Permit Renewal

This permit is for the purpose of renewing Title V Air Operation Permit No. 0310258-009-AV. BAE Systems Southeast Shipyards is located at 8500 Heckscher Drive, Jacksonville, Duval County, FL 32226; UTM Coordinates: Zone 17, 455.7 km East and 3361.9 km North; Latitude: 30° 23' 24" North and Longitude: 81° 27' 39" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (FS), and Chapters 62-4, 62-210 and 62-213, Florida Administrative Code (FAC). The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Permitting Authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Statement of Basis
Appendix B-1, 40 CFR 63 Subpart II: Tables 1., 2., & 3., and Appendix A
Appendix CP, Compliance Procedures
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix SS-1, Stack Sampling Facilities
Appendix TV-6, Title V Conditions version dated 06/23/06
Appendix U-1, List of Unregulated Emissions Units and/or Activities

Effective Date:	**August 16, 2012**
Renewal Application Due Date:	**January 3, 2017**
Expiration Date:	**August 16, 2017**

Neighborhoods Department
Environmental Quality Division

_____
Vincent A. Seibold, P.E.
Division Chief

VAS/HDS

Section I. Facility Information.

Subsection A. Facility Description.

BAE System Southeast Shipyards is a full service ship building and repair operation. The facility operations includes abrasive blasting, open air and indoor surface coating of ships and part, steel work, machinery, electrical and piping work. In addition, there are two (2) portable grit silos.

This permit is for the purpose of renewing Title V Air Operation Permit No. 0310258-009-AV.

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

BAE Systems Southeast Shipyards is a Title V major source of pollution because the 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, Jacksonville Environmental Protection Board (JEPB).

Based on the Title V Operation Permit Renewal application received January 19, 2012, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

Emission Unit ID No.	Brief Description
017	Open Air Grit Blasting
018	Open Air Surface Coating
019	Abrasive Blast Booths
020	Indoor Surface Coating
021	Portable Grit Silos
022	Administrative Building Emergency Diesel Engine
023	Domestic Wastewater Treatment Plant Emergency Diesel Engine

Note: Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Appendix LR-1, Local Rule Index
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements

These documents are on file with Permitting Authority:

Title V Air Operation Permit Renewal Application received January 19, 2012

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix TV-6, Title V Conditions, is a part of this permit.
   {Permitting note: Appendix TV-6, Title V Conditions, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

2. General Particulate Emission Limiting Standards. General Visible Emissions Standard.
   Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity) in accordance with Rule 62-296.320(4)(b)1., FAC, and Rule 2.1101, JEPB. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, FAC, and Rule 2.1201, JEPB. Testing shall be required upon request of the Permitting Authority.

3. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Permitting Authority.
   [Rule 62-296.320(1), FAC, and Rule 2.1101, JEPB]

4. Excess emissions resulting from startup, shutdown, or malfunction of any emission unit (EU) shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Permitting Authority for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Permitting Authority in accordance with Rule 62-4.130, FAC and Rule 2.1401, JEPB. A full written report on the malfunctions shall be submitted to the Permitting Authority in a quarterly report, if requested by the Permitting Authority.
   [Rule 62-210.700, FAC, and Rule 2.301, JEPB]

5. Permittee shall notify the Permitting Authority fifteen (15) days prior EU testing.
   [Rule 62-297.310(7)(a)9., FAC, and Rule 2.1201, JEPB]

6. Testing of emissions shall be conducted with the EU operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then emission units may be tested at less than the maximum permitted capacity; in this case subsequent EU operation is limited to 110 percent of the test load until a new test is conducted. Once the EU is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the authority to operate at the permitted capacity in the permit.
   [Rule 62-297.310(2), FAC, and Rule 2.1201, JEPB]

7. Copies of the test report(s) shall be filed with the Permitting Authority within forty-five (45) days of completion of testing.

[Rule 62-297.310(8)(b), FAC, and Rule 2.1201, JEPB]

8. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter emissions from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following:

   a. Paving and maintenance of roads, parking areas and yards.
   b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
   c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
   d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
   e. Landscaping or planting of vegetation.
   f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
   g. Confining abrasive blasting where possible.
   h. Enclosure or covering of conveyor systems.

   [Rule 62-296.320(4)(c)1., 2., & 3., FAC and Rule 2.1101, JEPB]

9. Control equipment shall be provided with a method of access that is safe and readily accessible.
   [Rule 62-297.310(6), FAC, and Rule 2.1201, JEPB]

10. <u>Prevention of Accidental Releases (Section 112(r) of CAA)</u>.

    a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

    RMP Reporting Center
    Post Office Box 10162
    Fairfax, VA 22038
    Telephone: (703) 227-7650

    and,

    b. The permittee shall submit to the Permitting Authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), FAC.

    [40 CFR 68, Rule 204.800, FAC, and Rule 2.1001, JEPB]

11. <u>Annual Operation Report</u>. Permittee shall submit an annual operating report to the Permitting Authority for all emissions units on the forms supplied for each calendar year by April 1 of the following year.
    [Rule 62-210.370(3), F.A.C. and Rule 2.301, JEPB]

12. <u>Permit Renewal</u>. For purposes of a permit renewal, a timely application is one that is submitted 225 days before the expiration of a permit that expires on or after June 1, 2009.
    [Rule 62-213.420(1)(a)2., F.A.C. and Rule 2.501, JEPB]

13. Notification of Startup. The owners or operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the Permitting Authority in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.

    a. The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.
    b. If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Permitting Authority as soon as possible after the date of such startup is ascertained.

    [Rule 62-210.300(5), F.A.C. and Rule 2.301, JEPB]

14. Insignificant Emission Units and/or Activities, Appendix I-1, List of Insignificant Emission Units and/or Activities, is a part of this permit.
    [Rule 62-213.440(1), FAC, Rule 62-213.430(6), FAC, Rule 62-4.040(1)(b), FAC; Rule 2.501, JEPB and Rule 2.1401, JEPB]

15. Unregulated Emission Units and/or Activities Appendix U-1 List of Unregulated Emission Units and/or Activities, is a part of this permit.
    [Rule 62-213.440(1), FAC, and Rule 2.501, JEPB]

16. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-Line Information Center at the following Internet web site: "http://www.dep.state.fl.us/air/emission/tvfee.htm".
    [Rule 62-213.205, FAC and Rule 2.501, JEPB]

17. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
    [Rule 62-213.420(4), FAC and Rule 2.501, JEPB]

18. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., FAC, shall be submitted to the Permitting Authority and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), FAC. {Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., FAC (see Condition 51. of Appendix TV-6, Title V Conditions)}
    [Rules 62-213.440(3) and 62-213.900, FAC, and Rule 2.501, JEPB]

19. When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
    [Rule 62-213.440, FAC and Rule 2.501, JEPB]

20. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, GA 30303-8960
Telephone: (404) 562-9155
Fax: (404) 562-9163

21. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. The permittee shall report in accordance with the requirements of Rule 62-210.700(6), FAC, Rule 62-4.130, FAC, Rule 2.301, JEPB, and Rule 2.1401, JEPB, deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), FAC and Rule 2.501, JEPB. Unless otherwise specified in **a permit, rule, or order;** reports shall cover the period of January through June (report due on or before September 1) and July through December (report due on or before March 1).
[Rule 62-213.440(1)(b)3., FAC and Rule 2.501, JEPB]

22. All activities shall be performed as scheduled and recorded in accordance with all Operation and Maintenance Plans. Data shall be made available to the Permitting Authority upon request. Records shall be maintained on file for a minimum period of five (5) years.
[Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

23. The permittee shall submit all compliance related notifications and reports required of this permit to:

Neighborhoods Department
Environmental Quality Division
214 North Hogan Street, 7th Floor
Jacksonville, FL 32202
Telephone: (904) 255-7100
Fax: (904) 588-0518

The following Facility-wide conditions are not federally enforceable

24. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), FAC, and Rule 2.1101, JEPB]

25. The facility shall be subject to the City of Jacksonville Ordinance Code, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 376 [Odor Control], and JEPB Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice].

26. The facility shall be subject to JEPB Rule 2, Parts I through VII, and Parts IX through XIV.

Section III. Emissions Unit(s) and Conditions.

Emissions Unit No. 017 – Open Air Grit Blasting

Emissions Unit Description: Abrasive blasting of metal areas of the ship which are rusting, corroding, or otherwise in need of repair.

Essential Potential to Emit (PTE) Parameters

1. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year (hrs/yr).
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. The maximum annual abrasive blast media usage shall not exceed 20,500 tons per year (tons/yr).
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

3. Unconfined particulate matter (PM) emissions shall be controlled by using reasonable precautions.
[Rule 62-296.320(4)(c), FAC, and Rule 2.1101, JEPB]

4. VE from grit blasting of internal ship surfaces (including but not limited to tanks and holds) shall be less than 20% opacity. If needed to comply with the 20% opacity limit, PM control device(s) shall be used. The opacity limit from grit blasting of internal ship surfaces shall be applicable to PM emissions venting to the atmosphere. PM collected shall not be discharged into waters of the State without obtaining all required Local, State and Federal permits.
[Rule 62-296.320(4)(b), FAC, and Rule 2.1101, JEPB]

Reasonable Assurances

5. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter emissions from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following:

   a. Alternatives to open air dry grit blasting, such as hydro blasting, wet blasting, and automated totally enclosed recyclable blasting equipment, shall be used whenever practicable.
   b. All grit transport containers shall be maintained to eliminate spillage during on and off loading, and during transportation.
   c. All grit, new and/or used, shall be transported entirely within the confines of the permittee's property, except for that utilized and/or disposed at other locations or that sold to third-party purchasers.
   d. A regular sweeping program shall be maintained for all intrayard transport routes.

   [Rule 62-296.320(4)(c), FAC and Rule 2.1101, JEPB]

Recordkeeping and Reporting Requirements

6. Quarterly abrasive blasting reports shall be submitted to the Permitting Authority no later than the 20th day of the month following the end of each calendar quarter. The reports shall contain the following information:

   a. Type of blast media
   b. Amount used

   [Rule 62-213.440(1)(b), FAC, and Rule 2.501, JEPB]

Emissions Unit No. 018 – Open Air Surface Coating

Emissions Unit Description: Coatings are applied to marine vessels and parts using paints furnished by the vessel owner or prescribed by a standard ship registry. Coatings are applied manually using high velocity, low pressure air guns, airless paint guns and brush or roll depending on solids in the coatings.

Essential Potential to Emit (PTE) Parameters

1. This emissions unit is allowed to operate continuously, i.e., 8,760 hrs/yr.
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. BAE Systems Southeast Shipyards shall comply with the provisions of 40 CFR 63, Subpart II – National Emission Standards for Shipbuilding and Ship Repair (Surface Coating), and 40 CFR 63, Subpart A – General Provisions (as described in Table 1 to Subpart II of Part 63 – General Provisions of Applicability to Subpart II).

3. The application of any surface coatings at a shipbuilding or repair facility shall not exceed VOHAP contents, as applied, pursuant to Table 2 to Subpart II of Part 63 – Volatile Organic HAP (VOHAP) Limits for Marine Coatings.
   [40 CFR 63.783, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

4. Surface coatings applied to miscellaneous metal parts and products other than the exterior of a marine vessel shall not exceed a maximum VOC content of 3.5 pounds per gallon, excluding water pursuant to Rule 62-296.513(2)(a)2., FAC, and Rule 2.1101, JEPB. Surface coatings applied to the exterior of a marine vessel are exempt from any RACT VOC content limitation.
   [Rule 62-296.513(1)(b)10., FAC, and Rule 2.1101, JEPB]

5. The maximum allowable VOC emissions from this emissions unit shall not exceed 211.06 tons/yr. (Applicant's request).
   [Permit No. 031258-009-AV, Rule 62-212.400, FAC, and Rule 2.401, JEPB]

Test Methods and Procedures

6. For each batch of coating received by the permittee, demonstration of compliance shall be determined by using the procedures in 63.785(a) or (b). The permittee may test each batch of coating, may use a certification supplied by the manufacturer for the batch, or may use any combination of three compliance procedure options described in 63.785(c)(1) through (c)(4). See Appendix CP for a flow diagram of the compliance procedure options.
   [40 CFR 63.785, Rule 62.204.800, FAC, and Rule 2.201 JEPB]

7. Batch formulation data may be used as a test method in lieu of Method 24 of Appendix A to 40 CFR Part 60, to certify the as-supplied VOC content of a coating if the manufacturer or the owner or operator has determined that batch formulation data have a consistent and quantitatively known relationship to Method 24 results. Certification of VOC content for each batch of as-supplied coating shall be documented in accordance with Appendix A to Subpart II of Part 63 – VOC Data Sheet, or alternate format, provided the form includes all required data.
   [40 CFR 63.786(c),40 CFR 63, Subpart II, Appendix A, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Monitoring of Operations

8. BAE Systems Southeast Shipyards shall comply with the compliance procedure provisions in accordance with 40 CFR 63.785.

9. Records shall be compiled on a monthly basis in accordance with 40 CFR 63.788 for all surface coating operations for the following:

   a. Volume of each low-usage exempt coating
   b. Identification of the coatings used, coating category and applicable VOHAP limit
   c. Certification of as-supplied VOC content of each batch of coating or the results of EPA RM 24
   d. Documentation supporting initial notification
   e. Copy of implementation plan
   f. Determination of whether containers meet standards

   Records shall be maintained for a minimum of five (5) years and made available to the Permitting Authority upon request.
   [Rule 62-213.440(1)(b), FAC, and Rule 2.501, JEPB]

10. A report in accordance with 40 CFR 63.788(c), shall be submitted to the Permitting Authority before the 60th day following completion of each 6-month period after the effective date of this permit.
    [Rule 62-213.440(1)(b), FAC, and Rule 2.501, JEPB]

Reasonable Assurances

11. Best Management Practices (BMP), shall be used to minimize paint over spray and the BMP shall include, but not limited to the use of high velocity, low pressure air guns, airless paint guns, brush or roll paint application where practicable, and employee awareness training.
    [Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

Emissions Unit No. 019 – Abrasive Blast Booths

Emissions Unit Description: Two blast (MF and MROC) booths for abrasive blasting of metal parts.

Particulate Matter (PM) Control Device: Fabric Filter Dust Collector per booth.

Essential Potential to Emit (PTE) Parameters

1. This emissions unit is allowed to operate continuously, i.e., 8,760 hrs/yr.
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

2. The nominal volumetric flow rate is as follows:

	Cubic feet per minute
MROC Blast Booth	**60,000**
MF Blast Booth	**9,500**

[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. PM emissions shall not exceed 0.03 grains per dry standard cubic foot and as follows:

	Pounds per hour	Tons per year
MROC Blast Booth	15.43	67.58
MF Blast Booth	2.44	10.70

[Rule 62-296.712(2), FAC, and 2.1101, JEPB]

4. VE shall not exceed 5 percent opacity.
[Rule 62-296.712(2), FAC, and 2.1101, JEPB]

Test Methods and Procedures

5. Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA RM 5 (as described in 40 CFR 60, Appendix A) for particulate matter.
[Rule 62-296.712(3)(b), FAC, and Rule 2.1101, JEPB]

6. Testing for demonstration of compliance shall be performed in accordance with EPA RM 9 (as described in 40 CFR 60, Appendix A) for the visual determination of opacity. Testing shall be conducted annually, for a minimum period of 30 minutes.
[Rule 62-297.310(4)(a)2., FAC, and Rule 2.1201, JEPB]

7. VE shall be tested annually from the date of October 1, 2011 for each blast booth.
[Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

Recordkeeping and Reporting Requirements

8. Quarterly abrasive blasting reports shall be submitted to the Permitting Authority no later than the 20th day of the month following the end of each calendar quarter. The reports shall contain the following information.

   a. Type of blast media
   b. Amount of make up blast media

   [Rule 62-213.440(1)(b), FAC, and Rule 2.501, JEPB]

Emissions Unit No. 020 – Indoor Surface Coating Booths

Emissions Unit Description: Two booths used for surfaced coating of steel plate and ship parts. Surface coating is conducted manually using airless/high velocity low pressure spray paint application of coatings as needed. Booths are equipped with paint arrestor filters to control PM resulting from paint overspray.

Essential Potential to Emit (PTE) Parameters

1. This emissions unit is allowed to operate continuously, i.e., 8,760 hrs/yr.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. The maximum allowable VOC emissions from this EU shall not exceed 175.88 tons/yr. (Applicant's request).
[Permit No. 031258-009-AV, Rule 62-212.400, FAC, and Rule 2.401, JEPB]

3. The owner or operator shall comply with the provisions of 40 CFR 63, Subpart II – National Emission Standards for Shipbuilding and Ship Repair (Surface Coating), and 40 CFR 63, Subpart A – General Provisions (as described in Table 1 to Subpart II of Part 63 – General Provisions of Applicability to Subpart II).

4. The application of any surface coatings at a shipbuilding or repair facility shall not exceed VOHAP contents, as applied, pursuant to Table 2 to Subpart II of Part 63 – Volatile Organic HAP (VOHAP) Limits for Marine Coatings.
   [40 CFR 63.783, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

5. Surface coatings applied to miscellaneous metal parts and products other than the exterior of a marine vessel shall not exceed a maximum VOC content of 3.5 pounds per gallon, excluding water pursuant to Rule 62-296.513(2)(a)2., FAC, and Rule 2.1101, JEPB. Surface coatings applied to the exterior of a marine vessel are exempt from any RACT VOC content limitation.
   [Rule 62-296.513(1)(b)10., FAC, and Rule 2.1101, JEPB]

Test Methods and Procedures

6. For each batch of coating received by the permittee, demonstration of compliance shall be determined by using the procedures in 63.785(a) or (b). The permittee may test each batch of coating, may use a certification supplied by the manufacturer for the batch, or may use any combination of three compliance procedure options described in 63.785(c)(1) through (c)(4). See Appendix CP for a flow diagram of the compliance procedure options.
   [40 CFR 63.785, Rule 62.204.800, FAC, and Rule 2.201 JEPB]

7. Batch formulation data may be used as a test method in lieu of Method 24 of Appendix A to 40 CFR Part 60, to certify the as-supplied VOC content of a coating if the manufacturer or the owner or operator has determined that batch formulation data have a consistent and quantitatively known relationship to Method 24 results. Certification of VOC content for each batch of as-supplied coating shall be documented in accordance with Appendix A to Subpart II of Part 63 – VOC Data Sheet, or alternate format, provided the form includes all required data.
   [40 CFR 63.786(c), 40 CFR 63, Subpart II, Appendix A, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Monitoring of Operations

8. BAE Systems Southeast Shipyards shall comply with the compliance procedure provisions in accordance with 40 CFR 63.785.

9. Records shall be compiled on a monthly basis in accordance with 40 CFR 63.788 for all surface coating operations for the following:

   a. Volume of each low-usage exempt coating
   b. Identification of the coatings used, coating category and applicable VOHAP limit
   c. Certification of as-supplied VOC content of each batch of coating or the results of EPA RM 24
   d. Documentation supporting initial notification
   e. Copy of implementation plan
   f. Determination of whether containers meet standards

   Records shall be maintained for a minimum of five (5) years and made available to the Permitting Authority upon request.

[Rule 62-213.440(1)(b), FAC, and Rule 2.501, JEPB]

10. A report in accordance with 40 CFR 63.788(c), shall be submitted to the Permitting Authority before the 60th day following completion of each 6-month period after the effective date of this permit.
[Rule 62-213.440(1)(b), FAC, and Rule 2.501, JEPB]

Emissions Unit No. 021 – Portable Grit Silos

Emissions Unit Description: Portable silos are used for storage of blast media. A portable dust collector is connected to each silo for control of PM emissions.

Essential Potential to Emit (PTE) Parameters

1. The maximum silo input rate (each silo) shall not exceed 30 tons per hour. The maximum annual throughput rate shall be limited to 20,500 tons/yr.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

2. The nominal volumetric flow rate from this emissions unit is 3,000 cubic feet per minute.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

3. This emissions unit is allowed to operate continuously, i.e., 8,760 hrs/yr.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

4. PM emissions shall not exceed 0.03 grains per dry standard cubic foot.
[Rule 62-296.711(2)(b), FAC, and Rule 2.1101, JEPB]

5. VE shall not exceed 5 percent opacity.
[Rule 62-296.711(3)(c), FAC, and Rule 2.1101, JEPB]

Test Methods and Procedures

6. Testing for demonstration of compliance, upon request, shall be performed in accordance with EPA RM 5 (as described in 40 CFR 60, Appendix A) for particulate matter.
[Rule 62-296.711(3)(b), FAC, and Rule 2.1101, JEPB]

7. Testing for the demonstration of compliance shall be performed in accordance with EPA RM 9 (as described in 40 CFR 60, Appendix A) for the visual determination of opacity. Testing shall be conducted on one silo annually, for a minimum period of 30 minutes.
[Rule 62-297.310(4)(a)2., FAC, and Rule 2.1201, JEPB]

8. VE shall be tested on one abrasive blast media silo annually from the date of October 1, 2011.
[Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

Source Commitments

9. The portable dust collector shall be connected to, and operating prior to and during any silo loading operation.
[Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

Recordkeeping and Reporting Requirements

10. Records shall be maintained quarterly for the throughput of the grit silos. Records shall be maintained for two (2) years and made available to the Permitting Authority upon request.
[Rule 62-296.700(6), FAC, and Rule 2.1101, JEPB]

Emissions Unit No. 022 – Administrative Building Emergency Diesel Engine

Emissions Unit Description: Emergency Diesel Engine for the administrative building computer server fired with No. 2 fuel oil.

Description of Engine	Year Built	Displacement/ Horsepower	Rule Applicability
94 KW Sentry-Pro Power Systems by Gillette Generators, Inc. Emergency Generator	2010	1.13 Liters/Cylinder & 126 HP	40 CFR Part 60, Subpart IIII

{**Permitting Note:** This permit section addresses new, emergency stationary compression ignition (CI) reciprocating internal combustion engines (RICE) manufactured after April 1, 2006 with a site rating of less than 500 HP and an engine displacement of less than 10 liters per cylinder located at a major source of HAP emissions.}

1. This engine is subject to 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 60, Subpart A, General Provisions.
[40 CFR 63.6590(c), Rule 62-204.800(8) & (11), FAC and Rule 2.201, JEPB]

Emission Limitations and Standards

2. The engine in this emission unit shall not exceed the following standards of non-methane hydrocarbon + NO_X, carbon monoxide, and particulate matter:

Engine	Non-Methane Hydrocarbon + NO_x	CO	PM
94 KW Sentry-Pro Power Systems by Gillette Generators, Inc. Emergency Generator	4.0 Grams/kW-Hr	5.0 Grams/kW-Hr	0.30 Grams/kW-Hr

[40 CFR 89.112(a)]

3. Beginning October 1, 2010, owners and operators of stationary combustion ignition internal combustion engines subject to 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines with a displacement of less than 30 liters per cylinder that use diesel fuel must purchase diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. The sulfur content for nonroad diesel fuel shall not exceed 15 ppm, the nonroad diesel cetane index shall not be less than 40 or the aromatic content shall not exceed 35 volume percent.
[40 CFR 60.4207, Rule 62-204.800(8), FAC and Rule 2.201, JEPB]

Monitoring Requirements

4. If you are the owner or operator of an emergency stationary combustion ignition internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.
[40 CFR 60.4209(a), Rule 62-204.800(8), FAC and Rule 2.201, JEPB]

Compliance Requirements

5. The owner or operator must operate and maintain the stationary combustion ignition internal combustion engine that achieves the emission standards as required in 60.4205 over the entire life of the engine.
[40 CFR 60.4206, Rule 62-204.800(8), FAC and Rule 2.201, JEPB]

6. Maintenance checks and readiness testing of emergency stationary combustion ignition internal combustion engines is limited to 100 hrs/yr. These engines may operate up to 50 hrs/yr in non-emergency situations, but those 50 hours are counted towards the 100 hrs/yr provided for maintenance and testing.
[40 CFR 60.4211(f), Rule 62-204.800(8), FAC and Rule 2.201, JEPB]

7. The owner or operator must operate the stationary combustion ignition internal combustion engines and control devices according to the manufacturer's emission-related written instructions.
[40CFR 60.4211(a)(1), Rule 62-204.800(8), FAC and Rule 2.201, JEPB]

8. The owner or operator shall only change those emission-related settings that are permitted by the manufacturer.
[40CFR 60.4211(a)(2), Rule 62-204.800(8), FAC and Rule 2.201, JEPB]

9. If the owner or operator of a stationary combustion ignition internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP does not install, configure, operate and maintain the stationary combustion ignition internal combustion engine and control device according to the manufacturer's emission-related written instructions, or changes emission-related settings in a way that is not permitted by the manufacturer, the owner or operator must demonstrate compliance performing the following:

   a. Keep a maintenance plan and records of conducted maintenance
   b. Maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
   c. Conduct an initial performance test to demonstrate compliance with the applicable emission standards:

      (i) Within 1 year of startup or
      (ii) Within 1 year after an engine and control device is no longer installed, configured, operated and maintained in accordance with the manufacturer's emission-related written instructions or

(iii) Within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.
[40 CFR 60.4211(g)(2), Rule 62-204.800, FAC and Rule 2.201, JEPB]

Recordkeeping and Reporting Requirements

10. If the stationary combustion ignition internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high back pressure limit of the engine is approached.
[40 CFR 60.4214(c), Rule 62-204.800(8), FAC and Rule 2.201, JEPB]

11. Records shall be maintained for the hours of operation of the stationary combustion ignition internal combustion engines for maintenance checks and readiness. In addition, records shall be maintained for non-emergency engine usage. These records shall be kept and maintained for a minimum period of 5 years. Records shall be provided to the Permitting Authority upon request.
[Rule 62-4.070(3), FAC, and Rule 2.1401, JEPB]

Emissions Unit No. 023 – Domestic Wastewater Treatment Plant Emergency Diesel Engine

Emissions Unit Description: Emergency Diesel Engine for the Domestic Wastewater Treatment Plant fired with No. 2 fuel oil.

Description of Engine	Year Built	Cylinders/ Horsepower	Rule Applicability
Cummins Engine 6AT3.4-C w/ Emergency Generator	1989	6 Cylinders/71 HP	40 CFR Part 63, Subpart ZZZZ

{**Permitting Note:** The engine listed above is an existing, emergency stationary combustion ignition reciprocating internal combustion engine constructed prior to June 12, 2006 with a site rating of less than 500 brake horsepower (HP) and with an engine displacement of less than 10 liters per cylinder located at a major source of HAP emissions.}

1. 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and 40 CFR 60, Subpart A, General Provisions shall apply to the engines of this emissions unit.
[40 CFR 63.6585, Rule 62-204.800(11), FAC and Rule 2.201, JEPB

2. The permittee shall comply with the following operating limitations no later than May 3, 2013.
[40 CFR 63.6595(a), Rule 62-204.800(11), FAC and Rule 2.201, JEPB]

Emission Limitations and Operating Requirements

3. The owner or operator shall comply with the following requirements as outlined in 40 CFR 63, Subpart ZZZZ, Table 2c.

   a. Change oil and filter every 500 hours of operation or annually, whichever comes first.
   b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.
   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

   [40 CFR 63.6602, Rule 62-204.800(11), FAC and Rule 2.201, JEPB

4. The owner or operator has the option of using oil analysis to extend the oil change requirement. The oil analysis shall be performed at the same frequency specified for changing the oil in Specific Condition No. 3 for this emissions unit. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or

   before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.
   [40 CFR 63.6625(i), Rule 62-204.800(11), FAC and Rule 2.201, JEPB]

5. The owner or operator shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
   [40 CFR 63.6625(h), Rule 62-204.800(11), FAC and Rule 2.201, JEPB]

6. The owner or operator shall operate and maintain the emergency diesel engine for the domestic wastewater treatment plant and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions
   [40 CFR 63.6625(e)(2), Rule 62-204.800(11), FAC and Rule 2.201, JEPB

Monitoring Requirements

7. The owner or operator shall install a non-resettable hour meter if one is not already installed.
   [40 CFR 63.6625(f), Rule 62-204.800(11), FAC and Rule 2.201, JEPB]

Compliance Requirements

8. Each unit shall be in compliance with the operating standards in this section at all times.
   [40 CFR 63.6605(a), Rule 62-204.800(11), FAC and Rule 2.201, JEPB]

9. At all times the owner or operator must operate and maintain the stationary reciprocating internal combustion engine constructed, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the compliance authority which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
   [40 CFR 63.6605(b), Rule 62-204.800(11), FAC and Rule 2.201, JEPB]

10. The owner or operator shall operate and maintain the emergency stationary reciprocating internal combustion engine constructed according to the following:

    (a) There is no time limit on the use of emergency stationary reciprocating internal combustion engine constructed in emergency situations.

(b) You may operate your emergency stationary reciprocating internal combustion engine constructed for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hrs/yr.

(c) You may operate your emergency stationary reciprocating internal combustion engine constructed up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hrs/yr.

(d) The 50 hours per year for non-emergency situations may not be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity.

[40 CFR 63.6640(f), Rule 62-204.800(11), FAC and Rule 2.201, JEPB]

Recordkeeping and Reporting Requirements

11. The owner or operator shall keep records of the maintenance conducted on the stationary reciprocating internal combustion engine constructed in order to demonstrate that the stationary reciprocating internal combustion engine constructed and after-treatment control device (if any) was operated and maintained according to their own maintenance plan.
[40 CFR 63.6655(e), Rule 62-204.800(11), FAC and Rule 2.201, JEPB]

12. The owner or operator shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator shall keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.
[40 CFR 63.6655(f), Rule 62-204.800(11), FAC and Rule 2.201, JEPB]

13. The records in Specific Condition Nos. 11 and 12 for this EU shall be kept and maintained for a minimum period of five (5) years. Records shall be provided to the Permitting Authority upon request.
[40 CFR 63.6660, Rule 62-204.800(11), FAC and Rule 2.201, JEPB]

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