U.S. Navy
Naval Air Station (NAS) Pensacola
Facility ID No.: 0330082
Escambia County

Title V Air Operation Permit Revision

FINAL Permit No.: 0330082-011-AV
Revision to Title V Air Operation Permit No.: 0330082-009-AV

Permitting and Compliance Authority:
Florida Department of Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, FL 32502-5740

Telephone: 850/595-8300
Fax: 850/595-8096

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Florida Department of Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Permittee:
U.S. Navy
Naval Air Station (NAS) Pensacola
310 John Towers Road
Pensacola, Florida 32508-5217

FINAL Permit No.: 0330082-011-AV
Facility ID No.: 0330082
SIC No(s).: 97, 9711
Project: Title V Air Operation Permit Revision

This permit revision is being issued for the purpose of removing the housing operations from Title V Permit No. 0330082-009-AV. This facility is located at Naval Air Station (NAS) Pensacola, 310 John Towers Road, Pensacola, Escambia County; UTM Coordinates: Zone 17, 472.8 km East and 3364.8 km North; and, Latitude: 30° 25' North and Longitude: 87° 17' West.

This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. 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:
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6, TITLE V CONDITIONS version dated 06/23/06
Appendix A – 40 CFR 60 subpart A – General Provisions (supplied upon request)
Appendix M – 40 CFR 61 subpart M – Asbestos (supplied upon request)
Appendix Housing Operations

Initial Effective Date: August 4, 2009
Revision Effective Date: June 23, 2011
Renewal Application Due Date: January 1, 2014
Expiration Date: August 4, 2014

/s/

Rick Bradburn
Air Program Administrator

RB/tkdm/c

Section I. Facility Information.

This permit is for the purpose of revising Title V Air Operation Permit No. 0330082-009-AV by removing the housing operations from Title V Permit No. 0330082-009-AV. Family housing operations potentially open to the general public, which are owned and maintained by a private lessee on the installation and which are not under the direct control of the installation commander, are excluded from the group of emissions units that define the Facility. Family housing operations generally fall under NAICS code 561790 (Other Services to Buildings and Dwellings). Family housing operations excluded from air pollution sources of Naval Air Station, Pensacola are located on leased portions of the installation as represented on the map in Appendix Housing Operations. Notwithstanding the above, individual emissions units that are owned and operated by the installation in the leased area remain as part of the Facility and are included in this permit.

Subsection A. Facility Description.

The primary mission of the NAS Pensacola Complex is to provide training of Navy, Marine and Air Force personnel. Several training commands are located at this base, including Naval Education Training Command (NETC). The Public Works Department (PWD) provides public works support to all tenants on NAS Pensacola. Its operations include maintenance, repair, construction, utilities, transportation services, engineering services and shore facilities planning.

NAS Pensacola Complex is a Naval Training Facility which provides training of aircraft crews and commands, supports fleet and shore-based personnel, maintains and operates the base facilities and provides services and materials to support operation of the base aviation and port activities. Air pollutant emitting activities associated with NAS result from facilities required for the training activities such as fuel storage tanks; fuel burning equipment such as boilers, heaters, and emergency generators; and maintenance requirements such as aircraft engine test stands. The PWD maintains support facilities, such as the boiler plants and other facilities.

This facility consists of a single 16.8 MMBtu/hr natural gas fired hot water heater and 19 natural gas fired steam boilers totaling 61.65 MMBtu/hr.

Facility-Wide Emission Estimates:

Pollutant	Actual Emissions (TPY)	Potential Emissions Facility Wide Fuel Cap (TPY)	Primary Source of Emissions
NO_x	20.4	175.4	Combustion
CO	12.3	63.6	Combustion
SO_2	1.1	12.4	Combustion
VOC	21.2	47.3	Fuel Storage Tanks
PM	3.5	14.3	Combustion
HAP	3.4	6.9	Fuel Storage Tanks

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

Based on the initial Title V Air Operation Permit application received June 13, 1996, this facility is not a major source of hazardous air pollutants (HAP).

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

E.U. ID No.	Brief Description
EU 027	16.8 MMBTU/hr Hot Water Boiler, NSPS
EU 039	19 Natural Gas fired steam Boilers totaling 61.65 MMBtu/hr

Unregulated Emissions Units and/or Activities

EU 040	58 Hot Water Boilers/heaters totaling 144.09 MMBtu/hr
EU 041	Seven gasoline storage tanks
EU 042	Two Jet Engine Test Stands
EU 044	Seven Emergency Back-up Generators

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
Statement of Basis
Appendix TV-6

These documents are on file with the permitting authority:
Initial Title V Air Operation Permit issued January 26, 1999
Appendix H-1: Permit History
Application for a Title V Air Operation Permit Revision received November 1, 2010
Additional Information Request dated December 13, 2010
Additional Information Response received March 10, 2011

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C., and permits 0330082-007-AC and 0330082-010-AC]

3. 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). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C., and permits 0330082-007-AC and 0330082-010-AC]

4. Prevention of Accidental Releases (Section 112(r) of CAA).
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), F.A.C.
[40 CFR 68]

5. An annual operating report for air pollutant emitting facility, DEP Form 62-210.900(5), shall be submitted by April 1 of each year. A copy of the form and instructions may be obtained from the Department's Northwest District Office. [Rule 62-210.370, F.A.C., and permit 0330082-007-AC]

6. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit. [Rule 62-213.440(1), F.A.C.]

7. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit. [Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

8. 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 process or installation, volatile organic

compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

a. Tightly cover or close all VOC containers when they are not is use,
b. Tightly cover, where possible, all open troughs, basins, baths, tanks, etc., when they are not in use,
c. Maintain all piping, valves, fittings, etc. in good operating condition,
d. Prevent excessive air turbulence across exposed VOC,
e. Immediately confine and clean up VOC spills and make sure appropriate wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1), F.A.C., and permit 0330082-007-AC]

9. Emissions of Unconfined Particulate Matter. Pursuant to Rule 62-296.320(4)(c), F.A.C., and the application, this facility has **no** emissions of unconfined particulate matter (see Condition 57 of APPENDIX TV-6, TITLE V CONDITIONS).
[Rule 62-296.320(4)(c), F.A.C.; Title V Air Construction Permit No. 0330082-007-AC, effective February 10, 2005 and renewal Title V permit application received August 5, 2008]

10. Fuel Consumption. The facility shall maintain records of the quantity of pipeline quality natural gas consumed. These records shall be maintained on site, and made available for Department inspection as necessary. [Rule 62-4.070, 62-204.800(7)(b)4, F.A.C., 40CFR 60.48c, Permit 0330082-007-AC and renewal Title V Permit application received August 5, 2008]

11. Facility Wide Fuel Usage Cap. The facility shall not exceed a facility-wide natural gas fuel usage capacity limit of 385 million cubic feet per year. [Rule 62-4.070, F.A.C.; permit 0330082-010-AC]

{Permitting Note: The facility wide emission cap of 385 million cubic feet of natural gas was requested by the Permittee to help simplify record keeping while maintaining the facility as a minor for PSD.}

12. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. [Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51 of APPENDIX TV-6, TITLE V CONDITIONS)}

13. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office.

Florida Department of Environmental Protection
Northwest District Air Resource Management Program
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300; Fax: 850/595-8096

14. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4

Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

15. 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), F.A.C.]

16. Permittee shall comply with all requirements of 40 CFR 61 subpart M, during any asbestos renovation and demolition activities at this facility. [Rule 62-204.800(10)(b)8., F.A.C.]

17. Permittee shall comply with all requirements of 40 CFR 82 subparts B and F. These subparts have been adopted by Florida Statute 62-204.800(24)(b) and (e) but the FDEP has not been delegated the authority by EPA to enforce these standards. [Rule 62-204.800(24)(b) and (e), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

E.U. ID No.	Brief Description
027	16.8 MMBtu/hr Natural Gas fired Hot Water Boiler, NSPS

One boiler (Kewanee, model L3W 400G, ID# EC034, located in building 3460), fueled by natural gas with a maximum rated heat input of 16.8 MMBtu/hr. This boiler provides hot water for training facilities located at Chevalier Field, NAS Pensacola. Construction of this boiler was authorized by permit AC 17-258523 issued February 6, 1995. This boiler is subject to 40CFR Part 60, subpart Dc, but not subject to Rule 62-296.406, F.A.C., since the unit is not a steam generating boiler but a hot water generator. Because of the unit's size and the combustion of natural gas only, the only applicable requirements contained in 40CFR Part 60, subpart Dc are fuel usage monitoring and recordkeeping. This boiler falls under the permittee requested facility wide fuel usage limit of 385 MMCFT/yr. A Permittee imposed facility wide fuel usage capacity limit of 385 MMCFT/yr which includes this boiler is specified in order to be a minor source for PSD and to simplify record keeping.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The operation rate shall not exceed 16.8 MMBtu/hr heat input. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; construction permit AC17-25823 issued February 6, 1995]

A.2. Methods of Operation. This boiler shall be operated using only pipeline quality natural gas. [Rule 62-213.410 and 440, F.A.C; construction permit AC17-258523 issued February 6, 1995; requested by applicant in application received November 12, 2004]

A.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; construction permit AC17-258523 issued February 6, 1995]

Emission Limitations and Standards

A.4. Visible emissions shall not equal or exceed 20% opacity. [Rule 62-4.070, F.A.C.; construction permit AC17-258523 issued February 6, 1995]

Test Methods and Procedures

A.5. Emissions Tests. A visible emissions test shall be conducted during federal fiscal year 2013 (October 1 – September 30). [Rule 62-297.310(7), F.A.C.]

A.6. Visible Emissions. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Rule 62-297, F.A.C. The test period shall be a minimum of 30 minutes. [Rule 62-297.401, F.A.C.]

40 CFR Part 60, Subpart A - General Provisions Requirements

A.7. Permittee shall comply with applicable parts of 40 CFR Part 60, subpart A, as an affected facility subject to 40 CFR Part 60, subpart Dc. [Rule 62-204.800(8)(d), F.A.C.; 40 CFR 60.1]

This emissions unit is also subject to conditions C.1 through C.6 contained in Subsection C, **Common Conditions.**

Section III. Emissions Units and Conditions.

Subsection B. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
039	19 Natural Gas fired steam Boilers totaling 61.65 MMBtu/hr

Nineteen boilers ranging from 1.3 to 6.3 MMBtu/hr fueled by pipeline quality natural gas with a total heat input of 61.65 Btu/hr. The 19 boilers are subject to the BACT requirements of Rule 62-296.406, F.A.C., which are satisfied by the use of pipeline quality natural gas. The former fuel usage cap of 310 MMCFT/yr for this EU has been replaced with a facility-wide fuel usage capacity limit of 385 MMCFT/yr of natural gas which allows the facility to remain a minor source for PSD.

The ID numbers, location, boiler description, and maximum heat input of the boilers are identified as follows:

ID NO.	BLDG NO.	DESCRIPTION	UNIT MAKE	MODEL NO.
EC018	1907	2.5 MMBtu/hr STM Boiler	Industrial	M11FDH60
EC032	3644	3.0 MMBtu/hr STM Boiler	Raypak	H23001N1P
EC033	3241	5.25 MMBtu/hr STM Boiler	Hurst	S6251503
EC096	3900	6.3 MMBtu/hr STM Boiler	Kewanee	H3S150G
EC138	0225	1.3 MMBtu/hr STM Boiler	Hurst	S2G30150
EC139	0628	2.1 MMBtu/hr STM Boiler	Hurst	S2G50150
EC142	0781-b	4.2 MMBtu/hr STM Boiler	Hurst	S4G100150
EC143	0781-1	4.2 MMBtu/hr STM Boiler	Hurst	S4G100150
EC145	3561	2.1 MMBtu/hr STM Boiler	NAv	NAv
EC163	3933	3.4 MMBtu/hr STM Boiler	Hurst	S2G80150
EC164	3933	3.4 MMBtu/hr STM Boiler	Hurst	S2G80150
EC167	0603	2.5 MMBtu/hr STM Boiler	Hurst	NAv
EC168	0603	2.5 MMBtu/hr STM Boiler	Hurst	NAv
EC174	3938	2.1 MMBtu/hr STM Boiler	Hurst	S2G50150
EC184	0038	1.7 MMBtu/hr STM Boiler	Hurst	S3G40150
EC213	3938	2.1 MMBtu/hr STM Boiler	Hurst	S2G50150
EC215	3241	5.25 MMBtu/hr STM Boiler	Hurst	S6251503
EC216	3241	5.25 MMBtu/hr STM Boiler	Hurst	S6251503
EC222	0634	2.5 MMBtu/hr STM Boiler	Hurst	S2G50150
TOTAL	19 units	61.65 MMBtu/hr		

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The combined operation rate for all boilers shall not exceed 61.65 MMBtu/hr heat input. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0330082-007-AC]

B.2. Methods of Operation. These boilers shall be operated using only pipeline quality natural gas. [Rule 62-213.410 and 440, F.A.C.; construction permit AC17-258523 issued February 6, 1995; requested by applicant in application received November 12, 2004]

B.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; construction permit AC17-258523 issued February 6, 1995]

Emission Limitations and Standards

B.4. Visible emissions shall not equal or exceed 20% opacity. [Rule 62-4.070, F.A.C.; construction permit AC17-258523 issued February 6, 1995]

{Permitting Note: The above VE limit is more stringent than the required limit in Rule 62-296.406, F.A.C., by request of the applicant.}

Test Methods and Procedures

B.5. Emissions Tests. A visible emissions test shall be conducted during federal fiscal year 2013 (October 1 – September 30) on a representative number of boilers characterizing the range of heat inputs for this emission unit. These boilers shall include:

NAS ID	Heat Range	Boiler size
EC096	5-10 MMBtu/hr	6.3 MMBtu/hr
EC033		5.25 MMBtu/hr
EC142	1-5 MMBtu/hr	4.2 MMBtu/hr
EC163		3.4 MMBtu/hr
EC167		2.5 MMBtu/hr
EC138		1.3 MMBtu/hr

If any of the above boilers are not available for testing, an alternate boiler may be used, with prior Department approval.
[Rule 62-297.310(7), F.A.C.]

B.6. Visible Emissions. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Rule 62-297, F.A.C. The test period shall be a minimum of 30 minutes. [Rule 62-297.401, F.A.C.]

This emissions unit is also subject to conditions C.1 through C.6 contained in Subsection C, **Common Conditions.**

Section III. Emissions Units and Conditions.

Subsection C. Common Conditions.

E.U. ID No.	Brief Description
027	16.8 MMBtu/hr Hot Water Boiler, NSPS
039	19 Natural Gas fired steam Boilers totaling 61.65 MMBtu/hr

The following conditions apply to the emissions units listed above:

{Permitting Note: The following conditions are placed here as a convenience and to avoid duplication. See Subsections A and B for applicability.}

C.1. Test Methods and Procedures
Emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Visible emission tests shall be conducted once during federal fiscal year 2013 (October 1 – September 30), or as otherwise specified by specific condition. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing. [Rule 62-297.310, F.A.C.]

Testing of emissions shall be conducted with the emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted, provided however, operations do not exceed 100 percent of the maximum operation rate allowed by the permit. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rules 62-297.310(2) & (2)(b), F.A.C.]

C.2. Excess Emissions
Excess emissions resulting from startup, shutdown or malfunction of any emissions unit 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 Department for longer durations.

Excess emissions from existing fossil fuel steam generators resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

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 case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700, F.A.C.]

C.3. Special Compliance Tests
When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310, F.A.C.]

Monitoring of Operations

C.4. Determination of Process Variables
(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5), F.A.C.]

Record Keeping and Reporting Requirements

C.5. Permittee shall maintain a record of fuel consumption showing monthly facility usage and 12-month rolling total. Approximate fuel consumption based on hours of operation may be used for individual EUs. The records shall be maintained on site and made available as necessary for Department inspection. [Rule 62-4.070, F.A.C.]