Florida Department of Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Angelia Jackson
DATE: September 24, 2012
SUBJECT: Evaluation Summary for USAF Hurlburt Field, 0910064-011-AF, Okaloosa County

We recommend issuing a renewal permit to USAF Hurlburt Field. This is a renewal of permit 0910064-008-AF, effective September 5, 2007. Due to adoption of new rules the facility's diesel-fired emergency generators became subject to 40 CFR 60 subpart IIII and/or 40 CFR 63 subpart ZZZZ for area sources. These new requirements are incorporated into this renewal permit. This permit also modifies previously established facility-wide VOC and NOx emissions limits of 41.2 and 16.9 tons per year, respectively, which were originally requested by the facility to remain below Title V thresholds. Therefore, this FESOP is being public-noticed per Rule 62-210.300(2)(b)1.b. The Transportable Plasma Waste to Energy System (TPWES) permitted under 0910064-009-AC, effective October 1, 2009, was constructed but due to operational difficulties was not run at capacity or tested. The TPWES emissions unit has been made inactive and permit 0910064-009-AC has been rescinded.

Process Description. This facility consists of an aircraft engine testing facility, auxiliary generators used for training activities, several paint booths and a 20,000-gallon JP-8 fuel storage tank.

Several activities are exempt from permitting: MUR tanks at vehicular refueling stations; small diesel and jet fuel storage tanks; multiple natural gas boilers with heat inputs between 1.05 and 5.44 MMBtu/hr with total natural gas consumption less than 375 MMCF per year; and, an 845,000-gallon JP-8 storage tank in the POL yard installed in 1954.

Pollution Control Equipment. Facility-wide fuel throughput is limited to 50,000,000 gallons of jet fuel and 1,000,000 gallons of diesel per consecutive 12-month period. Aircraft engine testing is limited to the consumption of 62,500 gallons of jet fuel per consecutive 12-month period. The total quantity of surface coating applied at the paint booths is limited to 4,600 gallons per consecutive 12-month period. Auxiliary generator power production at the training exercise facility is limited to 1,880,000 kW hours per consecutive 12-month period.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	N/A	4.62	N/A	<100
SO2	N/A	N/A	4.02	N/A	<100
VOC	N/A	N/A	29.2	N/A	<90
NOx	N/A	N/A	78.7	N/A	<90
CO	N/A	N/A	7.05	N/A	<100
HAP (indiv)	N/A	N/A	N/A	N/A	<10.0
HAP (total)	N/A	N/A	N/A	N/A	<25.0
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	N/A	N/A	N/A	Not more than 20% opacity	

Applicable Rules & Regulations.
This source is regulated in accordance with Rules 62-296.320 and 62- 210.300, F.A.C., to include FESOP requirements and exemptions. Due to adoption of new rules, the facility's diesel-fired emergency generators became subject to 40 CFR 60 subpart IIII and/or 40 CFR 63 subpart ZZZZ for area sources.

In the application the facility stated it could be subject to 40 CFR 63 subpart HHHHHH (6H) – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at area sources, if certain HAPs were contained in materials used in stripping and coating operations. The applicant stated Hurlburt Field does not use any chemical strippers that contain MeCl, and also stated the facility maintains MSDS for all coatings used on-site to document that no coatings containing Cr, Pb, Mn, Ni or Cd are applied in the spray paint booths. The Department has not adopted this federal standard as of September 2012. Furthermore, 40 CFR 63 subpart 6H states in §63.11169(d) (1) & (2) that the subpart does not apply to Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States. Therefore, 40 CFR 63 subpart 6H was not included in this permit.

Compliance Monitoring. Record keeping of paint and fuel usage, power generation, and VOC and NOx emissions.

Compliance History. Inspections for 2012 - 2008 – The facility noted, "In Compliance."

Fee Summary. This is an AF2C ($3,000 fee) minor source with no stack test for four emissions units.

AJ/c