January 27, 2000

Lt. Col. Arvil E. White III
Commander, 325th Civil Engineer Squadron
119 Alabama Ave
Tyndall Air Force Base FL 32403-5014

Dear Col. White:

Following a review of your response (received 1/6/00) to our incompleteness letter (dated 10/15/99) and further discussions with your staff, we conclude that we need additional information and clarification in order to complete the processing of your FESOP application No. 005024-006-AF. Please provide the following information:

1. From discussions with your staff, we have learned that the jet engine testing performed at sources 258-JET-1 and 325-JET-1 are not automated, but rather under the control of the personnel conducting the testing. Since emissions are strongly influenced by both the engine power settings and the duration of testing at each power setting, please certify that the profiles submitted in your application represent worst case test conditions for emissions, and a method of record-keeping that would provide continuing assurance that these profiles are not exceeded during actual tests. If this is not practicable, or if the worst case profile would generate emissions exceeding the requested base-wide emissions limits, we request that you propose other reliable methods of record-keeping that would allow a reliable method for calculating cumulative actual emissions during the course of the year for the engine test facilities. Please add descriptions regarding the type and size of the engines being tested at each facility. (Please note that the SCC (20400499) used in Part III F (325-JET-1), under item 2, does not appear to be correct.)

2. Also with respect to these two jet engine testing facilities, under Section III H, the entry under Emissions Factor Reference is given as Air Force. Please provide an explanation of this and copies of the relevant pages of the cited reference to support the emissions factors used.

3. In order to make the permit practically enforceable, we anticipate establishing an upper limit on the number of engine tests allowed at each of the two test facilities in the new FESOP. In the attached draft permit we have used the number of tests that are in your FESOP application that was used as the basis for calculating actual emissions. Since these test limits represent one-year experience, please assure your self that these limits will allow for normal year to year fluctuations plus some reasonable reserve for unexpected activities. Otherwise, provide your request for an appropriate number of tests, by each test facility that, when taken into account with the other permitted activities, would not exceed the requested facility-wide emissions limits.

4. In comparing your FESOP application with your permit No. 0050024-002-AF, we note that the emissions unit listed under Section III Subsection F -Non Destructive Testing of the existing permit was not included in your application. If still applicable, please provide the relevant additional application pages for this emissions source.

5. Under Emissions Unit Information Section 30, AFRL Explosive Research, you have requested that this activity be exempt from the permitting process. However, no basis has been provided for this exemption. Based on the number of annual tests conducted (260) and the size of the explosive charges (1000 lbs), this activity may have the potential of generating large quantities of unconfined PM emissions. Please provide additional information about these tests related to their potential for environmental impacts to include, at a minimum, information on the potential to generate PM (the test site distance from the closest base boundary, proximity to any State surface waters, natural or man made barriers, surface soil characteristics in the vicinity affected by the explosions relative to their capacity to generate PM, and any work practices used to minimize or control PM), and any significant air pollutants from the explosive materials themselves. Significant levels of pollutants are deemed to be 5 tons per year of PM, 1000 pounds or more per year of HAPs, and 500 pounds per year of lead.

6. With regard to emissions source 1134-BLAST-2, we understand that the installed blast media unit, as installed, has two emission exhausts. Please confirm this and send relevant corrected application pages (i.e., Section III E, item 2-Emission Point Type Code). With regard to your request to treat this emissions unit as an exempt activity, it would be necessary to show that the potential to emit emissions (based on the maximum design media throughput for 8760 hours per year) without the pollution control devices installed would be negligible. For purposes of your facility, we would deem negligible to be less than 5 tons per year of PM. Please provide these estimates if you still wish to have this emissions unit be exempt. Otherwise, we intend to require testing and recordkeeping in the permit to provide assurance that the emissions control equipment is functioning properly. Also, please provide the operating rate that was used during the recent opacity testing done in accordance with the requirements of the construction permit for this emissions unit.

We would appreciate a rapid response to the above issues. If you need additional assistance, please contact Owen Mancarella at (850) 595-8364, extension 1232.

Sincerely,

Ed K. Middleswart, P.E.
Air Program Administrator

EKM:omc
Enclosures