
STATEMENT OF BASIS

Title V Air Operation Permit Renewal Permit No. 0910031-017-AV

APPLICANT

The applicant for this project is United States Air Force. The applicant's responsible official and mailing address are: Ms. Vicki Preacher, Deputy Base Civil Engineer, United States Air Force, 501 DeLeon Street, Eglin Air Force Base, Florida 32542.

FACILITY DESCRIPTION

The applicant operates the Eglin Air Force Base, which is located seven miles northeast of Fort Walton Beach at 592 Range Road on Eglin AFB, Okaloosa County. The facility is a major stationary source of Carbon Monoxide (CO) and Nitrogen Oxides (NO_x) emissions for Prevention of Significant Deterioration (PSD) and is an area source of Hazardous Air Pollutants (HAP).

Eglin AFB occupies most of the southern half of Okaloosa County and portions of the southern halves of Santa Rosa and Walton Counties. This facility consists of 27 bombing ranges, three active airfields and ten auxiliary airfields within an area of approximately 726 square miles. The main base is located two miles southwest of the twin cities of Valparaiso and Niceville, and seven miles northeast of Fort Walton Beach. The base houses the Air Armament Center under the Air Force Material Command. The Center plans, directs and conducts tests and evaluations of U.S. and allied air armaments, navigation/guidance systems and Command and Control systems. A test wing, an air base wing and an air reserve wing use the air fields and test ranges. Air pollutant emitting activities associated with Eglin AFB result from facilities required for the testing, air operations and training activities such as fuel storage tanks; fuel burning equipment such as boilers, heaters, and emergency generators; and, maintenance requirements such as paint booths. Hurlburt Field is southwest of Eglin Main and is under the Air Force Special Operations Command. Hurlburt Field is not included in this permit.

Eglin AFB operates a perchloroethylene dry cleaning facility, aerospace paint booths (includes outside areas), non-aerospace paint booths, boilers fueled by natural gas, boilers fueled by diesel fuel, stationary Compression Ignition (CI) and Spark Ignition (SI) Reciprocating Internal Combustion Engines (RICE), a gasoline distribution terminal, gasoline storage tanks, and a relocatable air curtain incinerator.

The perchloroethylene dry cleaning operations involve the cleaning of fabrics with non-aqueous organic solvents (perchloroethylene). Operations consist of washing fabrics in solvents, spinning the fabrics to extract the excess solvent, and drying the fabrics by tumbling in a hot air stream and recovering excess solvent. The emissions unit is regulated by 40 CFR 63 Subpart M - National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities; MACT.

Aerospace paint booths are used to provide surface coating (corrosion protection) for aerospace equipment and parts. Since these activities are involved with the maintenance/repair of aerospace vehicles and parts, they are regulated by 40 CFR 63 Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities. However, these maintenance activities are only subject to the hand-wipe cleaning, flush cleaning, spray gun cleaning and waste storage and handling requirements under the NESHAP. One emission unit (EU I.D. 011, Bldg 72) is regulated by the performance testing or design evaluation and continuous monitoring using a portable gas analyzer regulated by 40 CFR 63.751. Particulate matter (PM) emissions are controlled by a three-stage filter system and VOC emissions are controlled by a non-regenerative carbon adsorption unit. The remaining aerospace paint booths are regulated by filter efficiency standards established in EPA Method 319. Method 319 filter certifications provided by the manufacturer are maintained at each paint booth.

Non-aerospace paint booths are used to provide surface coating (corrosion protection) for non-aerospace equipment and parts. The booths are equipped with dry particulate filters to control PM emissions from overspray. These emissions units are regulated by Rule 62-296.320(4)(b)1., F.A.C., General Pollutant Emission Limiting Standards (opacity of less than 20%).

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Boilers between 10 and 32 MMBtu/hr maximum heat input provide comfort heating at the Base Hospital (EU I.D. 006, Building 2825) and heating for R&D projects at the Climatic Laboratory (EU I.D. 007 and EU I.D. 033, Building 438). The amount of PM and SO₂ emissions from the boilers is limited by the firing of natural gas. These emissions units are regulated by Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with less than 250 MMBtu/hr Heat Input. EU I.D. 006 and EU I.D. 033 are also regulated by 40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

There are numerous small, unregulated boilers with a total design heat input greater than 250 MMBtu/hr, making the facility a major source for PSD. Any future facility modifications or relaxation of requirements that will increase actual emissions may be regulated by Rule 62-212.400, F.A.C.

Some stationary reciprocating internal combustion engines are regulated by 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. These diesel-fired engines are primarily used to power stationary emergency and non-emergency generators.

Some stationary compression ignition internal combustion engines are regulated by 40 CFR 60 Subpart IIII, Standards of Performance - Stationary Compression Ignition Internal Combustion Engines. The diesel-fired engines are primarily used to power stationary emergency and non-emergency generators.

Some stationary spark ignition internal combustion engines are regulated by 40 CFR 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. These are gasoline fueled lean burn non-emergency engines.

Eglin AFB operates a gasoline distribution terminal with a capacity of 24,900 gallons, regulated by 40 CFR 63 Subpart BBBB - National Emission Standards for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

Eglin AFB operates 13 gasoline storage tanks, ranging from 2,500 to 20,000 gallon capacities, regulated by 40 CFR 63 Subpart CCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities.

Eglin AFB operates a relocatable Air Curtain Incinerator (ACI) used to dispose of Celotex Versakor Industrial Fiberboard from munitions testing. This source is regulated by Rule 62-296.401(7), F.A.C., which includes emissions limits and operational requirements. The ACI is also regulated by the specific requirements of 40 CFR 60 Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction is Commenced after November 30, 1999 or for Which Modification or Reconstruction is Commenced on or after June 21, 2001.

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

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received on October 17, 2013.

Additional Information Request dated October 25, 2013

Additional Information Response received December 19, 2013

Notice of Intent to Issue Air Permit issued March 11, 2014

Public Notice Published April 10, 2014

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PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as an area 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 stationary 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

Revision permit 0910031-016-AV, effective July 16, 2013 incorporated an air curtain incinerator with a mobile compression ignition internal combustion engine, an aerospace paint booth, CI and SI RICE engines, diesel-fired boilers, updated changes in organizational commands and placeholder emissions units with limited use for two non-metallic mineral crushers and a concrete batch plant.

CONCLUSION

This project renews Title V air operation permit No. 0910031-013-AV, which was issued on June 1, 2009. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.