Permittee:

Department of the Navy
Naval Air Station, Jacksonville
P.O. Box 2
Jacksonville, FL 32212-1002

DRAFT Permit No.: 0310215-028-AC
Facility ID No.: 0310215
SIC No.: 97
Project: Blast Booth Modification

This is a permit for the Department of the Navy, Naval Air Station, Jacksonville, to modify blast booth (Emission Unit No. 015). The facility is located at 6500 Roosevelt Blvd., Jacksonville, Duval County, FL.; UTM Coordinates: Zone 17, 434.2 km East and 3343.2 km North; Latitude: 30° 13′ 14″ North and Longitude: 81° 41′ 02″ West.

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC), Rules 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Environmental Resource Management Department, Environmental Quality Division (Department), and made a part hereof, in accordance with the terms of this permit.

Title V Operation Permit Application Due Date: **December 1, 2008**
Expiration Date: **May 31, 2009**

Environmental Resource Management Department
Environmental Quality Division

_____

Robert Steven Pace, P.E., Manager
Air Quality Branch

RSP/JW

Section I. Facility Information

Subsection A. Facility/Project Description

The facility is a major source of air pollution because the potential emissions of regulated criteria air pollutants are equal to or greater than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP) are equal to or greater than 10 tons per year for a single HAP and equal to or greater than 25 tons per year for total HAPs in accordance with Rule 62-210, FAC, and JEPB Rule 2.301.

The facility is major for purposes of Prevention of Significant Deterioration. The modification of the blast booth will not require a Best Available Control Technology Determination because there is not a significant pollutant increase associated with the modification.

The Naval Air Station, Jacksonville, is a large base occupying about 3400 acres. Over 70 commands are housed at the station. Air pollutant emissions may be categorized as belonging to one of three major organizations which are described below:

1. Naval Air Station (NAS) provides training of aircraft crews and commands, supports fleet and shore based personnel, maintains and operates facilities and provides services and materials to support operation of the aviation activities. Air pollutant emitting activities associated with this organization primarily result from operation and maintenance of military aircraft which are currently organized into three wings. Each wing consists of several squadrons.

   PATWING-11---Patrol airplane squadrons (P3 aircraft), P3 training squadron, reserve squadron

   HSWINGSLANT---Helicopter squadrons

   VSWING---Squadrons of S3 jet aircraft

   These squadrons perform organizational level maintenance on the aircraft. Intermediate level of maintenance is performed at the Aircraft Intermediate Maintenance Department (AIMD)

2. The Public Works Center (PWC) maintains support facilities, such as the boiler plants and other utilities. Air pollution activities are primarily from combustion of fuels in boilers. PWC contracts facility maintenance operations with an outside contractor.

3. The NAVAIR Depot performs in-depth maintenance, repair, and rework of naval aircraft, engines, components, accessories, and ground support equipment. Air pollution activities at the NAVAIR Depot include surface coating of aircraft and aircraft components, de-painting operations, chrome electroplating operation, solvent cleaning operations, abrasive blasting operations, and engine testing. Other miscellaneous operations are also performed.

This construction permit is for the modification of blast booth (EU No. 015) located in Building 101. The modification allows the blasting of aerospace components in this booth and also allows the addition of corn starch, plastic and similar materials as abrasives in the booth. The blasting operation is subject to the requirements of 40 CFR 63, Subpart GG, National Emission Standards for Aerospace Manufacturing and Rework Facilities, and 40 CFR 63, Subpart A, General Provisions, as delineated in Table 1 of Subpart GG and Reasonably Available Control Technology (RACT) requirements including **Specific RACT Emission Limiting Standards for Stationary Emission Units** [Rule 62-296.700(3), FAC, and Rule 2.1001, JEPB]**;**

Maximum Allowable Emission Rates [Rule 62-296.700(4), FAC, and Rule 2.1001, JEPB]; **Circumvention** [Rule 62-296.700(5), FAC, and Rule 2.1001, JEPB], and **Operation and Maintenance Plan** [Rule 62-296.700(6), FAC, and Rule 2.1001, JEPB]. Particulate matter and inorganic HAP is controlled through the use of a cartridge baghouse in series with a HEPA filter to comply with the control technology requirements and emission limitations of these regulations.

Subsection B. Summary of Emission Unit (EU) ID Nos. and Brief Descriptions

Emission Unit ID No.	Brief Description	Control Device
015	Abrasive Blast Booth, Bldg. 101	Cartridge baghouse in series with a HEPA filter

Subsection C. Relevant documents

Title V Air Operation Permit 0310215-023-AV
Air construction/modification permit application received June 19, 2007

Section II. Facility Wide Conditions

Subsection A. General Conditions

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific process and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup
or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
   a. Have access to and copy any records that must be kept under conditions of the permit;
   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

   Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
   a. A description of and cause of noncompliance; and

   b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, FAC, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:
   ( ) Determination of Best Available Control Technology (BACT)
   ( ) Determination of Prevention of Significant Deterioration (PSD)
   ( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
   ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following:

    a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by this permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

    c. Records of monitoring information shall include:
        1. The date, exact place, and time of sampling or measurements;
        2. The person responsible for performing the sampling or measurements;
        3. The date(s) analyses were performed;
        4. The person responsible for performing the analyses;
        5. The analytical techniques or methods used;
        6. The results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.
    [Rule 62-4.160, FAC, and Rule 2.1301, Jacksonville Environmental Protection Board (JEPB)]

Subsection B. Specific Conditions

1. Any revision(s) to a permit (and application) shall be submitted to and approved by the Department prior to implementing
   [Rule 62-4.080(2), FAC, and Rule 2.1301, JEPB]

2. Control equipment shall be provided with a method of access that is safe and readily accessible.
   [Rule 62-297.310(6), FAC, and Rule 2.1101, JEPB]

3. Permittee shall submit an annual operation report to the Department for this (these) emission unit(s) on the
   form(s) supplied for each calendar year on or before March 1.
   [Rule 62-210.370(3), FAC, and Rule 2.301, JEPB]

4. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for a Title V Air Operation Permit revision with compliance records and test results, to the Department one hundred eighty (180) days prior to the expiration date of the construction permit or 90 days after completion of compliance testing, whichever occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid Title V Air Operation Permit Revision to operate.
   [Rule 62-210.300(2), FAC, and Rule 2.301, JEPB]

5. The construction/modification shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction/modification on schedule, the Department must be notified in writing sixty (60) days prior to the expiration of the construction permit. A new schedule and request for an extension of the construction permit must be submitted.
[Rule 62-4.080(3), FAC, and Rule 2.1301, JEPB]

6. 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 2.1001, JEPB]

7. The facility shall be subject to 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]

8. The facility shall be subject to JEPB Rule 2, Part Nos. I through VII, and Part Nos. IX through XIII.

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

Environmental Resource Management Department
Environmental Quality Division
117 West Duval Street, Suite 225
Jacksonville, FL 32202
Telephone: 904/630-4900
Fax: 904/630-3638

Section III. Emission Units and Conditions

Emission Unit No. 015 – Abrasive Blast Booth, Building 101

Emission Unit Description:	Abrasive blasting and cleaning of components (including aerospace components) is conducted using glass beads, corn starch, plastics, or similar materials as blast media.
Particulate matter control device:	Cartridge baghouse in series with HEPA filter

Emission Limitations and Standards

1. The maximum process rate of abrasive blast material to the blaster shall be 3400 pounds per hour (lbs/hr).
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

2. This EU shall be allowed to operate a maximum of 4160 hours per year.
[Applicant's Request, Rule 62-296.700(4), FAC, and Rule 2.1001, JEPB]

3. 40 CFR 63, Subpart GG, National Emission Standards for Aerospace Manufacturing and Rework Facilities, and 40 CFR 63, Subpart A, General Provisions, as delineated in Table 1 to Subpart GG and Reasonably Available Control Technology (RACT) requirements including **Specific RACT Emission Limiting Standards for Stationary Emission Units** [Rule 62-296.700(3), FAC, and Rule 2.1001, JEPB]**; Maximum Allowable Emission Rates** [Rule 62-296.700(4), FAC, and Rule 2.1001, JEPB]; **Circumvention** [Rule 62-296.700(5), FAC, and Rule 2.1001, JEPB], and **Operation and Maintenance Plan** [Rule 62-296.700(6), FAC, and Rule 2.1001, JEPB] shall apply to this emission unit.

4. PM emissions shall be limited to 0.03 gr/dscf [3.92 lbs/hr and 8.15 Tons Per Year (TPY)].
[Rule 62-296.712, FAC, and Rule 2.1001, JEPB]

5. Visible Emissions (VE) shall be limited to five (5) percent (%) opacity.
[Rule 62-296.712, FAC, and Rule 2.1001, JEPB]

6. The owner/operator shall operate the blasting booth, air handling and collection system, the baghouse, and the HEPA filter in accordance with manufacturer's specifications. During periods of malfunction of such equipment the owner/operator may use substitute materials during the repair period provided the substitute materials used are those available that minimize organic HAP emissions. In no event shall substitute materials be used for more than 15 days annually, unless such materials are organic HAP free.
[40 CFR 63.746(b)(2), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

7. The owner/operator shall only perform the depainting (blasting) operation in the enclosed blasting booth. The airstream from the blast booth shall be passed through a baghouse and HEPA filter prior to discharge to the atmosphere.
[40 CFR 63.746(b)(4)(ii)(B), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

8. The owner/operator shall conduct the handling and transfer, of all wastes produced from this operation, which may contain HAP materials, to and from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.
[40 CFR 63.748, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Test Methods and Procedures

9. Testing for demonstration of compliance shall be performed in accordance with EPA Reference Method 9 (as described in 40 CFR 60, Appendix A) for the visual determination of opacity.

10. Initial VE testing shall be conducted within 60 days after achieving the maximum production rate at which the EU will operate but no later than 180 days after initial startup of the EU. Initial VE compliance testing shall be conducted for a minimum period of 30 minutes. Note: For purposes of startup use the date of the first use of corn starch or plastic as an abrasive blast material.
[Rule 62-297.310(4)(a), FAC, and Rule 2.1101, JEPB]

11. Testing for demonstration of compliance shall be performed in accordance with EPA Reference Method 5 (as described in 40 CFR 60, Appendix A) for the determination of the PM concentration.

12. PM testing shall be conducted upon request of the Department.
[Rule 62-297.310(7)(b), FAC, and Rule 2.1101, JEPB]

Record-keeping and Reporting Requirements

13. The permittee shall maintain records as required by the attached Operation and Maintenance Plan (O&M). Records shall be maintained for a minimum period of five (5) years. Commencement of recordkeeping shall occur effective the date of the initial VE compliance test.
[Rule 62-296.700(6), FAC, Rule 62-213.440(1)(b)2.b., FAC, Rule 2.1301, JEPB, Rule 2.501, JEPB, and Rule 2.1001, JEPB]

14. The owner/operator shall maintain records of each type of aircraft depainted, a listing of the parts, subassemblies, and assemblies normally removed from the aircraft before depainting. Prototype, test models, or aircraft which exist in low numbers (i.e., less than 25 aircraft of any one type) are exempt from this requirement.
[40 CFR 63.752(e)(4), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

15. The owner/operator shall maintain records of the names and types of dry media blasting equipment used.
[40 CFR 63.752(e)(5)(i), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

16. The owner/operator shall maintain the following records during periods of malfunction of the dry media blasting system:
    - (A) Equipment or technique which malfunctioned
    - (B) Date that the malfunction occurred
    - (C) Description of the malfunction
    - (D) Methods used to depaint aerospace vehicles during the malfunction
    - (E) Dates that the alternative methods were begun and discontinued
    - (F) Date that the malfunction was corrected

    [40 CFR 63.752(e)(5)(ii), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

17. The owner/operator shall submit semi-annual reports (every 6 months) for the period(s) September 1 through February 28 or 29, and March 1 through August 31. The reports shall be due May 1 for the September through February reporting period and November 1 for the March through August reporting period. The reports shall contain the following information:
    - (a) Identification of any 24 hour period where organic HAP were emitted from the depainting of aerospace vehicles, other than from exempt operations listed in 40 CFR 63.746(a), (b)(3), and (b)(5).
    - (b) Any new non-chemical depainting technique in use since the notification of compliance status or any subsequent semiannual report was filed
    - (c) Periods of Malfunction:
        - (A) Equipment or technique which malfunctioned
        - (B) Date that the malfunction occurred
        - (C) Description of the malfunction
        - (D) Methods used to depaint aerospace vehicles during the malfunction
        - (E) Dates that the alternative methods were begun and discontinued
        - (F) Date that the malfunction was corrected
        - (G) All periods when the depainting operation was not shut down during a malfunction and/or when the depainting operation was not shutdown when measured operational parameters were below or above limits specified by the equipment manufacturer or locally prepared operational procedures
    - (d) A list of new and discontinued aircraft models depainted at the facility over the last 6 months and a list of the parts normally removed for depainting for each new aircraft model being depainted
    - (e) If the depainting operation has been in compliance for the reporting period a statement signed by the responsible official stating that the operation was in compliance with the applicable standards

    [Applicant's Request, 40 CFR 63.753(d)(1), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

18. The owner/operator shall submit annual reports (every 12 months) for the period September 1 through August 31. The reports shall be due November 1 each year. The reports shall contain the following information:
    (a) The average volume per aircraft of organic HAP containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in 40 CFR 63.746(b)(3)

    (b) The number of times the measured operational parameters were below or above limits specified by the equipment manufacturer or locally prepared operational procedures

    [40 CFR 63.753(d)(2), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

19. The owner/operator shall maintain records of the monthly operating hours of the blasting booth and shall maintain records of the monthly use (quantity and type) of abrasive blasting material. Semi-annual reports of this information shall be submitted to the Department with the semi-annual reports required above. [Rule 62-213.440(1)(b), FAC, and Rule 2.501, JEPB]

General Provisions Applicability to Subpart GG

20. Table 1 to Subpart GG of Part 63 defines the applicable parts of the General Provisions which apply to affected emission units in 40 CFR, Subpart GG.
    [40 CFR 63, Subpart GG, Table 1, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to S.120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

s:\air quality\permitv\TVCP\draft\0310215-028d-AC