Department of the Navy
Naval Air Station, Jacksonville

Facility ID No.: 0310215
Duval County

Air Construction Permit
FINAL Permit No.: 0310215-045-AC

Replacement of two Paint Booths and associated Dust Collection System Control Devices under Emission Unit No. 080
Creation of New Emission Unit No. 117

PERMITTING AND COMPLIANCE AUTHORITY

NEIGHBORHOODS DEPARTMENT
ENVIRONMENTAL QUALITY DIVISION
ED BALL BUILDING, 214 NORTH HOGAN STREET, SUITE 500
JACKSONVILLE, FL 32202
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EU No.	**EU Description**
117	Paint Spray Booths, Bldg. 794

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
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Appendix PT

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

FINAL Permit No.: 0310215-045-AV
Facility ID No.: 0310215
SIC No.: 97
Project: Air Construction Permit

This permit is for the purpose of replacing two paint booths and the associated dust collection system control devices currently under Emission Unit No. 080 in the Engine Finish Shop, Building 794, located in the Fleet Readiness Center Southeast (FRCSE). Naval Air Station, Jacksonville is an aircraft operations and rework facility. This facility is located at 6801 Roosevelt Blvd., Jacksonville, Duval County, FL 32212; UTM Coordinates: Zone 17, 434.2 km East and 3342.8 km North; Latitude: 30^0 13′ 33″ North and Longitude: 81^0 42′ 0″ West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (FS) and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, Florida Administrative Code (FAC). 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 Neighborhoods Department, Environmental Quality Division (Permitting Authority) in accordance with the terms and conditions of this permit.

***Title V Air Operation Permit Application Due Date:** **March 1, 2015**
Expiration Date: **May 31, 2015**

Neighborhoods Department
Environmental Quality Division

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

RSP/HDS

***Note: See Section II. Facility Wide Conditions, Subsection B. Specific Condition 7**

Section I. Facility Information

Subsection A. Facility/Project Description

This permit is for the purpose of replacing two paint booths and the associated dust collection system control devices under Emission Unit No. 080 in the Engine Finish Shop, Building 794, located in the Fleet Readiness Center Southeast (FRCSE). Paint booths PT-9, PT-10, PT-11, PT-18 and PT-19 are currently under Emission Unit No. 080. The two new paint booths will be Climate Controlled Application Booths (CCAB) CCAB-1 and CCAB-2. These two paint booths will replace paint booths PT-18 and PT-19. Emission Unit No. 080 will be inactivated. The two new paint booths will be grouped with the three remaining paint booths under newly created Emission Unit No. 117.

Note: EU No. 080 was formerly EU Nos. 047, 048, 049, 050, and 051.

The Naval Air Station (NAS), Jacksonville Complex, is located in Duval County, in the northeastern sector of Florida. This naval base occupies about 3400 acres along the west bank of the St. Johns River. The base is approximately 30 miles inland from the Atlantic Ocean and 13 miles south of downtown Jacksonville. The main gate to the base can be accessed at about 3 miles north of the intersection of U.S. Highway 17 (US 17) and Interstate 295 (I-295) on US 17 (also known as Roosevelt Boulevard). Although the NAS complex consists of over 115 individual commands, for the purpose of this permit air pollutant emissions may be categorized as belonging to one of three major organizations as follows:

Air pollutant emissions may be categorized as belonging to one of three major organizations, which are described below:

1. 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 NAS primarily result from operation and maintenance of military aircraft.

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

3. The Fleet Readiness Center Southeast (FRCSE) is a merger of the former Naval Air Depot, an organization that has been in operation since 1940 performing in-depth (Level 3) maintenance, repair and rework of naval aircraft, and the former Aircraft Intermediate Maintenance Division, which performed intermediate (Level 2) maintenance and repair of naval aircraft and ground support equipment, into one organization. With over 4,000 employees it occupies more than 50 buildings in over 102 acres at the east end of NAS and along the primary runway. FRCSE personnel perform in-depth and intermediate level maintenance, repair, and rework of naval aircraft, engines, components, accessories, and ground support equipment. Most of the air pollutant emitting activities at the NAS Jacksonville complex are located within FRCSE, and consist of activities such as aircraft surface coating and depainting operations, solvent use operations, a chrome electroplating facility, abrasive blasting operations, engine testing, intermediate maintenance of military aircraft, corrosion control, and aircraft engine repair.

Intermediate level maintenance performed by FRCSE consists of several divisions that perform various maintenance activities:

a. The 400 Division performs maintenance on aircraft engines.
b. The 500 Division is responsible for airframes maintenance.
c. The 600 Division performs maintenance on aircraft electronic equipment.
d. The 700 Division performs maintenance on aircraft weapons and ordnance systems.
e. The 800 Division maintains life support equipment on the aircraft.
f. The 900 Division performs maintenance on aircraft ground support equipment.

The facility is a major source of air pollution for Title V purposes because the potential emissions of at least one regulated criteria air pollutant is greater than 100 tons per year pursuant to Chapter 62-210, FAC, and Rule 2.301, Jacksonville Environmental Protection Board (JEPB).

Based on the Air Construction Permit application received January 22, 2013, this facility is a major source of hazardous air pollutants (HAPs).

The facility is major for purposes of Prevention of Significant Deterioration of Air Quality because the potential emissions of PSD air pollutants are greater than 250 tons per year pursuant to Rule 62-210.200(194), FAC, and Rule 2.301, JEPB. The modification of Emission Unit No 080 will not result in a significant net increase of Volatile Organic Compounds (VOCs) or Particulate Matter (PM) Particulate Matter, nor will recent permitted modifications in addition to this modification result in a significant net increase of VOCs or PM, therefore, additional Prevention of Significant Deterioration analysis is not required. This modification of Emission Unit No. 080 will replace old equipment and upgrade to the newest technologies in industrial ventilation to improve personnel working conditions and create comfort.

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

EU No.	EU Description
117	Five Spray Booths, Bldg. 794

Subsection C. Relevant Documents

Title V Air Operation Permit No. 0310215-042-AV
Air Construction Permit Application received March 1, 2013

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 Permitting Authority 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 processes 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 Permitting Authority.

3. 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 Permitting Authority 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 Permitting Authority rules, unless specifically authorized by an order from the Permitting Authority.

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 Permitting Authority 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 Permitting Authority rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Permitting Authority 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 Permitting Authority 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 Permitting Authority 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 Permitting Authority 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 Permitting Authority may be used by the Permitting Authority as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Permitting Authority 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 Permitting Authority 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 Permitting Authority rules.

11. This permit is transferable only upon Permitting Authority 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 Permitting Authority.

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)
    ( ) Compliance with New Source Performance Standards
    (X) Compliance with National Emissions Standards for Hazardous Air Pollutants

14. The permittee shall comply with the following:

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

    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 Permitting Authority 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 Permitting Authority, 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 Permitting Authority, such facts or information shall be corrected promptly.
    [Rule 62-4.160, FAC, and Rule 2.1401, 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 Permitting Authority prior to implementing.
   [Rule 62-4.080(2), FAC, and Rule 2.1401, JEPB]

2. Permittee shall submit an Annual Operation Report to the Permitting Authority for this (these) emission unit(s) on the form(s) supplied for each calendar year on or before April 1 of the following year.
   [Rule 62-210.370(3), FAC, and Rule 2.301, JEPB]

3. The construction/modification shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Permitting Authority 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(2), FAC, and Rule 2.1401, JEPB]

4. Permittee shall notify the Permitting Authority fifteen (15) days prior to EU testing.
[Rule 62-297.310(7)(a)(9), FAC, and Rule 2.1201, JEPB.]

5. Copies of the test report(s) shall be filed with the Permitting Authority within forty-five (45) days of completion of testing.
[Rule 62-297.310(8)(b), FAC, and Rule 2.1201, JEPB]

6. Stack sampling facilities shall comply with the requirements of Rule 62-297.310(6), FAC, and Rule 2.1201, JEPB.

7. 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 Operating Permit with compliance records and test results, to the Permitting Authority, at least 90 days prior to the expiration date of the construction permit. An applicant making timely and complete application for an operation permit shall continue to operate the source under the authority and provisions of any existing valid permit until the conclusion of proceedings associated with its permit application or until the new permit becomes effective, whichever is later, provided the applicant complies with all the provisions of subparagraphs 62-213.420(1)(b)3., F.A.C.
[Rule 62-213.420(1)(a)1. and (b)2., FAC and Rule 2.501, JEPB]

8. <u>General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited</u>. 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 2.1101, JEPB]

9. <u>General Particulate Emission Limiting Standards. General Visible Emissions Standard</u>.
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 Reference Method 9, shall be the compliance method. Testing shall be required, upon request from the Permitting Authority.
[Rule 62-296.320(4)(b)1., FAC, Chapter 62-297, FAC, Rule 2.1101, JEPB, and Rule 2.1201, JEPB]

10. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter emissions from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following:

    a. Paving and maintenance of roads, parking areas and yards.
    b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
    c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
    d. Removal of particulate matter from roads and other paved areas under the control of the permittee of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.

e. Landscaping or planting of vegetation.
f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
g. Confining abrasive blasting where possible.
h. Enclosure or covering of conveyor systems.
[Rule 62-296.320(4)(c)1 & 3, FAC, and Rule 2.1101, JEPB]

11. 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].

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

13. Excess emissions resulting from startup, shutdown, or malfunction of any emission 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 Permitting Authority for longer duration. 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 the case of excess emissions resulting from malfunctions, each permittee shall notify the Permitting Authority in accordance with Rule 62-4.130, FAC and Rule 2.1401, JEPB. A full written report on the malfunctions shall be submitted to the Permitting Authority in a quarterly report, if requested by the Permitting Authority.
[Rule 62-210.700, FAC, and Rule 2.301, JEPB]

14. Testing of emissions shall be conducted with the EU operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then EU may be tested at less than capacity; in this case subsequent EU operation is limited to 110 percent of the test load until a new test is conducted. Once the EU is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
[Rule 62-297.310(2), FAC, and Rule 2.1201, JEPB]

15. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Permitting Authority. Such permit shall be obtained prior to beginning construction or modification.
[Rule 62-210.300(1), FAC, Rule 62-212.300(1)(a), FAC, Rule 2.301, JEPB, and Rule 2.401, JEPB]

16. Source Obligation:

a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), FAC, shall apply to the source or modification as though construction had not yet commenced on the source or modification.

b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), FAC., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), FAC and Rule 2.401, JEPB]

17. Emissions Computation and Reporting: The facility shall follow the methodologies set forth in Rule 62-210.370(2) & (3), F.A.C. which sets forth required methodologies to be used by the permittee of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. The rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit.
[Rule 62-210.370(1), (2) & (3), FAC and Rule 2.301, JEPB]

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

Neighborhoods Department
Environmental Quality Division
Ed Ball Building
214 North Hogan Street, Suite 500
Jacksonville, FL 32202
Telephone: (904) 255-7100
Fax: (904) 588-0518

19. Any reports, data, notification, certifications, and requests required to be sent to the United States Environmental Protection Agency, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
61 Forsyth Street
Atlanta, GA 30303
Telephone: 404/562-9155
Fax: 404/562-9163

Section III. Emission Unit(s) and Conditions

Surface Coating/Solvent Use/Paint Stripping Operations

Emission Unit No. 117 - Five Paint Spray Booths, Bldg. 794

Emission Unit Description:	Coatings are applied to aircraft engines and engine components.
PM Control Device:	Existing paint booths PT-9, PT-10 and PT-11 are each equipped with a two stage dry particulate filter system. New paint booths CCAB-1 and CCAB-2 are each equipped with three stage dry particulate filter system and a HEPA filter.

Essential Potential to Emit (PTE) Parameters

1. This EU shall be allowed to operate continuously, i.e.: 8,760 hours per year.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

2. The estimated maximum airflow rate for each paint booth, PT-9, PT-10 and PT-11 is 11,700 dry standard cubic feet per minute (dscfm) and the estimated maximum airflow rate for each paint booth, CCAB-1 and CCAB-2 is 12,000 dscfm for a total combined estimated maximum airflow rate for the five paint booths of 59,100 dscfm.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. 40 CFR 63, Subpart GG, National Emission Standards for Aerospace Manufacturing and Rework Facilities, and 40 CFR 63, Subpart A, General Provisions, shall apply to this emission unit.

4. The maximum process rate of tons of solvent in coating at this EU shall be limited to 5.48 tons per yr. [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB, and Permit AC16-240666]

Primer/Topcoat Application Operations

5. See Appendix PT

Cleaning Operations

6. See Appendix CO