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Naval Air Station (NAS) Pensacola
NG Boilers, Buildings 3581 and 604
Facility ID No.: 0330082
Escambia County

Air Construction Permit
Permit No.: 0330082-004-AC

Permitting and Compliance Authority:
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32501-5794
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[electronic file name: 0330082c.doc]

Air Construction Permit
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Jeb Bush
Governor

Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

Permittee:
Naval Air Station (NAS) Pensacola

Permit No.: 0330082-004-AC
Facility ID No.: 0330082
SIC Nos.: 9711
Project: Air Construction Permit

This permit is for the construction of two natural gas fired boilers in Buildings 3581 and 604 with heat inputs of 2.1 MMBtu/hr and 4.2 MMBtu/hr, respectively, located at NAS Pensacola, Escambia County; UTM Coordinates: Zone 16, 472.8 km East and 3364.8 km North; Latitude: 30° 25' North and Longitude: 87° 17' West.

STATEMENT OF BASIS: This air construction permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. 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 permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix G-1, General Conditions

Effective Date: September 27, 1999
Expiration Date: September 27, 1999

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

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

EKM/bkc

Section I. Facility Information.

Subsection A. Facility Description.

NAS Pensacola Complex is a Naval Training Facility which provides training of aircraft crews and commands, supports fleet and shore-based personnel, maintains and operates the base facilities, and provides services and materials to support operation of the base aviation activities. Air pollutant emitting activities associated with NAS result from facilities required for the training activities such as fuel storage tanks, and firefighting facilities; fuel burning equipment such as boilers, heaters, and emergency generators; and maintenance requirements such as aircraft engine test stands.

This permit is issued after-the-fact for the construction of two natural gas fired boilers. The first is a 4.2 MMBtu/hr heat input steam boiler located at Building 604. The second is a 2.1 MMBtu/hr heat input steam boiler replacing an existing dual fuel (NG/FO) boiler in Building 3581.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U.

ID No. Brief Description

O39	Construction of two additional natural gas fired boilers with heat inputs of 4.2 and 2.1 MMBtu/hr
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Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:

Permit Application received August 11, 1999

Letter providing additional information dated August 26, 1999

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.
2. 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), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. 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 Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310, F.A.C.]
5. An annual operating report for air pollutant emitting facility, DEP Form 62-210.900(5), shall be submitted by March 1 of each year. A copy of the form and instructions may be obtained from the Department's Northwest District office.
[Rule 62-210.370, F.A.C.]
6. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]
7. The permittee shall submit all compliance related notifications and reports required by this permit to the Department's Northwest District office.

8. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, extension 1220, day or night, and for emergencies involving a significant threat to human health or the environment is (800) 320-0519. For routine business, telephone (850) 595-8364, then press 7, during normal working hours.

[Rules 62-210.700 and 62-4.130, F.A.C.]

9. The Department shall be notified upon commencement of construction. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction. Projects beyond one year require annual status reports.

[Rule 62-4.030, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U.

ID No. Brief Description

O39 Construction of two additional natural gas fired boilers with heat inputs of 4.2 and 2.1 MMBtu/hr

This permit is an after-the-fact permit for the construction of two natural gas fired boilers. The first is a 4.2 MMBtu/hr heat input steam boiler (Hurst model S2-G-100-150) located at Building 604. The second is a 2.1 MMBtu/hr heat input steam boiler (Hurst model S2-G-50-30W) replacing an existing dual fuel (NG/FO) boiler in building 3581. These boilers are subject to Rule 62-296.406, F.A.C. (Fossil Fuel Steam Generators less than 250 MMBtu/hr heat input). The BACT requirements contained in Rule 62-296.406, F.A.C. are satisfied by the use of natural gas. These boilers are not subject to 40 CFR 60 Subpart Dc, since they are less than the applicable threshold of 10 MMBtu/hr heat input. Visible emissions are limited to 20% opacity or less to be consistent with the limitations included in NAS Pensacola's Title V permit (0330082-003-AV).

The following specific conditions apply to the emissions unit(s) listed above:

A.1. Capacity. The maximum allowable operating rate is 4.2 MMBtu/hr heat input for the boiler located in Building 604, and 2.1 MMBtu/hr heat input for the boiler located in Building 3581. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; construction permit application received August 11, 1999]

A.2. Methods of Operation - (i.e., fuel). These boilers shall be operated using only natural gas. [Rules 62-4.160(2) and 62-213.440(1), F.A.C.; construction permit application received August 11, 1999]

A.3. Hours of Operation. These boilers are allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.4. Visible emissions shall not equal or exceed 20% opacity.
[Rule 62-296.320, F.A.C.]

Test Methods and Procedures

A.6. Visible emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted for thirty minutes in accordance with EPA method 9. Such tests shall be scheduled within 30 days after initial operation. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

A.7. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports.

[Rule 62-297.310, F.A.C.]

A.8. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

[Rules 62-297.310(2) and 62-4.070, F.A.C.]

Recordkeeping and Reporting Requirements

A.9. The permittee shall maintain continuous records of fuel consumption or approximate fuel consumption based on hours of operation, and each analysis that provides the heating value and fuel sulfur content.

[Rule 62-4.070(3), F.A.C.]

Excess Emissions

A.10. Excess emissions resulting from startup, shutdown or malfunction of any emissions 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 Department for longer durations.

Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

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 case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700, F.A.C.]

Other Applicable Requirements:

A.11. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

[Rule 62-297.310(7), F.A.C.]

A.12. A Major Air Pollution Source Annual Operation Fee Form [DEP Form 62-213.900(11)] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. A copy of the form and instructions may be obtained from the Department's Northwest District office. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with Section 220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operations license fee, penalty or interest.

[Rule 62-213, F.A.C.]

Application for Operation Permit:

A.13. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of this project. Upon completion, the engineer shall inspect for conformity to the permit application and associated documents. An application for inclusion in the facility Title V operating permit (0330082-003-AV) shall be submitted with the compliance test results and appropriate fee when applicable. These are to be submitted within 75 days of initial operation. The permittee shall obtain authorization to operate these sources before the expiration of the construction permit if the permittee desires to continue operation.

[Rule 62-210.300, F.A.C.]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit 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 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 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. Nor 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 does not constitute 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 the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment 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, are 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of this permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,
 - c. Sampling or monitoring 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

GENERAL CONDITIONS:

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- b. The period of noncompliance, including exact 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 for 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 proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with 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 Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. 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 the 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:
 - the date, exact places, and time of sampling or measurement;
 - the person responsible for performing the sampling or measurement;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
14. 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 the 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.