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SENDER: Complete items 1 and 2 when additional 3 and 4. Put your address in the "RETURN TO" Space on the everse from being returned to you. The return receipt fee will provide the date of delivery. For additional fees the following services and check box(es) for additional service(s) requested. 1. Show to whom delivered, date, and addressee's ad (Extra charge)	side. Failure to do this will prevent this card you the name of the person delivered to and s are available. Consult postmaster for fees
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Orlando, FI , 32813-5010	Always obtain signature of addressee or agent and DATE DELIVERED.
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RECEIPT FOR CERTIFIED MAIL NO INSURANCE COVERAGE PROVIDED NOT FOR INTERNATIONAL MAIL

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Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Captain N. C. Davis, USN
Department of Navy
U.S. Naval Training Center
Public Works Office, Bldg. 2025
Orlando, Florida 32813-5010

November 14, 1990

Enclosed is construction permit No. AC 48-181529 to construct a Fire Fighting/Chemical Warfare Countermeasures Training Facility in Orlando, Orange County, Florida This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

H. Fancy, P.E.

Bureau of Air Regulation

Copy furnished to:

Charles Collins, Central District Gary Wingfield, P.E. Dennis Nester, Orange County EPD

CERTIFICATE OF SERVICE

The	und	ersigr	ned d	uly	designa	ted	dep	uty c	lerk	hereby
certifies								-	were	mailed
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FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to $\S120.52(9)$, Florida Statutes, with the designated Department Clerk, of which is receipt hereby acknowledged.

Clerk

Final Determination

U.S. Naval Training Center Orlando, Florida Orange County

Fire Fighting/Chemical Warfare Countermeasures
Training Facility

Permit Number: AC 48-181529

Department of Environmental Regulation Division of Air Resources Management Bureau of Air Regulation

Final Determination

The Technical Evaluation and Preliminary Determination for the permit to construct a Fire Fighting/Chemical Warfare Countermeasures Training Facility at the U.S. Naval Training Center in Orlando, Orange County, Florida, was distributed on June 29, 1990. The Notice of Intent to Issue was published in the Orlando Sentinel on September 19, 1990. Copies of the evaluation were available for public inspection at the Department's offices in Orlando and Tallahasee and the Orange County Environmental Protection Department in Orlando.

No public comments were submitted on the Department's Intent to Issue the permit. In response to comments within the Department, Specific Conditions Nos. 3, 4, and 5 were modified to be consistent with the general visible emissions regulations. The final action of the Department will be to issue construction permit No. AC 48-181529 as proposed in the Technical Evaluation and Preliminary Determination except for the changes discussed.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400 Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

U.S. Naval Training Center Public Works Office, Bldg. 2025 Orlando, Florida 32813-5010

Permit Number: AC 48-181529 Expiration Date: August 1, 1992

County: Orange

Latitude/Longitude: 28°34'05"N

81°20'14"W

Project: Fire Fighting/Chemical Warfare Countermeasures Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. 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 Department and made a part hereof and specifically described as follows:

construction of fire fighting/chemical the a countermeasures training facility to include trash, bilge, electrical panel fire simulator structures, propane/triarylphosphate smoke simulator equipment, water, sodium bicarbonate (PKP), Ultrawet K (AFFF), and carbon dioxide fire extinguisher systems, and a gas chamber. Fans will be used to ventilate the fire simulator and gas chamber structures. The UTM coordinates of the site are Zone 17, 467.8 km East and 3160.0 km North.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application

Page 1 of 6



PERMITTEE:
U.S. Naval Training Center

Permit Number: AC 48-181529 Expiration Date: August 1, 1992

GENERAL CONDITIONS:

- 1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 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. 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 the 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.

PERMITTEE: Permit Number: AC 48-181529
U.S. Naval Training Center Expiration Date: August 1, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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 a reasonable time, 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 the 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 non-compliance; and
 - b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:
U.S. Naval Training Center

Permit Number: AC 48-181529 Expiration Date: August 1, 1992

GENERAL CONDITIONS:

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 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 Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance 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. 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

PERMITTEE: Permit Number: AC 48-181529

U.S. Naval Training Center Expiration Date: August 1, 1992

GENERAL CONDITIONS:

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 place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates 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 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.

SPECIFIC CONDITIONS:

- 1. The fire fighting/chemical warfare countermeasures training facility operation is limited to daylight hours only, unless prior approval is obtained from the Department's Central District.
- 2. The 8 and 24-hour concentration of any chemicals used to simulate smoke, at ground level outside the fire fighting training facility, shall not exceed two percent (2%) of the threshold limit values published by the American Conference of Governmental Industrial Hygienists. Tests will be by methods acceptable to the Department when there are reasons to believe this specific condition is being violated.
- 3. Visible emissions from the facility as determined by EPA Method 9, which is described in 40 CFR 60, Appendix A (July 1, 1988 version), shall not exceed 20 percent opacity, six (6) minute average. These readings shall be used to determine the compliance status of the source.

PERMITTEE:
U.S. Naval Training Center

Permit Number: AC 48-181529 Expiration Date: August 1, 1992

SPECIFIC CONDITIONS:

- 4. Operation of the facility shall cease anytime the visible emissions on a road open to traffic exceeds 20% opacity.
- 5. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
- 6. Upon obtaining a permit to operate, the permittee will be required to submit annual operation reports which shall include, as a minimum, the type and amount of chemicals used at the facility during the preceding calendar year.
- 7. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
- 8. An application for an operation permit must be submitted to the Department's Central District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

STEVE SMALLWOOD, P.E.

Director

Division of Air Resources Management



State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee								
To:	Location:							
Ta:	_ Location:							
To:	_ Location;							
From:	_ Oate:							

Interoffice Memorandum

TO: Steve Smallwood

Clair Fancy (MM) FROM:

DATE: November 9, 1990

SUBJ: Approval of Construction Permit No. AC 48-181529

Department of Navy

U.S. Naval Training Center

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to construct a Fire Fighting/Chemical Warfare Countermeasures Training Facility in Orlando, Orange County, Florida.

No public comments were received during the notice period.

Day 90, after which this permit will be issued by default, is January 2, 1991.

I recommend your approval and signature.

CF/WH/plm

Attachments

Stus Changes

DEPARTMENT OF THE NAVY

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND 2155 EAGLE DR., P. O. BOX 10068 CHARLESTON, S. C. 29411-0068

PLEASE ADDRESS REPLY TO THE COMMANDING OFFICER, NOT TO THE SIGNER OF THIS LETTER,

5090/P3 Code 18132

1 7 OCT 1990

RECE/122 1990

Mr. C. H. Fancy Chief, Bureau of Air Regulation Florida Department of Environmental Regulation Twin Towers Office Bldg. 2600 Blair Stone Road Tallahassee, FL 32399-2400

Subj: FIREFIGHTING TRAINING FACILITY, NAVAL TRAINING CENTER, ORLANDO

Dear Mr. Fancy:

The Proof of Publication for the subject project is forwarded for your information and use. Please issue the necessary permit at your earliest convenience.

Should you have any questions, please contact Mr. Chandra Sheth, Code 18132, at (803) 743-0553.

Sincerely,

HEAD, ENVIRONMENTAL ENGINEERING

BRANCH

Encl:

(1) Proof of Publication, Notice of Intent to Issue Permit

Copy to:

NTC Orlando (Bill Raspet, PW) (w/encl)

Ce: W. Hands C. Collins

The Orlando Sentinel

Published Daily Orlando, Orange County, Florida

ADVERTISING CHARGE.

41

\$183.35

State of Florida (

Before the undersigned authority personally appeared	
Noemi R. Lucero , who on oath	says that
she is the Legal Advertising Representative of the Orlando Sentinel, a Daily r	ne w spaper
published at Orlando, in Orange County, Florida; that the attached copy vertisement, being a Notice of Intent to Issue in the	•
Department of Navy, U.S. Naval Training Center	er'
in the	Court,
was published in said newspaper in the issues of	

Affiant further says that the said Orlando Sentinel is a newspaper published at Orlando, in said Orange County, Florida, and that the said newspaper has heretofore been continuously published in said Orange County, Florida, each Week Day and has been entered as secondclass mail matter at the post office in Orlando, in said Orange County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

20th Sworn to and subscribed before me this. September Notary Public State of Florida at Large My Commission Expires: Notary Public

June 18, 1994

FORM NO. AD-262

State of Fiorida

Department of Environmental

Regulation

Notice of Intent to Issue

The Department of Environmental Regulation
mental Regulation hereby gives notice of its intent to issue a permit to the Department of Navy, U.S. Naval Training Center, Public Works Office, Bldg, 2025, Orlando, Florida 32813-5010, for the construction of a fire lighting/Chemical Warfare Countermeasure training facility at the U.S. Naval Training Center on Corrine Drive in Orlando, Orange County, Florida. The new facility will entity will replace the existing practice used for this training at this center. The facility will entit 2 TPY particulate matter, trace amounts of the products of combustion, and 0.023 TPY tear gas. A determination of Best Available Control Technology (BACT) was not required. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceedings (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2800 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitione vibratures that mail a copy of the petition to the applicant at the address indicated above at the time of filing, Fallure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner's substantial interests are affected by the Department's action or propos

any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed

petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modivications of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantlel interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office-of-General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 20.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion flued pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during business.

bresting officer upon incoording the property of the public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Department of Environmental Regulation Bureau of Air Regulation 2600 Blair Stone Road Taltahassee, Florida 32399-2400 Department of Environmental Regulation

Department of Environmental Regulation Central District 3319 Maguire BNd., Suite 232 Orlando, Florida 32803-2767 Orange County Environmental Protection Department 2002 E. Michigan Avenue Orlando, Florida 32806 Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be cosidered in the Department's final determination.

SENDER: Complete items 1 and 2 when additional s 3 and 4. Put your address in the "RETURN TO" Space on the reverse card from being returned to you. The return receipt fee will prevent to and the date of delivery. For additional fees the following for fees and check box(es) for additional service(s) request 1. Show to whom delivered, date, and addressee's additional service(s) request the service of the ser	se side. Failure to do this will prevent this rovide you the name of the person delivered services are available. Consult postmaster ed.
3. Article Addressed to: CAPT. NC Davis USN Dept. of Navy U.S. Naval Training Gr. Public Works Office Bg. 2025 Orlando, Fl 328/3-5010	Article Number 256396134 Type of Service: Registered Insured Cortified COD Express Mail Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Address X 6. Signature — Agent X 7. Date of Delivery PS Form 3811. Mar. 1988 A U.S.G.P.O. 1988—212-	Addressee's Address (ONLY if requested and fee paid)

P 256 396 134

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED NOT FOR INTERNATIONAL MAIL

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Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 29, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Captain N. C. Davis, USN
Department of Navy
U.S. Naval Training Center
Public Works Office, Bldg. 2025
Orlando, Florida 32813-5010

Dear Captain Davis:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to construct a training facility at the Naval Station in Orlando, Orange County, Florida.

Before final action can be taken on your draft permit, you are required by Florida Administrative Code Rule 17-103.150 to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Orange County no later than thirty days after receipt of this letter. The Department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice may be grounds for denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/WH/plm

Attachments

C: Charles Collins, Central District Gary Wingfield, P.E. Dennis Nester, Orange County EPD

BEFORE THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of Application for Permit by:

Department of Navy U.S. Naval Training Center Public Works Office, Bldg. 2025 Orlando, Florida 32813-5010 DER File No. AC 48-181529

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, the Department of Navy, applied on February 26, 1990, to the Department of Environmental Regulation for a permit to construct a training facility at the Naval Station in Orlando, Orange County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad general circulation in the area newspaper of section of a purpose of this rule, "publication affected. For the newspaper of general circulation in the area affected" publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for administrative proceeding (hearing) in accordance with Section The petition contain Florida Statutes. must information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received

notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action:
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with

respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is Accordingly, to formulate agency action. Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the The petition must conform to the requirements specified above and be filed (received) within 14 days publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

Copies furnished to:

Charles Collins, Central District Gary Wingfield, P.E. Dennis Nester, Orange County EPD

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 6-29-90.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to \$120.52(9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk

Date

State of Florida Department of Environmental Regulation Notice of Intent to Issue

Department of Environmental Regulation hereby notice of its intent to issue a permit to the Department of Navy, Naval Training Center, Public Works Office, Bldg. 32813-5010, for the construction of a fire Orlando, Florida fighting/Chemical Warfare Countermeasure training facility at the U.S. Naval Training Center on Corrine Drive in Orlando, Orange County, Florida. The new facility will replace the existing practice used for this training at this center. The facility will emit 2 TPY particulate matter, trace amounts of the products of combustion, and 0.023 TPY tear gas. A determination of Best Available Control Technology (BACT) was not required. emissions will not cause a violation of any ambient air quality Prevention of Significant Deterioration standard or The Department is issuing this Intent to Issue for the increment. in the Technical Evaluation and Preliminary reasons stated Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for administrative proceeding (hearing) in accordance with Section 120.57, Florida The petition contain Statutes. must information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
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- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the The petition must conform to the requirements proceeding. specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation Bureau of Air Regulation 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Department of Environmental Regulation Central District 3319 Maguire Blvd., Suite 232 Orlando, Florida 32803-3767

Orange County Environmental Protection Department 2002 E. Michigan Avenue Orlando, Florida 32806

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation and Preliminary Determination

U.S. Naval Training Center Orlando, Florida Orange County

Fire Fighting/Chemical Warfare Countermeasures
Training Facility

Permit Number: AC 48-181529

Department of Environmental Regulation Division of Air Resources Management Bureau of Air Regulation

I. General Information

A. Applicant

Department of Navy
U. S. Naval Training Center
Public Works Office, Building 2025
Orlando, Florida 32813-5010

B. Project and Location

The Department of Navy applied for a permit to construct a fire fighting/chemical warfare countermeasures training facility (SIC 9224) at the U.S. Naval Training Center on Corrine Drive in Orlando, Orange County, Florida on May 30, 1990. The new facility will replace the existing structures used for this training at the Center. The application was considered complete on May 30, 1990, when the permit application fee was submitted. The UTM coordinates of the Center are Zone 17, 467.8 km East and 3160.0 km North.

The proposed two story training facility will have: two 865,000 Btu/hr propane fired boilers (one boiler generally on stand-by) to provide heating for the facility; six propane fired fireplaces in which triphenylphosphate is added to the flames to simulate trash, bilge, and electrical panel fires; a smoke (propylene glycol) filled heated emergency egress chamber; and a chemical (tear gas) gas chamber. The simulated fires will be extinguished with water, "Utrawet K," sodium bicarbonate, and carbon dioxide. Fans will exhaust the fumes from the structure. Training classes will be held 8 hrs/day, 5 days/wk, and 50 wks/yr.

Training in the proposed structure will replace the existing practices which use a 280 gallon waste oil tank, a 10,000 gallon fuel oil tank, oil fired burners, and the existing chemical warfare countermeasures training room in another building.

C. Emissions

The primary emissions from the training facility will be the products of combustion of 3,892 CFH of propane (8.865 MMBtu/hr) and the chemicals used in the training programs. The following table summarizes the emissions from the proposed source.

Pollutant*	PM		SO ₂		NOx		CO .		VOC		Tear Gas	
	1b/hr	TPY	1b/hr	TPY	1b/hr	TPY	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
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Sources	[!		ļ		ļ		[ļ	
		,	! _	_			!				!	
Fireplaces	2.0	2.0	0	0	1.1	1.1	0.27	0.27	0.046	0.046		
Boiler No. 1	0.0042	0.0044] 0	0	0.12	0.12	0.030	0.031	0.0050	0.0051		
Boiler No. 2	0.0042	0.0044	0	0	0.12	0.12	0.030	0.031	0.0050	0.0051		
Gas Chamber			1				l				0.043	0.02
TOTAL	2.0084	2.0084	i 0	0	1.34	1.34	0.330	0.332	0.0560	0.056	0.043	0.02

*Visible emissions from sources are comprised of artificial smoke (a white colored hot air/aerosol mixture) and water vapor. Both evaporate to a colorless gas with no particulate matter resulting from the artificial smoke.

The fumes from the training facility are exhausted to the atmosphere by 17 fans. Flow varies from 80 to 15,000 ACFM.

Most of the sodium bicarbonate, Utrawet K extinguisher, and other liquid waste generated at this facility will be collected on site and pumped to the existing base wastewater collection system.

II. Rule Applicability

The proposed project, construction of a fire fighting/chemical warfare countermeasures training facility, is subject to preconstruction review under the provisions of F.A.C. Chapter 403, FS, and Chapters 17-2, 17-4, and 17-5.

The proposed source will be located in an area designated maintenance for ozone (F.A.C. Rule 17-2.460) and attainment for the other criteria pollutants (F.A.C. Rule 17-2.420).

As the proposed facility will only emit traces of any criteria pollutant, it is exempt from review under prevention of significant deterioration (PSD) regulations (17-2.500). It will be permitted under Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements. Emissions standards shall be based on Rule 17-2.620, General Pollutant Emission Standards, and Chapter 17-5, F.A.C., Open Burning and Frost Protection Fires.

III. Technical Evaluation

Presently, the Navy conducts instruction and training of organized fire fighters by setting and extinguishing fossil fuel fires. The emissions from these operations are the products of combustion of the fossil fuels mixed with the agents used to extinguish the fires.

To more realistically simulate fires on ships, the Navy proposes to construct a training facility that can simulate trash, bilge, and electrical panel fires. These fires will be simulated by adding triarylphosphate at a rate of 55 lbs/hr to propane fires (3,200 CFH). The fire will be extinguished with sodium bicarbonate (200 lbs/hr use rate), Ultrawet K foam extinguisher (490 lbs/hr use rate), or CO₂ (100 lbs/hr use rate). Wastewater generated will be sent to an existing base collection system.

Visible emissions in the immediate vicinity of the fires are exempt from Department regulations under F.A.C. Rule 17-5.090(5). After the moisture dissipates, the emissions will be required to comply with F.A.C. Rule 17-2.610, General Particulate Emission Limiting Standards, which limits visible emissions to 20 percent opacity. The Navy has estimated that, at a similiar facility, the plume travels 25 to 50 feet before the moisture is dissipated.

Chemical warfare countermeasures training involves evaporating 0.043 lbs/hr of tear gas, exposing the Navy personnel to the gas with and without gas masks, then exhausting the gas from the room. This training, which is currently being done elsewhere on the base, will be conducted in the new facility in the future.

IV. Air Quality Analysis

It is the judgement of the Department that the estimated emissions from the training facility will not cause a violation of any ambient air quality standard.

V. Conclusion

Based on the information provided by the Department of Navy, the Department has reasonable assurance that the proposed construction/operation of the fire fighting/chemical warfare countermeasures training facility, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.





Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

U.S. Naval Training Center Public Works Office, Bldg. 2025 Orlando, Florida 32813-5010 Permit Number: AC 48-181529

Expiration Date: August 1, 1992

County: Orange

Latitude/Longitude: 28°34'05"N

81°20'14"W

Project: Fire Fighting/Chemical Warefare Countermeasures Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. 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 Department and made a part hereof and specifically described as follows:

For the construction of a fire fighting/chemical warfare countermeasures training facility to include trash, bilge, and electrical panel fire simulator structures, propane/triaryl-phosphate smoke simulator equipment, water, sodium bicarbonate (PKP), Ultrawet K (AFFF), and carbon dioxide fire extinguisher systems, and a gas chamber. Fans will be used to ventilate the fire simulator and gas chamber structures. The UTM coordinates of the site are Zone 17, 467.8 km East and 3160.0 km North.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application

PERMITTEE:
U.S. Naval Training Center

Permit Number: AC 48-181529 Expiration Date: August 1, 1992

GENERAL CONDITIONS:

- 1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 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. 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 the 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.

PERMITTEE: Permit Number: AC 48-181529
U.S. Naval Training Center Expiration Date: August 1, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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 a reasonable time, 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 the 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 non-compliance; and
 - b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE: U.S. Naval Training Center

Permit Number: AC 48-181529 Expiration Date: August 1, 1992

GENERAL CONDITIONS:

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 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 Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance 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. 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

PERMITTEE:
U.S. Naval Training Center

Permit Number: AC 48-181529
Expiration Date: August 1, 1992

GENERAL CONDITIONS:

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 place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates 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 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.

SPECIFIC CONDITIONS:

- 1. The fire fighting/chemical warefare countermeasures training facility operation is limited to daylight hours only, unless prior approval is obtained from the Department's Central District.
- 2. The 8 and 24-hour concentration of any chemicals used to simulate smoke, at ground level outside the fire fighting training facility, shall not exceed two percent (2%) of the threshold limit values published by the American Conference of Governmental Industrial Hygienists. Tests will be by methods acceptable to the Department when there are reasons to believe this specific condition is being violated.
- 3. Visible emissions from the facility as determined by EPA Method 9, which is described in 40 CFR 60, Appendix A (July 1, 1988 version), shall not exceed 20 percent opacity, six (6) minute average, after the moisture in the exhaust gases has dissipated. To assure the moisture has dissipated, the visible emission readings of the exhaust gases will be taken when the gas is 50 feet from the facility. These readings shall be used to determine the compliance status of the source.

PERMITTEE: U.S. Naval Training Center

Permit Number: AC 48-181529 Expiration Date: August 1, 1992

SPECIFIC CONDITIONS:

- 4. Operation of the facility shall cease anytime the exhaust gases obstruct visibility on roads to less than 500 feet.
- 5. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor or other conditions to such a degree as to cause a nuisance.
- 6. Upon obtaining a permit to operate, the permittee will be required to submit annual operation reports which shall include, as a minimum, the type and amount of chemicals used at the facility during the preceding calendar year.
- 7. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
- 8. An application for an operation permit must be submitted to the Department's Central District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued	this	 day
of		 1990

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

STEVE SMALLWOOD, P.E. Director Division of Air Resources Management



RECEIVE DEPARTMENT OF THE NAVY DER-MAIL ROOM

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

1: 29 PH 1: 2755 EAGLE DR., P. O. BOX 10068

PLEASE ADDRESS REPLY TO THE COMMANOING OFFICER, NOT TO THE SIGNER OF THIS LETTER.

5090 11416/P1

2 3 MAY 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Clair Fancy Bureau of Air Quality Management Central Air Permitting Florida Department of Environmental Regulation 2600 Blair Stone Road Tallahassee, FL 32301-8241

CONTRACT N62467-87-C-0038, FIREFIGHTING TRAINING FACILITY, NTC

ORLANDO, FL

Dear Mr. Fancy:

Enclosed is the permit application fee for the above subject project as submitted by NTC letter of 22 February 1990. This has been discussed with Ms. Patty Adams of your staff. The original check was lost in transmittal between NTC, Orlando and your office.

Should you have any questions, please contact Mr. James Santarone at (803) 743-0691.

Sincerely.

Pat. MCCAULE

HEAD, ENVIRONMENTAL ENGINEERING

BRANCH

(1) Check No. 8352 03016257

Copy to:

NTC Orlando (Attn: Mr. William Raspet)

001031

DEPARTMENT OF THE NAVY

NAVAL TRAINING CENTER ORLANDO, FLORIDA 32813-5005

- 22 FEB 1990

DER - BAQM

Mr. Clair Fancy Bureau of Air Quality Management Central Air Permitting Florida Department of Environmental Regulation 2600 Blair Stone Road Tallahassee, FL 32301-8241

Dear Mr. Fancy:

Submitted for your review and issuance of a construction permit is an application with fee for a propane fueled fire fighting training facility, to be located at the Naval Training Center, Orlando.

Mr. William Raspet is available at (407) 646-5837 to respond to any inquiries.

Sincerely,

N. C. Davis

Captain, U. S. Navv

Encl:

(1) Permit Application (3 copies) w/Application Check

cc. C. Collins, c Dist.

Called Mr. Rauget.

So sending Today



11000 Ser NTS526/ 000336 22 FEB 1990

Mr. Clair Fancy
Bureau of Air Quality Management
Central Air Permitting
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-8241

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Sincerely,

N. C. Davis Captain, U. S. Navy

Encl:

(1) Permit Application (3 copies) u/Application Check

Blind copy to: (w/o encl)
DER, Central District
Orange County Pollution Control
SOUTHNAVFACENGCOM (Code 11416)

United States Treasury

8352-03016257

Check No.

18 MAY 90

Pay to the order of FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

PORT HUENEME, CALIFORNIA

200DOLLARS AND OOCENTS

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Florida Department of Environmental Regulation 2600 Blair Stone Road Tallahassee, FL 32301-8241

Subj: CONTRACT N62467-87-C-0038, FIREFIGHTING TRAINING FACILITY, NTC

ORLANDO, FL

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HEAD, ENVIRONMENTAL ENGINEERING

BRANCH

(1) Check No. 8352 03016257

Copy to:

NTC Orlando (Attn: Mr. William Raspet)

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STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

\$ 3-80 pd 5-30-90 Reopt.#151/31 BOB GRAHAM

SOUTH FLORIDA DISTRICT

2269 BAY STREET FORT MYERS, FLORIDA 33901



AC48-181529

VICTORIA J. TSCHINKEL SECRETARY

> PHILIP R. EDWARDS DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES FIRE FIGHTING SOURCE TYPE: TRAINING FACILITY [X] New1 [] Existing1 APPLICATION TYPE: [X] Construction [] Operation [] Modification COMPANY NAME: U. S. Naval Training Center COUNTY: Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) See Attached SOURCE LOCATION: Street Corrine Drive, NTC City Orlando UTM: East North Latitude 28 ° 34 ' 05 "N Longitude 81 ° 20 ' 14 "W APPLICANT NAME AND TITLE: Naval Training Center C/O APPLICANT ADDRESS: Public Works Officer, Bldg. 2025, Orlando, FL 32813-5010 SECTION I: STATEMENTS BY APPLICANT AND ENGINEER A. APPLICANT I am the undersigned owner or authorized representative* of Orlando, Florida I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further I agree to maintain and operate the pollution control source and pollution control Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitte establishment. *Attach letter of authorization Signed** Captain, U.S. Nany Name and Title (Please Type)					
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COMPANY NAME: U. S. Naval Training Center Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) See Attached SOURCE LOCATION: Street Corrine Drive, NTC UTM: East North Latitude 28 ° 34 ' 05 "N Longitude 81 ° 20 ' 14 "W APPLICANT NAME AND TITLE: Naval Training Center APPLICANT ADDRESS: Public Works Officer, Bldg. 2025, Orlando, FL 32813-5010 SECTION I: STATEMENTS BY APPLICANT AND ENGINEER A. APPLICANT I am the undersigned owner or authorized representative* of Orlando, Florida I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further I agree to maintain and operate the pollution control source and pollution contro facilities in such a manner as to comply with the provision of Chapter 403, Florid Statutes, and all the rules and regulations of the department and revisions thereof. also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitte establishment. *Attach letter of authorization	SOURCE TYPE:	TRAINING FACILITY [X] N	lew ^l [] Exis	tingl	
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Date: 22 FEB 1990 Telephone No.	permit are true I agree to ma facilities in Statutes, and a also understand and I will promestablishment.	e, correct and complete to the best intain and operate the pollution such a manner as to comply with all the rules and regulations of to that a permit, if granted by the mptly notify the department upon authorization Signed Name Na	st of my knowl control sour the provision the department, sale or legal N. C. Davis Captain, U. S. Navne and Title	edge and belief. rce and pollution n of Chapter 403 and revisions th will be non-tra transfer of the	contro Florida ereof. nsferabla

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project hav been designed/examined by me and found to be in conformity with modern engineerin principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

1 See Florida Administrative Code Rule 17-2.100(57) and (104)

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(
an effluent that complies wit rules and regulations of the furnish, if authorized by the	ies, when properly maintained and operated, will discharge hall applicable statutes of the State of Florida and the department. It is also agreed that the undersigned will owner, the applicant a set of instructions for the proper the pollution control facilities and, if applicable?
	Gary L. Wingfield, P.E.
	Name (Please Type)
	Liebtag, Robinson & Wingfield, Inc.
	Company Name (Please Type) 4811 Beach Boulevard, Suite 400
	Tacksonville Florida 32207

Mailing Address (Please Type)

Florida Registration No. 14924 Date: 9/14/89 Telephone No. (904) 396-4600

SECTION II: GENERAL PROJECT INFORMATION

Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State

See Attached
Schedule of project covered in this application (Construction Permit Application Onl
Start of Construction Completion of Construction
Costs of pollution control system(s): (Note: Show breakdown of estimated costs onl for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)
Not Applicable
·

	- ·	
	this is a new source or major modification, answer the following questies or No)	ons.
•	Is this source in a non-attainment area for a particular pollutant? _	No
	a. If yes, has "offset" been applied?	
	b. If yes, has "Lowest Achievable Emission Rate" been applied?	
	c. If yes, list non-attainment pollutants.	
٠.	Does best available control technology (BACT) apply to this source? If yes, see Section VI.	No
	Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII.	No
٠.	Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source?	No
	Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source?	No
	"Reasonably Available Control Technology" (RACT) requirements apply this source?	No
	a. If yes, for what pollutants?	



SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

,	Contami	.nants	Utilization	, see the second of the second		
Description	Type	% Wt	Rate - lbs/hr	Relate to Flow Diagram		
riphenylphosphate	smoke	100	5.5	E-1 through E-4		
propylene Glyco	ol smoke			E-9		
Tear gas		100	. 0'4 3	E-16		
Sodium bicarbonate	extinquisher	93.4	200	E-1 through E-4		
AFFF- Ultrawet K	extinquisher	40	490	E-1 through E-4		
CO ₂	11 11	100	100	E-1 through E-4		

- B. Process Rate, if applicable: (See Section V, Item 1)
 - Total Process Input Rate (lbs/hr): N/A
 - 2. Product Weight (lbs/hr): N/A
- C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

See Attached Sheets

Name of	£mission ¹		Allowed ² Emission Rate per	Allowable ³ Emission	Potent Emiss	Relate to Flow	
Contaminant	Maximum lbs/hr	Actual T/yr	Rule 17-2	lba/hr	lbs/yr	T/yr	Diagram
	· · · · · · · · · · · · · · · · · · ·						
			-				
				•			

¹⁵ee Section V, Item 2.

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²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BYU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

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D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Conteminent	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
N/A		4		
•				

E. Fuels

	Consi	mption*		
Type (Be Specific)	svq/hr	max./hr	Maximum Heat Input (MMBTU/hr)	
Propane Boiler	346 CFH	692 CFH	.865	
Propane Fireplaces	3,200 CFH	3,200 CFH	8.0	
<u> </u>		<u> </u>		

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis: Percent Sulfur:	0.0		Percent Ash:	0.0		
Density:			Typical Percent		0.0	
Heat Capacity:	21,344	8TU/1b	90,500			_ BTU/gel
	NONE le, indicate the 10.8%		l used for space	heating.		
	quid or solid was	tes generated	and method of di		Lected or	ı site
and pumped	to the wxistin	ng base waste	ewater collect	ion syste	≥m •	
: .						

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See Attached Flow Sheet

H. Emissi	on Stack Ge	ometry and	Flow Cha	racteris	tics (Pro	vide da	ta for e	ach stack)	:
Stack Heig	ht:	12'-8"		ft.	Stack Dia	meter:		8"	ft.
		ft. Stack Diameter:							
Water Vapo	r Content:	*		%	Velocity:		15.8		FPS
	availabl								
	_	SECT	ION IV:	INCINERA	TOR INFOR	MATION	N/A		
Type of Waste	Type O (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type I (Garbag	II Type e) (Patho , ica	10g- (L	ype V iq.& Gas y-prod.)	(Solid By	VI -prod.)
Actual lb/hr Inciner- ated	~								
Uncon- trolled (lbs/hr)	-								
	e Number of					• •		wks/yr	
Date Const	ructed		_	Mode	1 No				
		Volume (ft) ³		elease /hr)	Type	Fuel BT	U/hr	Temperat	
Primary C	hamber								
Secondary	Chamber								
Stack Heig	ht:	ft.	Stack Dia	mter:			Stack 1	emp	
Gas Flow R	ate:		_ACFM		DS C	FM* Vel	ocity: _		FP:
	more tons p					mission	s rate :	in grains p	er stan
Type of po	llution cor	trol devic	e: [] C	yclone	[] Wet S	crubber	[] A	fterburner	
			[] 0	ther (sp	ecify)				
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Brief description of	operating characteristics of control devi	ces:
	N/A	
Ultimate disposal of ash, etc.):	any effluent other than that emitted from	n the stack (scrubber water,
	N/A	
	,	. *
		· ¥ ·

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

- 1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
- 2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
- 3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
- 4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
- 5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
- 6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
- 7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
- 8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

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	<u> </u>	
9.	The appropriate application fee in a made payable to the Department of En	eccordance with Rule 17-4.05. The check should be vironmental Regulation.
10.		ermit, attach a Certificate of Completion of Conce was constructed as shown in the construction
	SECTION VI: BEST	AVAILABLE CONTROL TECHNOLOGY N/A
A.	Are standards of performance for new applicable to the source?	stationary sources pursuant to 40 C.F.R. Part 60
	[] Yes [] No	
	Contaminant	Rate or Concentration
		
	• -	
В.	Has EPA declared the best available yes, attach copy)	control technology for this class of sources (If
	[] Yes [] No	
	Contaminant	Rate or Concentration
c.	What emission levels do you propose	as best available control technology?
	Conteminant	Rate or Concentration
		
		
D.	Describe the existing control and tr	eatment technology (if any).
	1. Control Device/System:	2. Operating Principles:
	3. Efficiency:*	4. Capital Costs:

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*Explain method of determining

. 5.	Useful Life:		6.	Operating Costs:				
7.	Energy:		8.	Maintenance Cost:				
9.	Emissions:							
	Contaminant			Rate or Concentration				
		,						
				· · · · · · · · · · · · · · · · · · ·				
- 10.	Stack Parameters							
a.	Height:	ft.	ь.	Diameter:	ft.			
	Flow Rate:	ACFH	d.	Temperature:	۰F.			
e.	Velocity:	FPS						
	cribe the control and treatment additional pages if necessary).	techn	olog	y available (As many types as appl	icable,			
1.								
8.	Control Device:		ь.	Operating Principles:				
c.	Efficiency:1		d.	Capital Cost:				
e.	Useful Life:		f.	Operating Cost:				
9-	Energy: 2		h.	Maintenance Cost:				
i.	Availability of construction mat	erial	.9 an	d process chemicals:				
j.	Applicability to manufacturing p	roces	ses:					
k.	Ability to construct with contradition proposed levels:	ol de	vice	, install in available space, and (operate			
2.				•				
a.	Control Device:		ь.	Operating Principles:				
e.	Efficiency: 1		ď.	Capital Cost:				
e.	Useful Life:		f.	Operating Cost:				
9.	Energy: 2		h.	Maintenance Cost:				
i.	Availability of construction mat							

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Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate k. within proposed levels: 3. Control Device: 8. b. Operating Principles: Efficiency: 1 c. d. Capital Cost: Useful Life: f. Operating Cost: Energy: 2 Q. h. Maintenance Cost: Availability of construction materials and process chemicals: i. Applicability to manufacturing processes: j. k. Ability to construct with control device, install in available space, and operate within proposed levels: 4. Control Device: Operating Principles: a. ь. Efficiency: 1 Capital Costs: c. Useful Life: f. Operating Cost: Energy: 2 h. Maintenance Cost: g. Availability of construction materials and process chemicals: j. Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: Describe the control technology selected: 1. Control Device: 2. Efficiency: 1 3. Capital Cost: Useful Life: 5. Operating Cost: Energy: 2 7. Maintenance Cost: Manufacturer: Other locations where employed on similar processes: (1) Company: (2) Mailing Address: (3) City: (4) State: ¹Explain method of determining efficiency. 2 Energy to be reported in units of electrical power - KWH design rate.

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(5) Environmental Manager: (6) Telephone No.: (7) Emissions: Conteminant Rate or Concentration (8) Process Rate: b. (1) Company: (2) Mailing Address: (3) City: (4) State: (5) Environmental Manager: (6) Telephone No.: (7) Emissions: Contaminant Rate or Concentration (8) Process Rate: 10. Resson for selection and description of systems: 1Applicant must provide this information when evaluable. Should this informatic available, applicant must state the reason(a) why. SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION N/A A. Company Monitored Data 1no. sites TSP () SO ²⁺ Wind so Period of Monitoring // to	
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SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION N/A A. Company Monitored Data 1	
A. Company Monitored Data 1no. sites TSP () 50 ² * Wind a	on no
1no. sites TSP () 50 ² * Wind s	
Period of Monitoring	pd/di
Period of Monitoring // / to // / month day year month day year	
Other data recorded	
Attach all data or statistical summaries to this application.	
#Specify bubbler (R) or continuous (C)	
+Specify bubbler (B) or continuous (C). DER Form 17-1.202(1)	

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- a. Was instrumentation EPA referenced or its equivalent? [] Yes [] No
- b. Was instrumentation calibrated in accordance with Department procedures?

[] Yes [] No [] Unknown

В.	Meteorological	Data Used	for Air	Quality	/ Modeling
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1.	 Year(a)	o f	data	from		<u> </u>		to		/		
					month	day	year		month	day	year	

- Surface data obtained from (location)_____
- Upper air (mixing height) data obtained from (location)
- 4. Stability wind rose (STAR) data obtained from (location)

C. Computer Models Used

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		, .,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		, ,		
2.	· · · · · · · · · · · · · · · · · · ·	Modified?	If	yes,	attach	description.
3.	<u> </u>	Modified?	If y	yes,	attach	description.
4.		Modified?	If	yes.	attach	deacription.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant Emission Rate
TSP

grams/sec

Modified? If was, attach description.

 50^2

_____grams/sec

E. Emission Data Used in Modeling

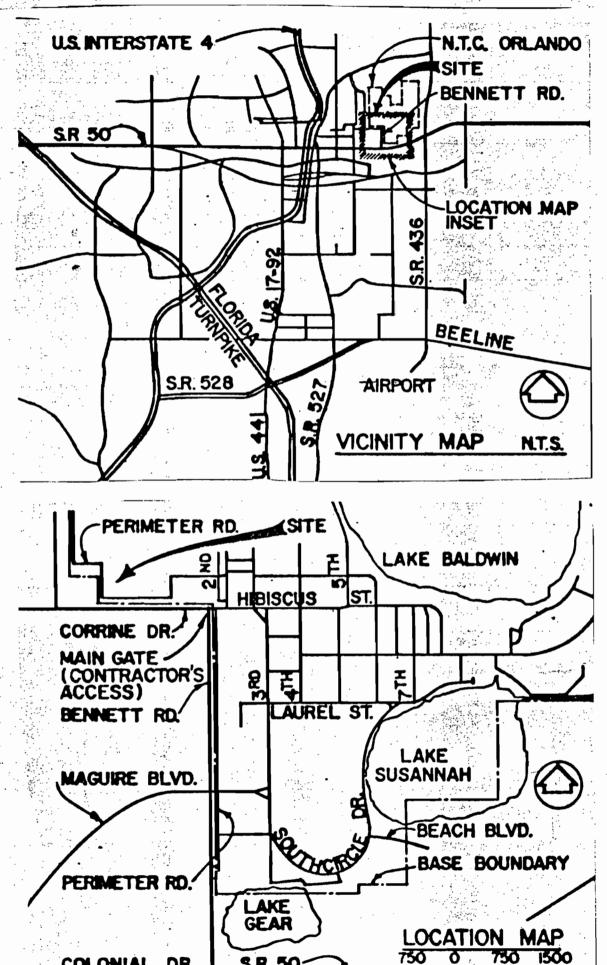
Attach list of emission sources. Emission data required is acurce name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

- F. Attach all other information supportive to the PSD revisw.
- G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, psyroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.
- H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information deacribing the theory and application of the requested best available control technology.

DER Form 17-1.202(1) Effective November 30, 1982 NAVAL TRAINING CENTER FIREFIGHTING TRNG.

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ORLANDO, FLORIDA **FACILITY**

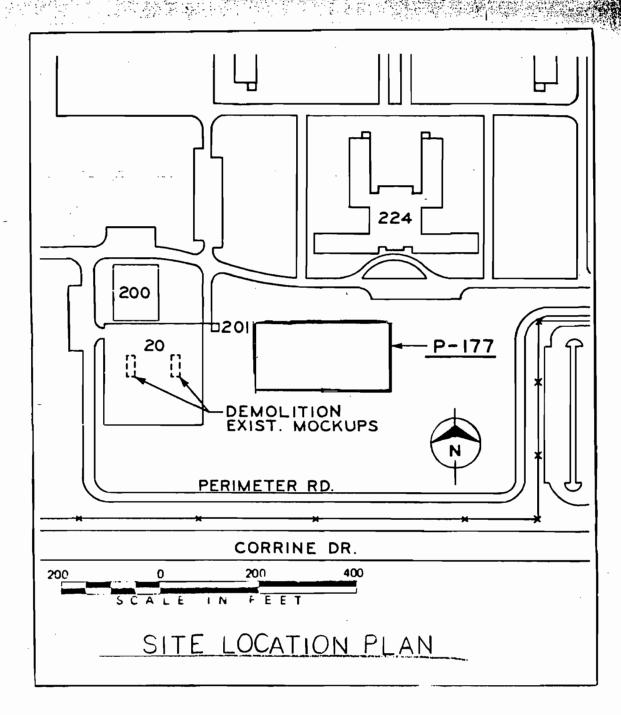


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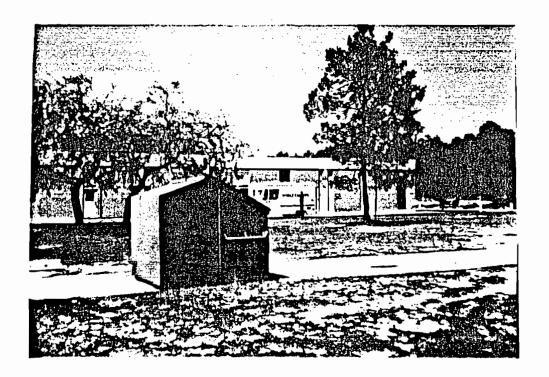


P-177 RECRUIT FIREFIGHTING TRAINING FACILITY NAVAL TRAINING CENTER, ORLANDO, FLORIDA

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DORMITORY NORTH OF SITE FOR NEW FACILITY



CLASSROOM BUILDING NORTHWEST OF SITE FOR NEW FACILITY

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SITE OF NEW FACILITY LOOKING EAST



SITE OF NEW FACILITY LOOKING SOUTH

DESCRIPTION OF FACILITY

This facility will be located at the southwest corner of the Naval Training Center in the vicinity of the existing fire fighting school. Construction of this facility will allow demolition of the existing school, which includes oil fired burners, a 280 gallon waste oil tank, and a 10,000 gallon fuel oil tank, thereby improving the overall air quality. The existing chemical warfare countermeasures training at this same site will be relocated to the new facility.

The facility will be used for an initial exposure and indoctrination of Navy personnel to fire fighting training, as well as chemical warfare countermeasures training. The fire fighting structure is designed to train one (1) class of 160 students per day, and will train five (5) classes each week operating on a single 8 hour shift. The structure will consist of training in the escape of smoke filled areas, and training in the fighting of trash, bilge, and electrical panel type fires. The chemical warfare countermeasures structure will train a class of 100 personnel at a time, two to three classes per day, and 20 classes per week. The structure will consist of a tear gas chamber.

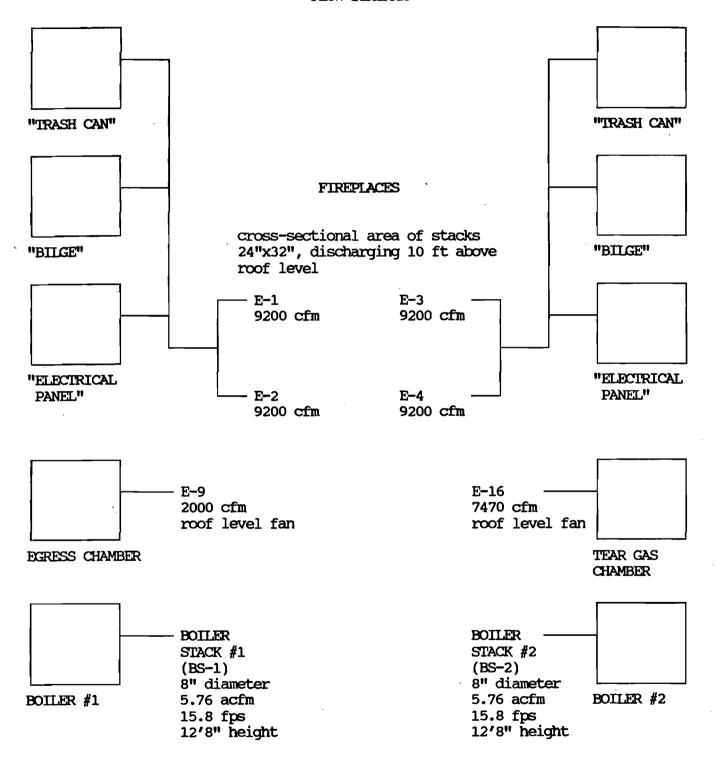
Trash, Bilge, and Electrical Panel Fire Fighting Training: Six LP gas fired fireplace compartments, three (3) on either side of a large staging area, will be used to simulate trash, bilge, and electrical panel fires. The students will line up in the staging area in front of each compartment and fight the fire through the doorway. All fireplaces will run simultaneously. Triphenylphosphate (butylated triphenylphospate) will be used as an artificial smoke in the fireplaces. The LP gas fires will be extinguished using water, sodium dodecylbenzine sulfonate "Ultrawet K" (an AFFF substitute), sodium bicarbonate (a potassium bicarbonate (PKP) substitute), and carbon dioxide.

Smoke Filled Area Training: An emergency egress chamber will be provided which will present the trainee with a loss of light and a high temperature, smoky environment. The trainee will enter and leave the chamber through smoke filled entry ways. These entry ways shall be designed to block light from entering the main chamber. Once inside the dark chamber, the trainee will follow a rope lanyard which will eventually lead him to the smoke filled exit. The main chamber will be heated to 110 degrees Fahrenheit during the training scenario. Propylene glycol will be used as an artificial smoke in the egress chamber.

Chemical Warfare Countermeasures Training: Personnel will enter the gas chamber wearing the MK-3 gas mask. Tear gas will be made in the chamber on a hot plate prior to the entering of the personnel. The personnel will remove their gas masks in the chamber and will be exposed to the tear gas. When the training is complete, the personnel will exit the chamber to an area outside where they can get fresh air. After completion of the gas training, the emergency exit and vent doors will be opened and the exhaust system will be energized to remove the tear gas from the chamber.

<u>Utilities</u>: The facility will have two LP gas fired hot water heating boilers, with a heat input capacity of 865,000 BTU/hr each. Normally only one boiler will be used at a time, and the second boiler will act as a backup.

FLOW DIAGRAM



FIREPLACE CALCULATIONS

The facility will consist of a total of six (6) IP gas fired fireplaces used to simulate trash can (class A), bilge (class B), and electrical panel (class C) fires. Water will be used to extinguish the "trash can" fires; water, Ultrawet K (an AFFF substitute), and sodium bicarbonate (a potassium bicarbonate (PKP) substitute) will be used to extinguish the "bilge" fires; and carbon dioxide will be used to extinguish the "electrical panel" fires. The sodium bicarbonate will contribute minor amounts of particulates to the air emissions from the fireplaces. The visible emissions from the fireplaces will be comprised of artificial smoke (triphenylphosphate), a white colored hot air/aerosol gas with no particulates.

fuel: propane (IP gas)
sulfur content negligible
density of 4.24 lb/gal (liquid)
heat content of 2,500 BTU/cf (90,500 BTU/gal)

Facility will operate 8 hours/day, 5 days/week, 50 weeks/year for a total of 2000 hours/year, generating 60 fires/hours (with an average duration of 2 minutes/fire) for a total of 480 fires/day:

fire type	propane demand (cfm/fire)	number of fires per day	average fire duration (min)	total propane use (cf/day)
"trash can"	10	160	2	3,200
"bilge"	65	160	2	20,800
"electrical panel"	5	160	2	1,600
				25,600 (3,200 cf/hr)

(25,600 cf propane/day)(day/8 hours) = 3,200 cf propane/hour (3,200 cf propane/hour)(2,500 BTU/cf propane)(1 gal propane/90,500 BTU) = 88.4 gal propane/hr

From EPA Publication AP-42, COMPILATION OF AIR EMISSION FACTORS, Third Edition, Table 1.5-1, "Emission Factors For LPG Combustion":

				lb/hr	*. *	tons/yr (based on 2000 hr/yr)
particulates:	(0.44 lb/1000			= 0.039	=	0.039
SOX:	(0.09S lb/1000			= 0.00	=	0.00
NOX:	(12.4 lb/1000			= 1.1	=	1.1
∞ :	(3.1 lb/1000	gal)(88.4	gal/hr)	= 0.27	=	0.27
voc:	(0.52 lb/1000	gal)(88.4	gal/hr)	= 0.046	=	0.046

Particulate emissions resulting from sodium bicarbonate usage:

10 lbs of sodium bicarbonate will be used per fire on the class B "bilge" fires. Particulate emissions resulting from sodium bicarbonate are 0.020 lb/fire for fires using portable extinguishers, and 0.005 lb/fire for fires using twin agent extinguishers.

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80 fires/hr using portable extinguishers: (0.020 lb/fire)(80 fires/hr) = 1.6 lb/hr
80 fires/hr using twin agent extinguishers: (0.005 lb/fire)(80 fires/hr) = 0.4 lb/hr
160 fires/hr
2.0 lb/hr
(2.0 tons/yr)
```

Triphenylphosphate (butylated triphenylphosphate) will be used as an artificial smoke. 0.088 gal of triphenylphosphate will be used per fire (0.088 gal/fire = 5.3 gal/hr = 11,000 gal/yr). Although the triphenylphosphate will produce a visible emission (a white colored hot air/ aerosol mixture composed of the artificial smoke and water vapor) the emission will evaporate to a colorless gas with no particulates within 100 feet of the stack.

Total Emissions From the Fireplaces:

	lb/hr	tons/yr
particulates:	2.0	2.0
NOX:	1.1	1.1
voc:	0.27 0.046	0.27 0.046
1		

Fireplaces (total emissions for 6 fireplaces):

Name of	Emission		Allowed Emission	Allowable Emission	Potent Emiss	Relate to Flow Diagram	
Contaminant	Maximum lbs/hr	Actual T/yr	l Rule lbs/hr lbs/yr	T/yr			
particulates	2.0	2.0			4000	2.0	E-1 - E-4
SOX							- 11
NOX	1.1	1.1			2200	1.1	11
8	0.27	0.27			540	0.27	11
voc	0.046	0.046			92	0.046	17
							11

Note: Visible emissions from the fireplace exhausts will be comprised of artificial smoke, a white colored hot air/aerosol mixture, and water vapor, both of which will evaporate to a colorless gas with no particulates resulting from the artificial smoke. Triphenylphosphate (butylated triphenylphosphate) will be used for artificial smoke.

Egress Chamber:

Name of	Emission		Allowed Emission	Allowable	Potent Emiss	Relate to Flow		
Contaminant	Maximum lbs/hr	Actual T/yr	Rate per Rule 17.2	r Emission lbs/hr lbs/yr		T/yr	Diagram	
NONE	*visible	missions					E-9	
		-		M.A.				

* Note: Visible emissions from the egress chamber will be comprised of artificial smoke, a white colored hot air/aerosol mixture, and water vapor, both of which will evaporate to a colorless gas with no particulates resulting from the artificial smoke. Propylend glycol will be used for artificial smoke.

BOILER CALCULATIONS

Two 865,000 BTU/hr (heat input) how water boilers will provide heating for the facility. Normally only one boiler will be used at a time, and the remaining boiler will be stand-by.

fuel: propane (LP gas)

sulfur content negligible

density of 4.24 lb/gal (liquid)

heat content of 2,500 BIU/cf (90,500 BIU/gal)

(865,000 BIU/hr)(gal propane/90,500 BIU) = 9.56 gal propane/hr

From EPA Publication AP-42, COMPILATION OF AIR EMISSION FACTORS, Third Edition, Table 1.5-1, "Emission Factors For LPG Combustion":

particulates SOX NOX CO VOC	0.09S 12.4 3.1	lb/1000 lb/1000 lb/1000 lb/1000 lb/1000	gal, gal gal	where	"S"	is	sulfur	content
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						lb/hr		tons/yr (based on 2080 hr/yr)
particulates:	(0.44	lb/1000	gal)(9.56	gal/hr)	=	0.0042	=	0.0044
SOX:	(0.095	lb/1000	gal)(9.56	gal/hr)(0)	=	0.00	=	0.00
NOX:			gal)(9.56			0.12	=	0.12
∞ :			gal)(9.56		=	0.030	=	0.030
VOC:			gal)(9.56		=	0.0050	=	0.0052

Total Boiler Emissions (from each boiler):

	lb/hr	tons/yr
particulates: SOX: NOX: CO: VOC:	0.0042 0.12 0.030 0.0050	0.0044 0.12 0.031 0.0051

Boilers (2 boilers, emissions identical for each):

Name of — Contaminant	Emission		Allowed Emission	Allowable Emission	Poter Emis	Relate to Flow	
	Maximum lbs/hr	Actual T/yr	Rate per Rule 17.2	lbs/hr	lbs/yr	T/yr	Diagram
particulates	0.0042	0.0044			8.4	0.0042	BS-1/BS-2
SOX					<u></u>		11
NOX	0.12	0.12		,	240	0.12	11
α	0.030	0.031			60	0.031	11
voc.	0.0050	0.0051			10	0.0051	11

Tear Gas Chamber:

Nome of	Emission		Allowed Emission	Allowable	Potent Emiss	Relate	
Name of Contaminant	Maximum lbs/hr	Actual T/yr	1 ,		lbs/yr	T/yr	to Flow Diagram
tear gas	0.043	0.023			46	0.023	E-16
						,	
			· 				
							
•							

TEAR GAS CALCULATIONS

A tear gas (alpha-chloroacetophenone) chamber will used to provide chemical warfare countermeasures training. The chamber will be used to train one class of 100 personnel at a time, two to three classes per day, and 20 classes per week.

Tear gas will be made in the chamber on a hot plate prior to the entering of the personnel. 0.043 pounds of tear gas will be used per class. The personnel receiving training will enter the chamber wearing the MK-3 gas mask. The personnel will then remove their gas masks in the chamber and will be exposed to the tear gas. When the training is complete, the personnel will exit the chamber where they can get fresh air.

After completion of the training, the exhaust system will be energized to exhaust the tear gas laden air from the chamber. The chamber will be located a sufficient distance away from nearby structures to prevent the migration of tear gas into other areas or buildings. A roof level exhaust fan will be provided to disperse the tear gas into the air above the building to prevent recirculation back into the chamber. The site is located with the prevailing winds from the south at 10 mph such that there will be no migration to other areas and buildings on or off the base.

Total Tear Gas Emissions:

.043 lb/hr .023 tons/yr

