

## STATEMENT OF BASIS

Title V Air Operation Permit Revision  
Permit No. 0330082-016-AV

### APPLICANT

The applicant for this project is the United States Navy Naval Air Station (NAS) Pensacola facility. The applicant's responsible official and mailing address are: Mr. Mark W. Gibson, Environmental Director, NAVFAC SE, Public Works Department, 310 John Towers Road, Building 3560, Pensacola, Florida 32508.

### FACILITY DESCRIPTION

The applicant operates the existing NAS Pensacola facility, which is located in Escambia County at 310 John Towers Road, Pensacola, Florida.

The primary mission of the NAS Pensacola Complex is to provide training of Navy, Marine and Air Force personnel. Several training commands are located at this base, including Naval Education Training Command (NETC). The Public Works Department (PWD) provides public works support to all tenants on NAS Pensacola. Its operations include maintenance, repair, construction, utilities, transportation services, engineering services and shore facilities planning.

NAS Pensacola Complex is a Naval Training Facility which provides facilities and support for air training operations 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 aviation activities. Air pollutant emitting activities associated with NAS result from facilities required for the training activities such as fuel storage tanks; fuel burning equipment such as boilers, heaters, and emergency generators. The PWD maintains support facilities, such as the boiler plants, emergency generators and other facilities.

This facility consists of natural gas fired steam boilers; gasoline dispensing facilities; one bulk gasoline distribution plant; and stationary emergency internal combustion engines (ICE). The facility has a facility-wide natural gas fuel usage capacity limit of 385 million cubic feet per year requested by the Permittee to help simplify record keeping while maintaining the facility as a minor stationary source for Prevention of Significant Deterioration (PSD).

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
039	16 Natural Gas Fired Steam Boilers, totaling 53.11 MMBtu/hr
041	One (1) GDF consisting of four (4) gasoline storage tanks w/ throughput greater than 100,000 gal/month
045	One (1) GDF consisting of two (2) gasoline storage tanks w/ throughput greater than 10,000 gal/month
046	Seven (7) Gasoline Dispensing Facility consisting of one (1) gasoline storage tank each w/ throughput less than 10,000 gal/month
047	Gasoline Distribution Terminal-Bulk Tank
048	Stationary Emergency ICE constructed prior to 6-12-2006
049	Stationary Emergency CI ICE displacement <30 liters per cylinder constructed after 6-12-2006
052	Portable Hot Mix Asphalt Plant w/ Baghouse
<i>Unregulated Emissions Units and Activities (see Appendix U, List of Unregulated Emissions Units and/or Activities)</i>	
040	65 Natural Gas Fired Hot Water Boilers/heaters totaling 151 MMBtu/hr

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### APPLICABLE REGULATIONS

Based on the Title V air operation permit revision application received on November 14, 2017, this facility is not a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
<i>Federal Rule Citations</i>	
40 CFR 60, Subpart A, NSPS General Provisions	039, 041, 045, 046, 047, 049
40 CFR 60, Subpart I	052
40 CFR 60, Subpart IIII	049
40 CFR 63, Subpart BBBB	047
40 CFR 63, Subpart CCCCC	041, 045, 046
40 CFR 63, Subpart ZZZZ	048
<i>State Rule Citations</i>	
Rule 62-4.070, F.A.C. (Permitting)	039, 041, 045, 046, 047, 049
Rule 62-204.800, F.A.C. (Federal Regulations Adopted)	039, 041, 045, 046, 047, 049
Rule 62-210.200, F.A.C. (Definitions)	039, 041, 045, 046, 047, 049
Rule 62-210.300, F.A.C. (Permits Required)	039, 041, 045, 046, 047, 049
Rule 62-210.370, F.A.C. (Emissions Computation and Reporting)	039, 041, 045, 046, 047, 049
Rule 62-210.700, F.A.C. (Excess Emissions)	039, 041, 045, 046, 047, 049
Rule 62-213.205, F.A.C. (Annual Emission Fee)	039, 041, 045, 046, 047, 049
Rule 62-213.410, F.A.C. (Permit Changes without Revision)	039, 041, 045, 046, 047, 049
Rule 62-213.440, F.A.C. (Permit Content)	039, 041, 045, 046, 047, 049
Rule 62-252.300, F.A.C. (Gasoline Dispensing Facilities)	041, 045
Rule 62-296.320, F.A.C. (General Pollutant Emission Limiting Standards)	039, 041, 045, 046, 047, 049
Rule 62-296.406, F.A.C. (BACT)	039, 041, 045, 046, 047, 049
Rule 62-297.310, F.A.C. (General Compliance Testing Requirements)	039, 041, 045, 046, 047, 049
Rule 62-297.401, F.A.C. (Compliance Test Methods)	039, 041, 045, 046, 047, 049

### PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility to incorporate requested changes by the permittee to correct various stationary compression ignition (CI) engine sizes, displacement and manufacturer dates for the emergency engines in emissions unit (EU) 048 and 049. This revision also includes the removal of one emergency engine from EU 048.

This project follows Title V Revision Permit 0330082-015-AV which incorporated new emergency generator engines and corrected some of the makes and dates of manufacture for the engines in emissions unit (EU) 048 and 049. Permit 0330082-013-AC authorized the installation of a portable Hot Mix Asphalt Plant, (EU) 052. Permit No. 0330082-013-AC was concurrently processed with the Title V Revision 0330082-014-AV which incorporated EU 052 into the facility's TV permit.

### PROCESSING SCHEDULE AND RELATED DOCUMENTS

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Title V Air Operation Permit Renewal issued September 18, 2014  
Title V Air Operation Permit Revision 0330082-014-AV effective August 8, 2017  
Title V Air Operation Permit Revision 0330082-015-AV effective October 3, 2017  
Application for a Title V Air Operation Permit Revision received November 14, 2017.

### PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 9711 – National Security.

North American Industry Classification System (NAICS): 928110 – National Security

HAP: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

GHG: The facility is not identified as a major source of greenhouse gas (GHG) pollutants.

### PROJECT REVIEW

Changes to the permit made as part of this revision are shown in ~~strike through~~ format for deletions and in double underline format for additions. For ease of identification, all changes have also been **highlighted in yellow** within the permit document.

The following is a brief description of the changes that were made as part of this revision:

1. To reflect the changes authorized by Permit No. 0330082-016-AV, the following changes were made to the emission unit description table of EU048 (only the rows with changes are shown):

Equip ID	Bldg ID	Date of Manufacture	Make	Displacement (L/Cyl)	Hp/KW	Type	Fuel
<del>IC008</del>	<del>0639</del>	<del>1-Jan-99</del>	<del>Detroit Diesel</del>	<del>&lt;10</del>	<del>168/125</del>	<del>Sta. CI</del>	<del>Diesel</del>
IC022	<del>1940/1878</del>	1-June-97	Cummins	<10	<del>270 / 201</del> <u>355/265</u>	Sta. CI	Diesel
IC078	3963	< 2002	Detroit Diesel	<10	<del>550 / 410</del> <u>643/480</u>	Sta. CI	Diesel
IC091	0038	<u>9</u> -Aug-05	John Deere	<10	81 / 60	Sta. CI	Diesel
IC097	3260	1-Jan-01	John Deere	<del>1-1</del> <u>&lt;10</u>	71 / 40	Sta. CI	Diesel
IC102	4125	1-Jan-05	John Deere	<del>1-5</del> <u>&lt;10</u>	617 / 460	Sta. CI	Diesel
IC103	0777	1-Jan-05	John Deere	<del>1-1</del> <u>&lt;10</u>	250 / 186	Sta. CI	Diesel
IC122	0628	1-Jan-05	John Deere	<del>1-1</del> <u>&lt;10</u>	99 / 74	Sta. CI	Diesel

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2. To reflect the changes authorized by Permit No. 0330082-016-AV, the following changes were made to the emission unit description table of EU049 (only the rows with changes are shown):

Equip ID	Bldg ID	Date of Manufacture	Make	Displacement (L/Cyl)	Hp/KW	Type	Fuel
IC119	1500M	26-Apr-11	Cummins	<del>1.1</del> <u>0.7</u>	145 / 108	Sta. CI	Diesel
IC066	1898	1-Sep-12	John Deere	0.6	<del>50</del> <u>49</u> / 37	Sta. CI	Diesel
IC123	4191	11-Jan-10	John Deere	<del>0.8</del> <u>0.6</u>	97 / 72	Sta. CI	Diesel
IC125	4149	9-Dec-08	John Deere	1.4	360 / <del>250</del> <u>268</u>	Sta. CI	Diesel
IC126	1901	2 Sep-10	John Deere	<del>0.8</del> <u>0.6</u>	80 / 60	Sta. CI	Diesel
IC127	3861	1-Jan-10	Yanmar	<del>0.4</del> <u>0.3</u>	18.5 / 13	Sta. CI	Diesel
IC128	1902	<del>4</del> <u>2</u> -Sep-10	John Deere	0.6	50 / 37	Sta. CI	Diesel
IC129	<del>1061</del> <u>1081</u>	<u>2</u> -Sep-10	John Deere	0.6	80 / 60	Sta. CI	Diesel
IC131	0639	16-Aug-10	Cummins	<del>1.1</del> <u>0.7</u>	145 / 108	Sta. CI	Diesel
IC132	3558	10-Feb-07	John Deere	<del>0.7</del> <u>1.0</u>	64 / 48	Sta. CI	Diesel

### CONCLUSION

This project revises Title V air operation permit No. 0330082-012-AV, which was effective on September 18, 2014. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.