

Statement of Basis for the
Air Operating Permit –
- FINAL -

**Naval Air Station Whidbey
Island**

Oak Harbor, Washington

April 27, 2016

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PERMIT INFORMATION

Naval Air Station Whidbey Island

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November 6, 2009	August 1, 2017

1. Introduction

Naval Air Station Whidbey Island, also referred to herein as NASWI, NAS Whidbey Island, or the facility, is comprised of three main areas under control of the Navy,

which are located at three geographically separate sites: Ault Field, Area 6 and the Seaplane Base. The Ault Field and Seaplane Base are approximately five miles apart and are separated by the town of Oak Harbor.



Figure 1) NASWI base location on Whidbey Island

Ault Field, Area 6, and the Seaplane Base comprise the source covered under this Air Operating Permit (AOP) and Statement of Basis.

Activities at Ault Field include the maintenance and rework of military aircraft, aircraft operations training, search and rescue, and other aircraft-related and squadron support activities. Composting and recycling activities occur at Area 6, which is adjacent to Ault Field.

The Seaplane Base was not originally included as part of the Title V source but was incorporated into the Title V AOP as part of this second renewal. At the Seaplane Base, which was the original base facility of the NAS, personnel currently perform maintenance on land-based vehicles, monitor a groundwater remediation project from a government gas station release, operate the navy exchange retail

commissary and Naval Exchange (NEX) store, and perform other activities that support the mission of the base. Seaplanes are no longer located at the Seaplane Base. Air emissions sources at the Seaplane Base include a gasoline dispensing station, several emergency generators, boilers, and a vehicle paint booth. By itself, the Seaplane Base is not a major source according to Title V. While no significant changes to operations or sources at the Seaplane Base have occurred, the Seaplane Base was incorporated into the AOP during this second AOP renewal at the behest of NASWI. Both properties, while not contiguous, are under the same ownership and operational control.

NASWI is a designated major source for the air operating permit program because the facility has the potential to emit greater than 100 tons per year of carbon monoxide (CO), nitrogen oxides (NO_x), sulfur oxides (SO_x), and volatile organic compounds (VOC), and greater than 25 tons per year of combined Hazardous Air Pollutants (HAP). These air pollutants are defined as regulated air pollutants in the Washington Administrative Code (WAC) 173-401.

The purpose of this Statement of Basis is to set forth the legal and factual basis for the conditions of the NASWI AOP in accordance with WAC 173-401-700(8) and to provide background information to facilitate review of the permit by interested parties. This Statement of Basis is not a legally enforceable document.

Permit Changes in the Second Renewal

The Northwest Clean Air Agency (NWCAA) received an application for the second renewal of the NASWI AOP on November 6, 2009. Several pieces of equipment have been added to or removed from the NASWI facility since the last permit modification. In addition, boilers and engines that hadn't been regulated before are now subject to newer federal rules, which are included in this AOP renewal. Changes specific to each permit section are listed below.

Overall

The entire air operating permit was reformatted to current Agency standard. Both the AOP and this SOB were given the new cover page.

General Information and Attest

Names of the Responsible Official and Inspection Contact were updated. The name of the Agency engineer responsible for the preparation of this AOP renewal was updated.

AOP Section 1 Emission Unit Identification

The single table in Section 1 was reorganized and split into two separate tables. AOP Table 1-1 lists emission units that qualify as significant emission units but for which no OAC conditions or other requirements (such as the Aerospace NESHAP) apply. Such significant emission units have no specifically applicable requirements because they were, in general, installed prior to the new source review requirements. However, all Standard Terms and Conditions (AOP Sections 2 and 3)

and Generally Applicable Requirements (AOP Section 4) do apply to these units. AOP Table 1-2 lists the significant emission units for which there are specifically applicable requirements, with clickable links to their respective tables in AOP Section 5 Specifically Applicable Requirements.

[AOP Section 2 Standard Terms and Conditions](#)

Section 2 was updated with current citation dates and NWCAA standard language, which includes new and modified applicable regulations such as state greenhouse gas reporting requirements.

[AOP Section 3 Standard Terms and Conditions for NSPS](#)

Section 3 was updated with current NWCAA standard language consistent with the New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) that apply to the NASWI facility. New and modified applicable regulations and updated citation dates are included.

[AOP Section 4 and 5 Generally and Specifically Applicable Requirements](#)

The Generally Applicable Requirements of Section 4 were reviewed and updated. Section 4 primarily lists NWCAA and Washington Administrative Code (WAC) regulations, which often lack specific methods for compliance determination and require that additional monitoring, recordkeeping and recording provisions be added to the AOP for the purpose of compliance determination. This aspect of Air Operating Permits, known as gap-filling, is discussed further in the Gap Filling section of this document. Most gap-filled requirements in the AOP Section 4 were modified substantially for this renewal.

Section 5 has been split into separate tables numbered 5-1 through 5-28, which are distributed among four different emission unit categories: boilers and heaters, painting and repainting operations, gasoline dispensing stations, and stationary internal combustion engines. New requirements have been added, such as Subpart ZZZZ of 40 CFR 63 and Subpart IIII of 40 CFR 60 for the many reciprocating engines used to power generators at the facility. Modifications were made to account for emission units that were added, modified, or permanently shut down since the last permitting action.

[AOP Section 6 Inapplicable Requirements](#)

The number of potentially applicable requirements that were determined to be inapplicable was pared down from the previous AOP. Obviously irrelevant requirements were removed from the table of inapplicable requirements. The permit shield extends to cover the inapplicable requirements listed in Section 6 of the AOP per WAC 173-401-640.

[Changes made due to comments on the DRAFT AOP](#)

NASWI submitted mostly minor comments and one significant comment during the public comment period for the draft AOP dated April 17, 2013. At the request of

NASWI, the opacity monitoring requirement for boilers less than 8 million British thermal units per hour (MMBtu/hr) heat input and infrared heaters was changed from once per quarter to annually. Overall, any required monitoring for these emission units is an increase in monitoring frequency over the previously issued AOP.

The following changes were made in response to NASWI comments on the April 17, 2013 draft AOP.

DRAFT AOP

AOP Table 1.2, page 11: Changed "Bag House" to "Baghouse".

AOP term 4.12, page 61: In the Monitoring/Recordkeeping/Reporting column, changed the monitoring schedule for boilers < 8 MMBtu/hr and infrared radiant heaters from "once per quarter" to "annually and no later than 14 months from the anniversary of the previous observation".

AOP term 5.1.1, p. 64: Changed "<0.3%" to "≤0.3%" in the Monitoring/Recordkeeping/Reporting column.

AOP term 5.4.1, p. 70: Corrected the spelling of "Mehtod" to "Method" in the Description column.

AOP term 5.6.9, p. 78: Deleted "(1)" and "(3)" from the Description column, as these are confusing. These numerical bullets were carried over from the rule itself; however, the provision was split between two AOP terms, so the numerical bullets were out of order as presented in the AOP.

AOP term 5.6.10, p. 79: Deleted "(2)" and "(4)" from the Description column. Same reason as the change described above.

AOP term 5.7.7, p. 90: In the Monitoring/Recordkeeping/Reporting column, the first paragraph was changed from:

"Continuously monitor the water flow rate and read and record the water flow rate once per shift during which coating operations occur."

To:

"If a conventional waterwash system is used, continuously monitor the water flow rate and read and record the water flow rate once per shift. If a pumpless system is used, continuously monitor the booth parameter(s) that indicate performance of the booth per manufacturer's recommendations to maintain the booth with the acceptable operating efficiency range and read and record the parameters once per shift."

AOP section 5.4.2, p. 125: Changed "engins" to "engines".

AOP table 5-17, p. 126: Changed "Requirments" to "Requirements".

DRAFT Statement of Basis

No comments received on the Statement of Basis. A list of changes made to the first DRAFT AOP was added to section 1.1.

Permit Changes during 2015 modification to AOP #008R2

40 CFR 63 Subpart DDDDD (the Boiler MACT) was recently finalized by EPA. The rule was not part of the 2013 AOP renewal (AOP #008R2). WAC 173-401-730 requires that NWCAA incorporate newly applicable rules into the AOP. To meet this obligation, NWCAA reopened AOP #008R2 to add the Boiler MACT requirements.

While the AOP was open, NASWI requested additional changes. The following additional changes were made:

- Corrected typographical errors.
- Updated emergency generators list (removed generators that were decommissioned and added new generators that were installed).
- Added two n-methyl perylodone stripping tanks that are existing at NASWI but were previously not listed in the AOP.
- Removed requirements for Aerospace NESHAP depainting activities (40 CFR 63.746) because these requirements only apply at facilities that depaint 6 or more complete aircraft. NASWI doesn't depaint any complete aircraft.
- Added a new powder coating booth.
- Added the T-17 and auxiliary engine test stands. These test stands are existing units at NASWI but weren't previously listed in the AOP.
- Added the composting facility, including tipping/mixing building, curing/screening pad, 8 in-vessel composting vessels, and biofilter to control odor from the composting vessels. The composting facility is existing at NASWI but wasn't previously listed in the AOP.
- To alleviate confusion, removed repetitive cross-references in Section 5 which pointed to the records retention requirement in Section 2.4.3. Records must continue to be retained in accordance with AOP Section 2.4.3.
- NASWI requested a reduction in the frequency of visible emission monitoring for generators that normally operate without visible emissions. This request was supported by visible emission monitoring data provided on August 15, 2014 for over 50 generators. NASWI performed monthly monitoring for these generators for 1 year or more. In each case, no visible emissions were noted. Based on this information, NWCAA reduced the visible monitoring requirement in AOP term 4.15 to quarterly for generators that exhibited no visible emissions during the previous 6 months of monitoring. The monitoring method includes a provision to increase monitoring to monthly if visible emissions are observed during a quarterly monitoring event.

- NASWI requested removal of Conditions 5.13.6, 5.14.6, 5.15.6, and 5. which require that NASWI keep vapor tightness testing records for trucks that deliver fuel to the NASWI gas stations. NASWI does not own or operate the delivery trucks. The requirements of WAC 173-491-040(6)(d) can be interpreted to apply to the facility where fuel is received. However, for other gas stations, NWCAA generally interprets that these requirements apply to the delivery company, and not to the facility where the gas is received. This requirement has been removed from the AOP.

In accordance with WAC 173-401-730, this permit modification is processed as a reopening for cause. As such, the procedures for making the modification are the same procedures as apply to initial permit issuance. This includes a 30-day public comment period and 45-day EPA review.

Permit Changes during 2016 modification to AOP #008R2M1

NASWI requested an administrative modification by email on April 25, 2016. The following changes were made during the modification:

- Correct typo – “Hangar” was misspelled as “Hanger” in one place in the AOP and two in the SOB.
- Correct numbering on the headings, sub-headings, and table numbers in Sections 2-5 of the AOP. The Word numbering format used when drafting the 2015 modification was corrupted leading to erroneous numbering.
- Correct the date identified in AOP terms 5.1.8, 5.2.4, 5.7.1 to January 31, 2016.
- Change the installation date for boiler BOI-0108-01 to 2001 instead of 2011 in SOB table 2-1. The boiler MACT classification of the boiler was changed from “new” to “existing” accordingly. 2011 was the year the burners were replaced, not the year the boiler was installed. No changes needed to the AOP.
- Update the responsible official (list the new commanding officer instead of the old one who is no longer at the facility).

2. Facility Description

General Facility Description

The NASWI installation is one of the larger naval installations in the Northwest. NASWI supports the MH-60R Seahawk helicopter, EA-18G Growler, P-3C Orion, EP-3E ARIES II and C-9 Skytrain aircraft. In all, there are approximately 19 active duty squadrons and 2 Ready Reserve squadrons currently based at NASWI. The air station also maintains a Search and Rescue Unit, flying two Sikorsky MH-60S Nighthawks. With the addition of the MH-60S, Navy Search and Rescue provides

maritime, inland and mountainous rescue support for Department of Defense personnel and the greater Pacific Northwest community 24 hours a day.

The mission of NAS Whidbey Island is to provide services and material in support of its fleet. NAS Whidbey Island employs approximately 8,400 military personnel and 2,000 civilian personnel to accomplish this mission. Base operations include, but are not limited to, the following: national defense, maintenance of aircraft fleet, weapons training, aircraft operations training, training to detect and dispose of explosives, and search and rescue operations. The base does not manufacture any products; therefore, there are no associated raw materials, principal products, or by-products.

The Ault Field base, a land plane field, was constructed in 1942 and became a permanent Naval Air Station in 1950.

Initially, the largest source of air contaminants at Ault Field was the central heating plant (Building 384), which consisted of three boilers with a total capacity of 115 million British thermal units per hour (MMBtu/hr) plus individual boilers, each dedicated to providing heat or hot water for one building. Base heating was centralized in 1984 with the removal of four individual boilers and construction of a 59.65 MMBtu/hr (nominal heat input) boiler at Building 384. The new boiler received an Approval to Operate from the NWCAA on September 13, 1984, and was designed to combust natural gas as a primary fuel and number (No.) 2 fuel oil as a backup fuel. Another renovation to Building 384 occurred in 1996, when two of the older boilers (non-permitted, "grand-fathered" boilers) were removed and two 54.8 MMBtu/hr natural gas/JP-8 jet fuel combustion boilers were installed. During the 1996 renovation, the 59.65 MMBtu/hr boiler's backup fuel was switched to JP-8, which at that time had a lower sulfur content than the No. 2 fuel oil. Furthermore, the ability of the boiler to utilize JP-8 as a backup fuel provided for the Navy's required minimum 30-day on-site fuel storage requirement.

Today, the primary emission units are boilers and heaters; painting, cleaning, and paint removal operations; gasoline dispensing stations; and stationary internal combustion engines. In addition, the following operations take place at the facility: a fire training facility, ozone depleting compound-containing equipment, asbestos handling, an explosive ordnance demolition unit, fuel odors, and potentially other nuisance emissions. The next section describes these emission units and activities in more detail.

Emission Unit Description

Emission units at the facility consist of boilers, emergency power generators, organic liquid storage tanks (both above and below ground), jet and propeller engine test cells, equipment that contain ozone depleting compounds, a wood chipper, a metal baler, asbestos, a fire training facility, ordnance demolition, fugitive dust, generators, boilers, and aerospace rework activities, which include cleaning, primer and topcoat applications, chemical paint removal, sand and media

blasting, and housekeeping operations. Unless otherwise noted, all emission units are located at Ault Field, Area 6, or the Seaplane Base.

Boilers and Heaters

These sources supply heat and steam throughout the base. Table 2-1 lists the boilers at NASWI, along with the information necessary to determine their status under the boiler MACT and whether they qualify as IEUs.

Table 2-1 provides a complete list of boilers at NASWI and identifies whether the boiler MACT applies. Units labeled as "No" with footnote 2 or 3 in the "Boiler MACT Applies?" column qualify as insignificant emission units (IEUs) under the AOP program.

Note that a boiler cannot qualify as an IEU if it is subject to a federal rule such as the boiler MACT. Therefore, any boilers identified as "Yes" in the "Boiler MACT Applies?" column are automatically significant emission units no matter what size they are nor what fuel they burn. The applicability of the boiler MACT is further discussed in Section 0 of this document.

Table 2-1 Boilers at NASWI

Base 1	Unit ID	Location	MMBtu per hr	Fuel	Year	MACT New/ Exist.	Tempo -rary?	R&D?	Steam or Hot Water?	H2O Boilers (<1.6 MMBtu/hr)	Boiler MACT Applies?
AF	BOI-0384-04	CHP	59.65	Natural Gas	1987/ 1988	Existing	No	No	Steam	N/A	Yes
AF	BOI-0384-04	CHP	59.65	Jet A	1987/ 1988	Existing	No	No	Steam	N/A	Yes
AF	BOI-0384-06	CHP	54.8	Natural Gas	1996	Existing	No	No	Steam	N/A	Yes
AF	BOI-0384-06	CHP	54.8	Jet A	1996	Existing	No	No	Steam	N/A	Yes
AF	BOI-0384-07	CHP	54.8	Natural Gas	1996	Existing	No	No	Steam	N/A	Yes
AF	BOI-0384-07	CHP	54.8	Jet A	1996	Existing	No	No	Steam	N/A	Yes
AF	BOI-0993-01	Hospital	8.369	Natural Gas	1989	Existing	No	No	Steam	N/A	Yes
AF	BOI-0993-01	Hospital	8.369	LSD/ ULSD	1989	Existing	No	No	Steam	N/A	Yes
SPB	BOI-0022-01	Ware- house	2.20	Natural Gas	1990	Existing	No	No	Steam	N/A	Yes
SPB	BOI-0013-01	Thrift shop	1.60	Natural Gas	1978	Existing	No	No	Steam	N/A	Yes
SPB	BOI-0017-01	Naval Exchange	1.01	Natural Gas	1998	Existing	No	No	Steam	N/A	Yes
AF	BOI-0108-01	Admin. building	1.01	Propane	2001	Existing	No	No	Steam	N/A	Yes

Base 1	Unit ID	Location	MMBtu per hr	Fuel	Year	MACT New/ Exist.	Tempo- rary?	R&D?	Steam or Hot Water?	H2O Boilers (<1.6 MMBtu/hr)	Boiler MACT Applies?
SPB	BOI-0012-01	PBY museum	0.94	Natural Gas	1978	Existing	No	No	Steam	N/A	Yes
AF	BOI-0112-01	Hangar 1	0.94	Natural Gas	2006	Existing	No	No	Steam	N/A	Yes
AF	BOI-2549-01	Auto Hobby	2.25	Propane	1996	Existing	No	No	Hot Water	No	Yes
AF	BOI-2837-01	Survival pool	2.10	Natural Gas	2003	Existing	No	No	Hot Water	No	Yes
AF	BOI-2641-02	PSD	0.63	ULSD	2010	Existing	No	No	Hot Water	Yes	No ²
AF	BOI-0423-01	Weapons	0.60	ULSD	1990	Existing	No	No	Hot Water	Yes	No ²
AF	BOI-2621-01	Liquid oxygen ("LOX")	0.60	ULSD	1990	Existing	No	No	Hot Water	Yes	No ²
AF	BOI-2644-01	NMCI	0.13	ULSD	2009	Existing	No	No	Hot Water	Yes	No ²
AF	BOI-0386-01	Hangar 5	1.50	Natural Gas	2008/ 2010	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-0386-02	Hangar 5	1.50	Natural Gas	2008/ 2010	Existing	No	No	Hot Water	Yes	No ³
SPB	BOI-2826-01	SPB Navy lodge	0.4	Natural Gas	2001/ 2002	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-2758-02	Aviation Physiology	0.4	Natural Gas	2015	New	No	No	Hot Water	Yes	No ³
AF	BOI-2903-01	P-3 wash rack	0.90	Natural Gas	2008/ 2010	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-2903-02	P-3 wash rack	0.90	Natural Gas	2008/ 2010	Existing	No	No	Hot Water	Yes	No ³

Base 1	Unit ID	Location	MMBtu per hr	Fuel	Year	MACT New/ Exist.	Tempo -rary?	R&D?	Steam or Hot Water?	H2O Boilers (<1.6 MMBtu/hr)	Boiler MACT Applies?
AF	BOI-2903-03	P-3 wash rack	0.90	Natural Gas	2008/ 2010	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-2903-04	P-3 wash rack	0.90	Natural Gas	2008/ 2010	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-2593-01	Flight Simulator	0.75	Natural Gas	2015	New	No	No	Hot Water	No	No ³
AF	BOI-2593-02	Flight Simulator	0.75	Natural Gas	2015	New	No	No	Hot Water	No	No ³
AF	BOI-2544-01	Hangar 7	0.65	Natural Gas	2005/ 2008	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-2544-02	Hangar 7	0.65	Natural Gas	2005/ 2008	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-2734-01	Passenger terminal	0.65	Natural Gas	2006/ 2008	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-2837-02	Survival pool	0.65	Natural Gas	2003	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-2771-01	Tactical Support Center	0.45	Natural Gas	1994/ 1995	Existing	No	No	Hot Water	Yes	No ³
SPB	BOI-2938-01	Child Develop. Center	0.33	Natural Gas	2010	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-2836-03	P-3 support	0.26	Natural Gas	2014	New	No	No	Hot Water	Yes	No ³
AF	BOI-2836-01	P-3 support	0.25	Natural Gas	2002/ 2003	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-0420-01	Water Office	0.23	Propane	1998/ 1999	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-2897-01	Firehouse	0.21	Natural Gas	2007	Existing	No	No	Hot Water	Yes	No ³

Base ¹	Unit ID	Location	MMBtu per hr	Fuel	Year	MACT New/Exist.	Temporary?	R&D?	Steam or Hot Water?	H2O Boilers (<1.6 MMBtu/hr)	Boiler MACT Applies?
AF	BOI-2897-02	Firehouse	0.21	Natural Gas	2007	Existing	No	No	Hot Water	Yes	No ³
AF	BOI-2970-01	Flight Simulator	0.15	Natural GAs	2015	New	No	No	Hot Water	Yes	No ³
AF	BOI-0124-02	Portable	2.94	LSD/ULSD	1978	Existing	Yes	No	Steam	N/A	No ⁴

¹ SPB = Seaplane Base; AF = Ault Field

² MACT exemption basis - Hot water boiler rated less than 1.6 MMBTU/hr; Unit is also IEU based on WAC 173-401-533 (2) (g) Combustion source, of less than one million Btu/hr. if using kerosene, No. 1 or No. 2 fuel oil.

³ MACT exemption basis - Hot water boiler rated less than 1.6 MMBTU/hr; Unit is also IEU based on WAC 173-401-533 (2) (e) Combustion source less than five million Btu/hr. exclusively using natural gas, butane, propane and/or LPG.

⁴ MACT exemption basis – Temporary unit.

⁵ LSD = Low sulfur diesel; ULSD = Ultra Low Sulfur Diesel

Painting, Cleaning, and Paint Stripping Operations

Since NASWI has the potential to emit greater than 25 tons per year of Hazardous Air Pollutants (HAPs), the facility is subject to 40 CFR 63 Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities. This regulation is discussed in more detail in Section 0; however, process designations within this regulation define emission units, and so these process designations are presented below for the purpose of emission unit description:

- **Cleaning operations:** Cleaning operations include all hand-wipe cleaning operations, each spray gun cleaning operation, and all flush cleaning operations.
- **Primer and topcoat application operations:** These operations emit VOC and organic and inorganic HAPs from primer and topcoat applications. 40 CFR 63 Subpart GG specifically defines priming and topcoating to be separate and distinct coating operations for which compliance determinations are performed separately; however, since primer and topcoat spray coating operations occur in the same booths, the operations are combined here for convenience. This process includes all painting, both NESHAP-regulated and non-NESHAP regulated, that occurs in the paint booths and hangars throughout the NASWI facility. Painting includes priming, finishing, and touch up. Specific paint booths are listed below.
 - **BTH-2547-02** and **BTH-2547-03** are water wall paint booths located at Fleet Readiness Center-Northwest (FRC-NW) 51B. They were installed in 1985 and are typically used for painting wheels, aircraft parts, and other miscellaneous parts.
 - **BTH-2818-01** is a dry filter paint booth that was built in 1976 and was relocated to the FRC Composite Shop (building 2818) in 2005. It is typically used for painting non-structural "pods" and other aerospace parts
 - There are small booths used for paint mixing and for painting with aerosol cans in the **hangars**. Paint handling and housekeeping within these small booths are subject to the area coating and cleaning provisions of the Aerospace NESHAP, as is the open area of each hangar.
- **Depainting operations:** Depainting is defined by the NESHAP as removal of permanent coatings from the outer surface of an aerospace vehicle or component and includes washing, use of chemical agents and media blasting. 40 CFR 63.746(a) states that the depainting requirements of the Aerospace NESHAP don't apply to facilities that depaint 6 or less completed aerospace vehicles per year. NASWI does not depaint entire aircraft. Therefore, the depainting requirements of 40 CFR 63.746 don't apply and are not listed in the AOP.

- **Chemical milling maskant application operations:** At the time of issuance of this AOP renewal, NASWI does not conduct chemical milling maskant application operations. Therefore, chemical milling maskant application is not listed in the AOP.
- **Handling and Storage of Waste:** VOC and organic HAP emissions from wastes must be minimized by conducting handling and transfer activities in such a manner as to minimize spills.

Paint stripping operations (not subject to aerospace NESHAP):

RBL-PP995-01 was located at 900 Division. This metal-shot blasting booth was permitted under Order of Approval 755a. The blasting booth was used for ground support equipment. **RBL-PP995-01** was replaced by **RBL-0995-02**. No permit (OAC) was required for **RBL-PP995-02**. Since the unit has been removed, the conditions of OAC 755a that pertain to **RBL-PP995-01** are not included in the AOP.

The base has several existing glove box blasters that are less than 200 cubic feet in size. Their size limits their use to "parts or units normally removed from the aerospace vehicle for depainting"; therefore, the glove box blasters are exempt from the depainting standards established in the Aerospace NESHAP. However, generally applicable nuisance and fugitive standards still apply.

Two new glove-box blasters, **BBL-2547-08** and **BBL-2547-09**, using glass and plastic bead media, were installed in 2013. Similarly to the glove-box blasters discussed above, these units are used for parts or units normally removed from the aerospace vehicle for depainting. Therefore, they are exempt from the depainting standards of the Aerospace NESHAP. The blasters vent indoors through filters. Because they vent indoors, OACs were not required. Similarly glove-box blasters BBL-2547-03, 04, 05, 06, and 07, these units are considered IEUs because of their low emissions (see Section 6.)

Other Operations at NASWI That Are Not Subject to the Aerospace NESHAP

A powder coating operation was installed in 2013 at 900 Division in building 995. Powder coating booth **PCB-PP995-02** replaced **PCB-PP995-01** which was previously in this location. An OAC was not required as the booth vents indoors and is not subject to the Aerospace NESHAP. The powder coating booth is equipped with dry exhaust filters. Parts processed in the booth are cured in the existing natural gas curing oven **FRN-PP995-01**. The building also contains an existing, natural gas, controlled pyrolysis cleaning furnace (**FRN-PP995-02**).

Additional painting operations that are not subject to the Aerospace NESHAP occur at the Seaplane Base in paint spray booth **BTH-0018-01**. This booth is a dry filter paint booth located at the Base Operating Support Contractor's Transportation Maintenance Building 18 at the Seaplane Base. Cars, light-, medium- and heavy-duty trucks and other special-purpose Navy civil

engineering support equipment are painted in this booth. Vehicle painting is typically performed as part of collision or corrosion repairs. Waste collection dumpsters are also repaired and painted in this booth. The booth was installed in 2011.

NASWI operates two 2,500 gallon stripping tanks, **STR-2547-01** and **STR-2547-02**. The tanks are located at building 25-47 in area 51B. These tanks were installed in the 1990s and use an n-methyl-2-pyrrolidone (NMP) based solvent. Aerospace parts are removed from aircraft, placed in baskets, and submerged in the stripping solution. Because the parts have been removed from the aircraft, the depainting requirements of the aerospace NESHAP don't apply and the units are not subject to the NESHAP.

NASWI operates one 1,000 gallon degreasing tank, which uses a non-chlorinated degreasing fluid per MIL-PRF-680 (Stoddard solvent). This tank was installed before 2009. Only parts removed from aircraft are degreased. The aerospace NESHAP doesn't apply.

Gasoline Dispensing Stations

There are two gasoline dispensing stations at Ault Field – the Naval Exchange (NEX) AutoPort station and the government fleet station – and one NEX gasoline dispensing station at the Seaplane Base. Fuel dispensing into vehicles, to and from storage tanks, and the above- and underground storage tanks themselves comprise this set of emission units. Gasoline storage tanks included in the NASWI AOP are listed below.

- Ault Field NEX gasoline dispensing station storage tanks:
 - **GAS-2595-01, -02, and -03** 20,000-gallon unleaded gasoline underground storage tanks equipped for stage I vapor recovery.
 - **AST-2595-08** 5,000-gallon E85 (85% ethanol, 15% gasoline) aboveground storage tank equipped for stage I vapor recovery.
- Ault Field government fleet gasoline dispensing station storage tanks:
 - **GAS-2622-01 and GAS-2623-01** The government fleet gasoline station's two 25,000-gallon motor vehicle gasoline tanks were installed in 1978 and are equipped for stage I vapor recovery.
- Seaplane Base NEX gasoline dispensing station storage tanks:
 - **AST-2813-01 and -02** 8,000-gallon unleaded gasoline aboveground storage tanks equipped for stage I vapor recovery.
 - **AST-2813-03** 12,000-gallon unleaded gasoline aboveground storage tank equipped for stage I vapor recovery.
 - **AST-2813-04** 10,000-gallon unleaded gasoline aboveground storage tank equipped for stage I vapor recovery.

Stationary Internal Combustion Engines

Engine Testing. The engine test cells and stands are used by the Aircraft Intermediate Maintenance Department (AIMD), which is part of the Fleet Readiness Center-Northwest (FRC-NW), to test and maintain aircraft engines.

- **ETC-2525-01** To perform aircraft engine repair and maintenance, the Ault Field base installed the T-6 jet engine test cell in 1962 to test A-6 Intruder engines and, later, EA-6B Prowler engines and J-52 engines (11,200 HP in size).
- **ETC-2765-01** NASWI installed the T-10 jet engine test cell in the mid-1990s to expand the facility's capacity to test aircraft engines.
- **ETC-2525-02** NASWI operates the T-17 outdoor test stand for T-56 turbo jet engines. The test stand is a metal support structure bolted to the ground that supports an engine. Engine start-up is managed through the use of a small, portable, generator know as a huffer. The stand is located next to the T-6 and T-10 engine test cell buildings. The test stand was replaced with a new stand in 2012.
- **ETC-2525-03** NASWI operates an outdoor test stand for auxiliary power units, approximately 85 HP in size.

Stationary internal combustion engines. Throughout Ault Field, Area 6, and the Seaplane Base, NASWI operates and maintains many stationary¹ diesel-fired compression ignition (CI) reciprocating internal combustion engines (RICE). There are also two natural gas-fired spark ignition engines. The majority of these engines drive emergency generators for back-up power to sewage lift stations, radar, communications, runway lighting, building power, water pumps and other base related activities and services. A wood chipper and a metal baler are driven by CI RICE and provide non-emergency service. Table 2- lists the stationary RICE at NASWI. The table includes the following information:

- Location – where the engine is located; SPB = Seaplane Base.
- Engine ID – internal combustion engine (ICE)/wood chipper (WOO)/metal baler (BAL) – four digit building ID – unit number.
- Generator Rating – for electrical generators, this column denotes the power output rating of the generator.
- Engine Rating – Regulation applicability is based on the engine's site-rated horsepower (hp), which is the maximum manufacturer's design capacity at

¹ 40 CFR 63.6675: *Stationary reciprocating internal combustion engine (RICE)* means any reciprocating internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

engine site conditions. The engine's power output rating is different from, and greater than, the associated generator's power output. Ratings listed in the column with no "+" are the actual engine hp ratings as listed on the engine itself or in engine documentation. A rating listed with a "+" indicates an engine output rating based solely on the conversion of the generator output in kW to engine output in hp; the actual engine rating must necessarily be larger than the indicated rating.

- Order Date – Regulation applicability may depend on the date that an engine was ordered by NASWI². Since many of the engines are older, the order date may be unknown or not very specific. Order dates in 2002 and 2006 are the most relevant for applicability determinations. For other years, the order date need not be as specific.
- Manufacture Date – This column contains the manufacture date of the engine as indicated on the engine nameplate. For some engines, only an installation date was available in the associated logbook; the installation date is then identified in this column.
- OAC – If an Order of Approval to Construct (OAC) has been issued for the engine, the OAC number is indicated in this column.
- Use – Engines are designated as either emergency or non-emergency. Engine-generators used to provide emergency backup power that operate in anticipation of a power outage (for example, when the wind blows strongly) still qualify as "emergency" since some of the operations at the base are highly sensitive in nature and, due to safety and security concerns, cannot afford to lose power at all. These critical activities are primarily associated with the flight line landing/take-off lights and radar and communications. The engine-generators are put online when conditions indicate a likelihood of a power outage; as such, the engines are still functioning to provide emergency/backup power, but are set to be much more responsive due to the nature of their service. When conditions are calm and there are no indications of power interruption, the engines are not used. At the time of the AOP issuance, there are only two stationary non-emergency engines at NASWI: the metal baler and the wood chipper.

All but two of the engines are diesel-fired compression ignition engines. The two spark ignition natural gas-fired engines are indicated in the Engine Rating column by "natural gas fuel".

² 40 CFR 63.2: *Commenced* means, with respect to construction or reconstruction of an affected source, that an owner or operator has undertaken a continuous program of construction or reconstruction or that an owner or operator has entered into a contractual obligation to undertake and complete, within a reasonable time, a continuous program of construction or reconstruction.

Table 2-2 Stationary Internal Combustion Engines at NASWI

Location	Engine ID	Generator Rating	Engine Rating	Order Date	Manufacture Date	OAC	Use
SPB fire station	ICE-0016-01	35 kW	62 hp	Unknown	12/1/1998		Emergency
Elmer site/Saratoga Heights base housing water tower	ICE-0087-01	95 kW	128+ hp <i>natural gas fuel</i>	Unknown	2001		Emergency
Water treatment plant	ICE-0198-02	350 kW	600 hp	1997	6/1998	642	Emergency
Dog Kennel Bldg.	ICE-2815-01	100 kW	135+ hp	Unknown	12/2001		Emergency
SPB sewer lift station	ICE-0312-02	100 kW	135+ hp	Unknown	4/2011		Emergency
Airport terminal- vault a, behind heating plant	ICE-0368-01	75 kW	101+ hp	Unknown	Installed 6/17/1993		Emergency (operated during conditions that are likely to cause power interruption)
Galley	ICE-0382-01	350 kW	470+ hp	1995	1995 or earlier	551	Emergency
Building 384, Ault Field	ICE-0384-03	300 kW	402 hp	2013	2013		Emergency

Table 2-2 Stationary Internal Combustion Engines at NASWI

Location	Engine ID	Generator Rating	Engine Rating	Order Date	Manufacture Date	OAC	Use
Admin/ operations/ radar center	ICE-0385-03	300 kW	402 hp	1997	1997- installed 10/1997; motor rebuilt in '04 per logbook	624	Emergency (operated during conditions that are likely to cause power interruption)
Hangar 5	ICE-0386-03	250 kW	399 hp	6/7/2007	10/01/2008		Emergency
Hangar 6 fenceline	ICE-0410-01	25 kW	34+ hp	2003	11/20/2003		Emergency
Wastewater treatment plant headworks "fly lift"	ICE-0420-02	125 kW	168+ hp	2002	installed 10/2002		Emergency
Ault Field sewer lift station	ICE-0421-02	60 kW	93 hp	Unknown	12/02/1998		Emergency
Weapons/ ordnance	ICE-0423-02	26 kW (20 kW)	35+ hp	2002	12/2001		Emergency
Weapons bunker	ICE-0430-02	15 kW	27 hp	2002	12/2001		Emergency

Table 2-2 Stationary Internal Combustion Engines at NASWI

Location	Engine ID	Generator Rating	Engine Rating	Order Date	Manufacture Date	OAC	Use
Flight line uhf/vhf receiver	ICE-0856-02	35 kW	68 hp	1996	8/26/1996		Emergency (operated during conditions that are likely to cause power interruption)
Racon Hill (Buildings' backup)	ICE-0858-02	150 kW	277 hp	1996	8/14/1996		Emergency (operated during conditions that are likely to cause power interruption)
SPB sewer lift station	ICE-0870-02	50 kW	67+ hp	Unknown	9/2010		Emergency
(flight line?) uhf/vhf transmitters	ICE-0874-02	50 kW	102 hp	1996	8/19/1996		Emergency (operated during conditions that are likely to cause power interruption)
Runway lighting vault b	ICE-0889-02	300 kW	479 hp	1996	6/1996		Emergency (operated during conditions that are likely to cause power interruption)
SPB Fuels	ICE-0892-01	150 kW	238 hp	Unknown	12/02/2009		Emergency
PAR site (radar)	ICE-0894-02	50 kW-47 kW @ 3 phase	81 hp	2009	3/2009		Emergency

Table 2-2 Stationary Internal Combustion Engines at NASWI

Location	Engine ID	Generator Rating	Engine Rating	Order Date	Manufacture Date	OAC	Use
Telephone exchange	ICE-0975-01	100 kW	134+ hp	Before 11/2002	2002		Emergency
Naval aviation tech training unit (CNATTU)	ICE-0976-02	300 kW	686 hp	7/2009	6/2008		Emergency
Hospital	ICE-0993-01	100 kW	166 hp	1996	1/3/1996		Emergency
Hospital	ICE-0993-02	455 kW	676 hp	1991	1991	551	Emergency
Security police	ICE-0994-01	350 kW	547 hp	7/29/2010	2009		Emergency
Tactical support center communications (out by golf course)	ICE-0135-03	200 kW	295 hp	10/21/2006	12/21/06	993	Emergency
Hangar 7	ICE-2544-04	7.5 kW	10 hp	Unknown	Prior to 2006		Emergency
Hangar 7-fire	ICE-2544-03	80 kW	131 hp	5/4/2009	02/2010		Emergency
Recycle compost facility – Area 6	WOO-2555-02	Set at 354 kW; as high as 535 kW	Engine setting: 475 hp; as high as 717 hp	Unknown	11/2009, installed 12/10	1100	Non-emergency Rotochopper wood chipper – 15.2 l/cyl displacement

Table 2-2 Stationary Internal Combustion Engines at NASWI

Location	Engine ID	Generator Rating	Engine Rating	Order Date	Manufacture Date	OAC	Use
Recycle Center	BAL-2555-01	--	80 hp	Unknown	1996	593	Non-emergency metal baler
Flight line: "hard stand" auto landing gear, 'acls h/s'	ICE-2577-01	60 kW	81+ hp	Unknown	1995		Emergency (operated during conditions that are likely to cause power interruption)
Start of flight line fence line: lights, turnstiles	ICE-2581-01	15 kW	20+ hp	2003	11/14/03		Emergency
Radio tacan	ICE-2596-02	50 kW	102 hp	1996	8/27/96		Emergency (operated during conditions that are likely to cause power interruption)
Wastewater treatment plant	ICE-2796-01	250 kW	336+ hp	7/1996	1996	583	Emergency
Simard Hall – SPB Museum (SPB Building 12)	ICE-2629-02	17 kW	23+ hp <i>natural gas fuel</i>	Unknown	7/20/99		Emergency
Hangar 8 fence line	ICE-2642-01	15 kW	20+ hp	2003	11/20/03		Emergency

Table 2-2 Stationary Internal Combustion Engines at NASWI

Location	Engine ID	Generator Rating	Engine Rating	Order Date	Manufacture Date	OAC	Use
Hangar 7 lift station	ICE-2645-02	10 kW	13+ hp	2009	Week 30/2009 installed 7/09		Emergency
Hangar 9 fence line	ICE-2681-01	15 kW	20+ hp	2003	11/19/03		Emergency
Hangar 10 fence line	ICE-2699-01	25 kW	34+ hp	2003	11/20/2003		Emergency
Naval ocean processing facility	ICE-2700-05	1000 kW	1502 hp	3/19/2008	2007		Emergency
Naval ocean processing facility	ICE-2700-06	1000 kW	1502 hp	3/19/2008	2007		Emergency
Liquid oxygen 'lox' fence line	ICE-2707-01	20 kW	27+ hp	2003	11/20/2003		Emergency
SPB Commissary	ICE-2742-01	55 kW	74+ hp	Unknown	3/2003		Emergency
Tactical support center	ICE-2772-01 (located in 2772, powers 2771)	500 kW	750 hp	9/2/1994	8/1995	528a	Emergency (operated during conditions that are likely to cause power interruption)

Table 2-2 Stationary Internal Combustion Engines at NASWI

Location	Engine ID	Generator Rating	Engine Rating	Order Date	Manufacture Date	OAC	Use
Tactical support center	ICE-2772-02 (located in 2772, powers 2771)	500 kW	750 hp	9/2/1994	8/1995	528a	Emergency (operated during conditions that are likely to cause power interruption)
P3 support facility	ICE-2836-01	150 kW –engine	252 hp	2002	10/7/2002		Emergency
Langley gate	ICE-2853-01	60 kW	81+ hp	2003	12/5/2003		Emergency
Control tower	ICE-2873-01	150 kW	202+ hp	9/26/2002	2003		Emergency
Racon Hill – radar dish	ICE-2878-01	135 kW	211 hp	2002	5/2002		Emergency
Elmer site/Saratoga Heights base housing fire dispatch	ICE-2883-01	50 kW	67+ hp	2004	9/3/2004		Emergency
Charles Porter gate	ICE-2864-01	40 kW	54+ hp	2003	12/5/2003		Emergency
Fire house, 'crash house'	ICE-2897-01	230 kW	309+ hp	2006	4/2006		Emergency
Aircraft wash rack	ICE-2903-01	40 kW	81 hp	2009	10/2009		Emergency

Table 2-2 Stationary Internal Combustion Engines at NASWI

Location	Engine ID	Generator Rating	Engine Rating	Order Date	Manufacture Date	OAC	Use
Consolidated fueling facility- near Bldg. 2911	ICE-2928-01	275 kW	418 hp	2009	12/9/2009		Emergency
Cliffside Park – tent area (lift station backup)	ICE-2965-01	50 kW	81 hp	Unknown	12/2011		Emergency
Airport terminal	ICE-0368-02	500 kW	671 hp	2014	2014		Emergency

Fire Training Facility

Navy personnel are trained in firefighting techniques at NASWI. The original fire training facility was located along the North boundary fence. Since the prevailing winds are from the South, the smoke impacted the neighboring residents. The fire training facility was relocated in 1980 to a more remote location.

In 1994, NASWI initiated construction of a new fire training facility. A letter dated February 9, 1994 from the NWCAA clarified that an Order of Approval was not required for the construction. Construction on the fire training facility was completed in 1997.

In the past, NWCAA issued fire permits to NASWI for fire training on the site. As of March 1998, the underlying statute of the Washington Clean Air Act under which the outdoor fire permit program is regulated (RCW 70.94.650) was revised to exempt aircraft crash rescue fire training from permit requirements. Therefore, there are no specifically applicable requirements for the fire training facility. The Fire Training Facility is an insignificant emission unit (IEU) per WAC 173-401-530(1)(d) (see Table 6-1 of this Statement of Basis), although generally applicable requirements still apply.

Open-burning of JP-5/8 jet fuel was eliminated and replaced by a propane-fired mobile training device in 2007.

Ozone Depleting Compound (ODC) Equipment

NASWI uses chillers that contain chlorofluorocarbons for cold storage, refrigerators, and air conditioning equipment. Refrigerant extraction equipment is required to be used when servicing, repairing, or disposing of equipment that contains ODCs.

Asbestos

Asbestos-containing construction materials were used onsite; when demolition of these structures occurs, asbestos handling requirements apply. NASWI must file a notice of intent (NOI) with NWCAA before disturbing any asbestos-containing material.

Explosive Ordnance Demolition Unit

The NASWI Seaplane Base hosts the Explosive Ordnance Demolition Unit Northwest which provides emergency recovery and render-safe demolition of previously-discharged marine markers and other unplanned ordnance. Demolitions occur within an enclosed ammunition disposal trailer specifically designed for this purpose. Such a unit is sometimes referred to as a popping furnace. From 1994-2012, an Outdoor Fire Permit issued by NWCAA provided for the outdoor burning of these otherwise prohibited materials. Each calendar year, NASWI filed for a new outdoor burning permit to operate the disposal trailer according to NWCAA Regulation 502.

The Washington State incinerator rule (WAC 173-434) does not apply to the ammunition disposal trailer because the unit is not designed to burn twelve or more tons per day of solid waste.

The military ammunition and unexploded ordnance (UXO) that are processed in the disposal trailer are not classified as a solid waste under the Resource Conservation and Recovery Act (RCRA) according to 40 CFR 266 Subpart M. 40 CFR 266.202(a)(1)(ii) & (iii) establishes that a military munition is not a solid waste when it is used for its intended purpose, including use in training military personnel or explosives and munitions emergency response specialists (including training in proper destruction of unused propellant or other munitions), or recovery, collection, and on-range destruction of unexploded ordnance and munitions fragments during range clearance activities at active or inactive ranges.

Explosive Ordnance Disposal (EOD) personnel at SPB are trained on handling and destroying UXO that may be generated at NASWI or at other DOD facilities. As part of the training, EOD personnel receive instruction on the proper and safe operation of the ammunition disposal trailer while burning UXO. In some instances the EOD personnel may be required to respond to explosives and munitions emergencies. The Military Munitions Rule (40 CFR 266.204) exempts persons responding to such emergencies from the RCRA generator, transporter, or permit requirements. Therefore, since the trailer is used for training and emergency munitions disposal, the trailer is not subject to permitting requirements under RCRA. Section 0 below discusses applicability of the New Source Performance Standard for Other Solid Waste Incinerators rule to the disposal trailer.

Odors and Other Nuisance Emissions

NWCAA occasionally receives complaints from the public regarding jet fuel odors and suspected fuel dumping from jet aircraft. NWCAA encourages the public to contact the agency and the NASWI complaint hotline to report odors, fugitive dusts, or other nuisance air contaminants that likely originate from NASWI. Anyone impacted by air emissions related to NASWI activities at home, school, or work should contact NWCAA at (360) 428-1617 and the NASWI complaint hotline at (360) 257-2681.

Insignificant Emission Units

Some emission sources located at the facility are categorized as insignificant since they meet the criteria listed in Washington Administrative Code (WAC) 173-401-530, -532 or -533. These emission sources are described in Section 6 of this Statement of Basis.

Equipment Permanently Shutdown

Table lists emission units at NASWI that have been permanently shutdown according to NWCAA regulation 325 since the previous AOP issuance. Some details on two pieces of recently shut down equipment follow.

Table 2-3 Equipment Permanently Shutdown at NASWI

Equipment ID	Description	Associated OAC†	Effective Date of Shutdown
BTH-2547-01	Paint booth	None	2005
BTH-2547-04	Paint booth	OAC 422b	10/2011
RBL-2547-01	Blast booth	OAC 266	2005
BTH-2801-01	Paint booth	OAC 723a	2007
RBL-2801-01	Blast booth	OAC 723a	2005
ICE-2700-01	Emergency generator	OAC 551	2009
ICE-2700-02	Emergency generator	OAC 551	2009
ICE-2700-03	Emergency generator	OAC 551	2007
ICE-2700-04	Emergency generator	OAC 551	2005
WOO-2555-01	Wood chipper	OAC 586	7/2012
ICE-0384-02	Emergency generator	OAC 624	2014
ICE-0385-02	Emergency generator	OAC 624	2014
ICE-2544-01	Emergency Generator		2014
BTH-PP995-01	Paint booth	OAC 755a	2013

† OAC 551 includes provisions for other emergency generators still in operation at the facility. The other OACs listed are no longer included in the Air Operating Permit.

BTH-2547-04 was a dry filter paint booth that was installed at FRC-NW 51B in 1993. In the past, the spray booth was used for painting wheels, aircraft parts, and other miscellaneous parts. In February 2012, NASWI received a Notice of Violation for using primers specifically prohibited by permit in this spray booth. In order to address the noncompliance, NASWI ceased spray coating activities in the booth in October 2011.

BTH-2801-01 was a dry filter paint booth installed in 2000 at the Ground Support Equipment Shop. It was used for painting ground support and aerospace equipment. The booth was decommissioned as a paint booth and has been converted to a robotic arm-operated UV-cure powder coating booth.

Emissions Inventory

The facility qualifies as a major source subject to the requirements of the Clean Air Act (CAA) Title V program because it has the potential to emit more than 100 tons per year of NO_x, SO₂, CO, and VOC and greater than 25 tons per year of combined HAPs. The primary sources of emissions are the three heating plant boilers,

cleaning and spray coating of aerospace vehicles, and reciprocating internal combustion engines.

Table and Table 2-5 below show the recent emissions history of the facility as identified in the annual emissions inventory submitted to NWCAA for the five year period from 2007 through 2011. Table lists the criteria pollutant emissions in tons per year, and Table 2-5 lists the toxic pollutant emissions in pounds per year.

Table 2-4 Criteria Pollutant Emissions Inventory, tons per year

Pollutant, ton/yr	2007	2008	2009	2010	2011
Total suspended particles (TSP)	59	57	56	56	23
PM ₁₀	23	21	21	21	17
PM _{2.5}	16	14	14	13	17
SO ₂	0	0	0	0	1
CO	18	16	14	14	10
NO _x	16	14	12	12	8
VOC	12	9	16	14	43
CO ₂	NR ³	NR	12,577	12,270	17,574
CH ₄ (CO ₂ e ⁴ = tons CH ₄ *21)	NR	NR	NR	0.2425 (5.1)	0.4 (8.4)
N ₂ O (CO ₂ e = tons N ₂ O*310)	NR	NR	NR	0.076 (23.6)	0
Total CO ₂ equivalents	NR	NR	12,577	12,298.7	17,582.4

Table 2-5 Toxic Pollutant Emissions Inventory, pounds per year

Pollutant, lb/yr	2007	2008	2009	2010	2011
1,1,1-trichloroethane	2007	0	NR	NR	NR

³ Not reported.

⁴ Carbon dioxide equivalents (CO₂e) are equal to the tons of greenhouse gas times the Global Warming Potential as listed in Table A-1 of WAC 173-441-040(2).

Table 2-5 Toxic Pollutant Emissions Inventory, pounds per year

Pollutant, lb/yr	2007	2008	2009	2010	2011
1,3 Butadiene	98	85	77	61	46
2-pentanone (MPK)	549	332	342	252	785
Acetaldehyde	252	219	197	158	117
Acrolein	124	109	98	78	58
Ammonia	28	752	NR	NR	NR
Arsenic	81	70	63	50	38
Benzene	142	128	137	128	118
Cadmium	8	7	7	5	4
Chromium	81	70	63	50	38
Cyclohexane	8	5	8	8	9
Ethylbenzene	42	23	45	42	47
Formaldehyde	817	711	639	518	389
Glycol ethers	965	500	8	5	523
Hexamethylene diisocyanate	3	2	1	1	0
Lead compounds	84	73	66	53	39
Methyl ethyl ketone	282	148	588	464	952
Methyl isobutyl ketone	399	183	292	341	294
Methylene chloride	458	398	266	401	161
Naphthalene	31	27	24	19	14
n-Hexane	305	238	59	78	82
Phenol	218	184	130	95	89
Propylene	484	414	364	329	227
Selenium	8	7	7	5	4

Table 2-5 Toxic Pollutant Emissions Inventory, pounds per year

Pollutant, lb/yr	2007	2008	2009	2010	2011
Strontium chromate	136	68	68	32	827 ⁵
Styrene	21	18	16	13	10
Toluene	505	284	751	918	887
Xylenes (Mixed Isomers)	273	266	411	303	156

Permitting History

Over the years, NWCAA has issued Orders of Approval to Construct (OAC) to NASWI for specific equipment. An OAC is issued under the authority of Section 300 of the NWCAA Regulations and is initiated by a Notice of Construction application submitted by the facility for a new source of emissions. After the NWCAA conducts a new source review, an OAC is issued by NWCAA that identifies the controls and restrictions that must be applied to the new source. These control requirements and restrictions are included as federally enforceable (described later in Section 0) permit terms in Section 5 – Specifically Applicable Requirements of the AOP.

Details of the OACs issued to NASWI are provided below. Additional information can be found at www.nwcleanair.org on the Air Quality Programs/Air Operating Permits page under the Naval Air Station Whidbey Island “Orders” link.

OAC (9/13/1984) – 59.65 MMBtu/hr boiler BOI-0384-04. NASWI was issued an OAC for installation of a boiler at the Heating Plant on September 13, 1984. The OAC required notification of startup but established no ongoing requirements or limits; therefore, this OAC does not appear in the AOP. The original application for approval to construct and the OAC (9/13/1984) itself list this boiler at 49 MMBtu/hr. However, during this AOP renewal and in anticipation of the finalized boiler MACT, information on the boilers at NASWI was documented by boiler operation and maintenance personnel per NWCAA request. The resulting information showed BOI-0384-04 at 59.65 MMBtu/hr, which is the natural gas heat input rating listed in its operation and maintenance (O&M) manual. The O&M manual also lists a 57.5 MMBtu/hr JP-8 fuel oil heat input. The application for approval to construct for the two newest heating plant boilers (BOI-0384-06 & -07, discussed below under OAC 594) in the internal NWCAA “NOC #594” file showed a natural gas heat input rating of 57.8 MMBtu/hr for BOI-0384-04. The application also showed that this boiler is

⁵ The method of reporting strontium chromate changed in 2011; therefore, the amount of chromate-containing material emitted was estimated to be much higher than previous years.

expected to produce 49,000 pounds per hour of steam; this may explain the misstated "49 MMBtu/hr" listed in the OAC and application. Since "MMBtu/hr heat input" is the parameter used to establish regulatory applicability, 59.65 MMBtu/hr is the listed rating of this boiler in the AOP.

OAC 243 – 8.369 MMBtu/hr boiler BOI-0993-01. The OAC dated April 18, 1988 establishes opacity and particulate emission limits as well as fuel sulfur limits for a boiler installed at the Ault Field Hospital. The OAC limits the boiler to burning natural gas or #2 fuel oil. The NWCAA was notified of complete installation in a letter dated December 28, 1989.

OAC 260 – T-10 engine test cell ETC-2765-01. The OAC was issued on November 16, 1989 for construction of a new engine test cell. Estimated project emissions in the permit application were based on a maximum of 825 testing hours per year. (There seems to be a typo under the "Air Emission/Ambient Impacts" section of the board report/OAC that states emissions are based on 835 testing hours per year; however, other references to time limits suggest emissions were based on 825 testing hours). This maximum has been added as a directly enforceable permit condition (described later in Section 0) in Section 5 of the AOP. The application also assumed combustion of "low sulfur" fuel in the engines, and, at the time of permit issuance, 0.5 wt% fuel sulfur was considered "low sulfur". Fuel specifications for either of the two aviation fuel types that could be used by the engines, JP-5 or JP-8, are 0.40 wt% and 0.30 wt%, respectively. Therefore, a fuel sulfur limit was not added as a permit condition.

OAC 528a – Emergency electrical generators ICE-2772-01 and -02. This project involved installation of two new emergency electrical generators. The original OAC was issued on March 29, 1995 to cover one generator. Modification No. 528a was issued on March 4, 1996 for two identical generators. The permit limits visible emissions to 10% for three minutes in one hour, diesel fuel sulfur content to ≤ 0.05 wt%, and a maximum annual operating limit of 4000 hours. The NWCAA was notified of complete installation in a letter dated February 20, 1996.

OAC 551 – Emergency electrical generators ICE-0382-01 and ICE-0993-02. This project involved installation of nine diesel-powered emergency electrical generators. The OAC was issued on May 1, 1995. The OAC limits fuel sulfur to ≤ 0.05 wt %, opacity to $< 10\%$, and limits hours of operation. Originally this OAC covered nine engines: ICE-0382-01, ICE-0385-01, ICE-0976-01, ICE-0993-02, ICE-2508-02, and ICE-2700-01 through -04. Engines ICE-0385-01, ICE-0976-01, ICE-2508-02, and ICE-2700-01 through -04 have been permanently shut down; therefore, the OAC covers the two remaining engines, ICE-0382-01 and ICE-0993-02.

OAC 583 – Emergency electrical generator ICE-2614-01. The OAC was issued on April 11, 1996 for installation of one 250 kW diesel-powered emergency electrical generator to provide backup power to the wastewater treatment plant. Conditions in the OAC limit fuel sulfur content, opacity, and hours of operation.

OAC 593 – Metal baler BAL-2555-01. This OAC was issued on June 24, 1996 for installation of a diesel-fired metal baler. OAC 593 limits engine fuel sulfur content and opacity from the metal baler engine.

OAC 594 – 54.8 MMBtu/hr boilers BOI-0384-06 and -07. This OAC was issued on November 27, 1996 for two natural gas-fired steam boilers that were installed at the Ault Field heating plant. Each boiler is rated at 54.8 MMBtu/hr natural gas heat input and 53.5 MMBtu/hr JP-8 fuel oil heat input. JP-8 is used as backup fuel in the boilers; the permit limits JP-8 sulfur content to 0.3 wt% or less and the volume of backup fuel that can be burned on a rolling 12-month basis. The OAC limits nitrogen oxide emissions according to fuel type and visible emissions to 5% opacity except as allowed for grate cleaning. The OAC also notes that the boilers are subject to 40 CFR 60 Subpart Dc, which is described further in Section 0 of this Statement of Basis. In previous versions of the NASWI AOP and Statement of Basis, the heat input rating of these boilers was listed as 53.1 MMBtu/hr.

OAC 624 – Emergency electrical generators ICE-0384-02 and ICE-0385-02. OAC 624 was issued on July 14, 1997 to allow installation of two 500 kW diesel-powered emergency electrical generators, ICE-0384-02 and ICE-0385-02. The Order limited hours of operation, opacity, and sulfur content of fuel burned. Both engines were removed from NASWI in 2013. They were replaced by emergency generators that did not require permit (OACs). Therefore, since ICE-0384-02 and ICE-0385-02 are no longer at NASWI, OAC 624 is obsolete and was removed from the AOP during the 2015 AOP revision.

OAC 642 – Emergency electrical generator ICE-0198-02. OAC 642 was issued on January 6, 1998 to allow installation of a 350 kW diesel-powered emergency electrical generator. The Order limits hours of operation, visible emissions, and sulfur content of fuel burned.

OAC 644a – Ault Field Naval Exchange gasoline station. “Stage II” equipment at a gasoline station recovers gasoline vapors during fuel transfer from a storage tank to a motor vehicle. In December 1997, a revision of Chapter 173-491 Washington Administrative Code (WAC), which regulates gasoline-marketing operations, exempted smaller gasoline stations in Island County (among others) from stage II requirements, provided that a Notice of Construction application to remove stage II equipment was submitted. An application to that effect was submitted for both the Ault Field NEX and the government fleet gasoline stations (OAC 646, below) on January 12, 1998. Order of Approval to Construct No. 644, covering stage II removal at the Ault Field NEX gasoline station, was issued on January 24, 1998.

On October 29, 2009, OAC 644a was issued for the Ault Field NEX gasoline station to allow construction of an aboveground 5,000-gallon “E85” storage tank, which stores fuel that is 85% ethanol, 15% gasoline. The Ault Field Navy Exchange gasoline station is required to maintain stage I vapor recovery on all gasoline storage tanks, which means fuel vapors must be captured during fuel transfer from

the delivery truck to the fuel storage tanks. Tank pressure testing is also required on the E85 storage tank.

OAC 646 – Government fleet gasoline station. An order of approval, OAC 450b, was issued for the Ault Field government fleet gasoline station on October 5, 1993. OAC 646 was issued on January 24, 1998 and superseded OAC 450b. OAC 646 establishes requirements for the stage I vapor recovery system on the two underground gasoline storage tanks (Tank IDs 2622-01 and 2623-01) at the government fleet gasoline station. The gasoline is not sold or marketed and, therefore, may not be directly regulated by WAC 173-491. However, OAC 646 requires that “stage I equipment shall be continuously maintained and operated ... in accordance with state and local rules as defined in WAC 173-491 and NWCAA section 580.” The continuing requirements of this Order are included in Section 5 of the AOP.

OAC 755a – powder coating spray booth BTH-PP995-01, powder coating curing oven FRN-PP995-01, and controlled pyrolysis cleaning furnace FRN-PP995-02. The original OAC issued on March 8, 2001 for this project permitted installation of a powder coating booth, a blast booth, a curing oven, and a pyrolysis cleaning furnace. The permitted equipment was to be used to prepare and paint ground support equipment only. Revision OAC 755a was issued on January 30, 2004 to allow powder coating activities to occur on aerospace equipment in these emission units. This permit contains provisions relevant to traditional painting activities; however, this collection of equipment is used for powder coating. Parts subject to the Aerospace NESHAP are specifically not allowed to be blasted in the blast booth.

In 2013 BTH-PP995-01 was replaced by BTH-PP995-02. BTH-PP995-02 is an indoor venting powder coating booth that’s used for ground support equipment. The booth is not subject to the requirements of the Aerospace NESHAP.

OAC 987 – Infrared Heaters for Hangars 6, 8, and 10. NASWI replaced steam forced air heating systems in Hangars 6, 8, and 10 (buildings 410, 2642, and 2699, respectively) with infrared radiant heating units in 2006. The infrared heaters are fueled by natural gas. Total project aggregate heat input was 9.8 MMBtu/hr, which is below the 10 MMBtu/hr natural gas heat input permitting threshold, but NOx emissions exceeded the permitting threshold of 2.0 tons per year. OAC 987 limits opacity to 5% or less and requires that only natural gas fuel be used in the infrared heaters.

OAC 993 – Emergency generator ICE-2508-03. ICE-2508-03 is a 200 kW diesel-fired emergency power generator that was installed in 2007 to replace two older emergency generators. According to OAC 993 documentation, the engine was manufactured prior to April 1, 2006; however, during the 2012 annual inspection, a visual inspection of the emergency generator showed a nameplate manufacture date of 12/21/06. The engine was classified according to the nameplate date for regulatory applicability in this AOP. The OAC requires that only ultra-low sulfur

diesel fuel (or an alternative biodiesel fuel upon approval) be used in the engine, that opacity not exceed 10%, and that the engine not operate more than 500 hours per year.

OAC 1021 – Boilers, hot water heaters, and infrared heaters for Hangar 5.

The total aggregate heat input of this hangar heating system upgrade was 11.57 MMBtu/hr, which triggered NSR. NASWI replaced the steam forced air heating in Hangar 5 with a natural gas-fired infrared radiant heating system. In addition, two small (2 MMBtu/hr) natural gas-fired boilers and 7 natural gas-fired hot water heaters were installed as part of the project. OAC 1021 limits visible emissions to no more than 5% opacity and only allows natural gas fuel to be used in the combustion units. NASWI is also required to maintain a list of the serial numbers of the equipment covered by OAC 1021; this facilitates the identification of the originally installed equipment.

OAC 1030 – Seaplane Base gasoline station. OAC 1030 was issued October 16, 2008 and superseded OAC 710. OAC 1030 allowed for the removal of stage II vapor recovery at the Seaplane Base gasoline station (as described above under OAC 644a) but maintained the original requirements for stage I vapor recovery. Stage II vapor recovery systems capture vapors generated during fuel transfer from a fuel storage tank to a vehicle. Stage II requirements for gasoline stations changed because the on-board refueling vapor recovery (ORVR) technology advanced in the vehicle fleet. For more information, please visit EPA's website:

<http://www.epa.gov/oms/regs/ld-hwy/onboard/orvrq-a.txt>

OAC 1081 – Paint spray booth BTH-0018-01. An automotive paint spray booth was installed at the Seaplane Base in 2011 to replace an existing automotive spray booth that was removed from service as part of the demolition of Building 49. OAC 1081 was issued on January 25, 2011 for the new booth and requires that the booth be equipped with filters that, at a minimum, meet the 98% capture efficiency set forth in 40 CFR 63 subpart HHHHHH (subpart 6H). OAC 1081 requires that the booth be fully enclosed, that painters complete training at least as stringent as the training required by subpart 6H, and that no coatings containing hexavalent chromium be used or stored onsite. The OAC also establishes other monitoring, recordkeeping and reporting requirements for the booth. This spray booth is used primarily to repair and maintain ground support equipment such as vehicles and dumpsters.

OAC 1100 – Wood chipper WOO-2555-02. During the June 29, 2011 site inspection of the NASWI facility, it was discovered that a new wood chipper had replaced the existing, permitted wood chipper. NASWI was issued NOV 3937 for failing to obtain an OAC prior to acquiring the new wood chipper. OAC 1100 was issued on September 9, 2011 and superseded the Order for the old wood chipper (OAC 586). At the time of this renewal, the old wood chipper had been removed from the facility. OAC 1100 establishes fuel sulfur and opacity limits for the wood chipper engine and requires work practices to control fugitive emissions in the vicinity of the wood chipper.

OAC 1131– Paint spray booth BTH-2818-01. BTH-2818-01 was built in 1976 and is currently located at the FRC Composite Shop. The booth was relocated to the Composite Shop (Building 2818) in 2005. It is used for painting non-structural "pods" and other aircraft parts. During the 2011 full compliance evaluation, a records review showed that aerospace NESHAP-regulated coatings were being used in the booth, but the booth was not equipped with a NESHAP-compliant filtration system. NASWI was issued NOV 3945 and Compliance Order 5 (CO 5), which required the facility to retrofit the booth with compliant filters by December 7, 2012. Since the booth was installed in 1976, the booth did not have any compliance requirements other than generally applicable and aerospace NESHAP requirements. However, the upgrade to the pollution control system (i.e., the filtration system) required by CO 5 triggered minor new source review of the booth. OAC 1131 was issued on August 20, 2012 and requires properly certified and installed filters. Further, OAC 1131 requires that a differential pressure gauge be installed across each of the three filter banks and that these pressure differential gauges be calibrated periodically if appropriate. Pressure differential readings are required to be logged each shift.

Compliance History

The Naval Air Station Whidbey Island was initially registered by the NWCAA on September 30, 1972.

Notice of Violation

NASWI is required to notify NWCAA if excess emissions are released to the atmosphere or if the facility deviates from AOP terms. NWCAA personnel also conduct annual site inspections to evaluate facility emissions, monitoring, recordkeeping, and reporting against AOP requirements. NWCAA then makes a determination as to whether there are any violations of AOP terms. If a violation is determined to have occurred, enforcement action may be taken. This may include issuance of a Notice of Violation (NOV), reporting in the Aerometric Information Retrieval System (AIRS) database, and possible listing with EPA Region 10 as a High Priority Violation (HPV). The source is then tracked until it returns to compliance.

NWCAA has issued eleven NOVs to NASWI since 1995. The NOVs are summarized in Table below. At the time of this permit issuance, there are no pending enforcement actions.

Table 2-6 Notices of Violation – Naval Air Station Whidbey Island

NOV	Date Issued	Description	Disposition
2530 (Warning)	August 8, 1995	NOV issued for exceeding the maximum allowable pressure differential across the particulate filters for paint spray booth BTH-2547-04.	Consent Order and Assurance of Discontinuance issued. Violation was resolved through training and compliance with the recording requirement.
2723A	April 7, 1997	Facility was cited for not abiding by an operating and reporting condition in an Order of Approval for paint spray booth BTH-2547-04. Specifically, manometer differential pressure readings were not logged on a daily basis for the days of booth operation.	Consent Order and Assurance of Discontinuance issued. Violation was resolved through training and compliance with the recording requirement.
3190	August 14, 2001	Violation issued for exceeding opacity limits (10%) on Emergency Electrical Generator ICE 2700-02 for more than 3 minutes in any hour.	Agreed to Consent Order and Assurance of Discontinuance. Facility to perform corrective maintenance and provide training.
3307	March 13, 2003	Facility cited for failure to use listed cleaning solvents or those that meet a vapor pressure of ≤ 45 mm Hg, or reduce volume used by 60% from approved baseline value.	Agreed to Consent Order to implement an Aerospace NESHAP material control system and, as a Supplemental Environmental Project, to install low-sulfur diesel storage and dispensing system.
3376 (Warning)	December 3, 2003	Failure to conduct visible emissions observations for emergency generators ICE-2700-01, -02, and -03 in January 2003 and emergency generator ICE-0385-02 during ten occasions of 24 hours of continuous operation.	None.
3375	December 15, 2003	Conventional (non-HVLP or high transfer efficiency) spray guns used at permitted unit. Under the facility's OAC #723 permit conditions, only HVLP or other high transfer efficiency application methods can be used in paint spray booth BTH-2801-01. Note: This is not a violation of the Aerospace NESHAP.	Consent Order and Assurance of Discontinuance issued. Facility implemented use of lower-VOC topcoats and retrained personnel.

Table 2-6 Notices of Violation – Naval Air Station Whidbey Island

NOV	Date Issued	Description	Disposition
3531 (Warning)	March 14, 2006	According to their semi-annual report, NASWI reported that visible emissions from emergency generator ICE-0993-02 were detected and monitored for 6 minutes. The observer who monitored emissions, however, was not certified as required by Ecology Method 9A.	None.
3566 (Warning)	December 20, 2006	Failure to submit Notice of Construction for combustion units at multi-site project.	Notice of Construction prepared and submitted.
3937	December 2, 2011	A new wood chipper was discovered at the NASWI facility during the June 29, 2011 site inspection. No Notice of Construction (NOC) had been filed for the wood chipper, and it had been in operation since December 2010. The new wood chipper replaced an existing wood chipper, which was permitted under OAC 586, dated April 11, 1996.	No penalty assessed due to NWCAA Board Resolution 320. NASWI applied for and received an Order of Approval to Construct for the new wood chipper.
3942	January 5, 2012	A pile of solvent-laden cleaning rags were left to "air out" on top of a sealed container, which is meant to contain such solvent-laden rags, at the Flying Club.	No penalty assessed due to NWCAA Board Resolution 320.
3945	February 15, 2012	Inorganic HAPs, in particular strontium chromate-containing primers, have been used in BTH-2547-04 (an existing source) and BTH-2818-01 (a new source) without the required high-efficiency filters installed on the spray booths.	Compliance Order signed by NASWI and NWCAA to upgrade BTH-2818-01 to meet the filter requirements per the Aerospace NESHAP December 7, 2012. BTH-2547-04 was permanently shut down in October 2011.

On March 11, 2004, the Board of Directors of the Northwest Clean Air Agency (formerly Northwest Air Pollution Authority or 'NWAPA') approved a resolution halting the imposition of monetary penalties against NASWI. The resolution is included here in its entirety:

BEFORE THE BOARD OF DIRECTORS OF THE NORTHWEST AIR POLLUTION
AUTHORITY

IMPOSITION OF MONETARY

PENALTIES AGAINST NAVAL AIR

RESOLUTION NO. 320

STATION WHIDBEY ISLAND

WHEREAS, the Northwest Air Pollution Authority (NWAPA) has the responsibility of enforcing clean air laws and regulations within the three county area of Island, Skagit and Whatcom Counties;

WHEREAS, the Naval Air Station (NAS), Whidbey Island, is located within NWAPA's jurisdiction;

WHEREAS, Naval Air Station, Whidbey Island, takes very seriously its obligations to maintain compliance with Federal, State and local environmental laws and regulations and to the extent that NAS Whidbey Island has violated the Clean Air Act it has a duty and obligation to correct the deficiencies expeditiously and in accordance with all applicable state laws;

WHEREAS, NWAPA generally imposes monetary penalties and other remedial corrective requirements against violators of the clean air laws and regulations that NWAPA enforces;

WHEREAS, the issue of whether Congress has waived the sovereign immunity of federal agencies from the payment of state and local monetary penalties is still in active litigation in various state and federal circuit courts;

WHEREAS, until resolved in the courts, neither Naval Air Station, Whidbey Island, Department of the Navy, nor the Department of Defense may waive sovereign immunity and pay monetary penalties to NWAPA;

WHEREAS, both NWAPA and NAS Whidbey Island expend costly and expensive time and resources dealing with issue whether NWAPA can legally impose and collect monetary penalties against NAS Whidbey Island;

WHEREAS, it is in the public's interest that NWAPA cease imposing monetary penalties against NAS Whidbey Island until the lawfulness of such action is finally determined in court;

NOW THEREFORE, IT IS HEREBY RESOLVED that NWAPA will continue to enforce the clean air laws and regulations involving NAS Whidbey Island but will cease imposition of monetary penalties against NAS Whidbey Island until the courts

finally determine that Congress has waived sovereign immunity to allow imposition and collection of such monetary penalties.

APPROVED by the Board of Directors of the Northwest Air Pollution Authority this 11th day of March 2004.

ATTEST: _____

Bob Jarski, Chair
NWAPA Board of Directors

Terry Nyman, Secretary
NWAPA Board of Directors

Compliance Reports

The NASWI AOP requires semiannual and annual reports to be submitted to the NWCAA as part of the facility's ongoing compliance demonstration. In addition, permit deviations must be reported within 30 days of the end of the month in which the deviation was discovered. Semiannual and annual reports submitted by NASWI are certified by the responsible official. Certification of the truth and accuracy of reported information by the responsible official is required at least semiannually. Annually, the responsible corporate official certifies compliance with all applicable requirements in the AOP term by term and whether the facility was fully or intermittently in compliance with each term.

3. BASIS OF REGULATION APPLICABILITY

40 CFR 60—New Source Performance Standards (NSPS)

40 CFR 60 Subpart A – General Provisions: The NSPS General Provisions apply to the owner or operator of a stationary source that contains an “affected facility”. Because the two 54.8 MMBtu/hr Heating Plant boilers at NASWI (BOI-0384-06 and -07) are subject to 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial Commercial Institutional Steam Generating Units and 17 engines at NASWI are subject to 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, these particular boilers and engines are affected facilities according to NSPS. Therefore, the General Provisions of 40 CFR 60 Subpart A apply to those units. NSPS Subpart A requirements are listed in Section 3 of the AOP as generally applicable to affected facilities.

40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: This standard applies to the two Heating Plant 54.8 MMBtu/hour package boilers, BOI-0384-06 and -07, since the boilers’ maximum design heat input is between 10 and 100 MMBtu/hr and

they were constructed after June 9, 1989. The boilers primarily combust natural gas and occasionally combust JP-8 fuel oil. JP-8 military jet fuel is primarily kerosene; therefore, Subpart Dc requirements and limits for the boilers are based on natural gas and distillate oil, which, according to the Subpart Dc definition, includes kerosene. Subpart Dc establishes standards, performance test methods, emissions monitoring, and recordkeeping and reporting requirements for sulfur dioxide and particulate matter emissions from the two boilers.

40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984: This regulation does not apply to the JP-8 (jet fuel) or diesel fuel storage tanks at NASWI because the vapor pressure of both the JP-8 and diesel fuels are below the 3.5 kPa (0.5 psia) applicability threshold⁶. In addition, the gasoline storage tanks located at the gasoline dispensing stations at Ault Field and the Seaplane Base are specifically exempted from Subpart Kb according to 40 CFR 60.110b(d)(6).

40 CFR 60 Subpart EEEE – Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006: The applicability of this regulation, often referred to as the "OSWI" rule, to the ammunition disposal trailer was reviewed. 40 CFR 60.2887(q) states that an incinerator used for national security is excluded from this subpart if the incineration unit is used solely during military training field exercises to destroy national security materials integral to the field exercises. NASWI uses the ammunition disposal trailer for training Explosive Ordnance Disposal (EOD) personnel and to destroy unexploded ordnance generated during ammunition training exercises. Therefore, the ammunition disposal trailer is not regulated under this subpart.

40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines: The provisions of Subpart IIII of 40 CFR 60 are applicable to manufacturers and operators of stationary compression ignition (CI) internal combustion engines (ICE). There are a number of factors used to determine applicability, including engine displacement, date of construction (date the engine was ordered) and whether or not the engine is a fire pump engine. NASWI has numerous stationary internal combustion engines throughout the facility that are primarily diesel-fueled compression ignition engines.

⁶ At 100 °F, the vapor pressure of distillate fuel oil No. 2 (diesel) is 0.022 pounds per square inch (EPA AP-42 Chapter 7, Table 7.1-2, November 2006), which is equivalent to a vapor pressure of 0.15 kPa. According to the JP-8 Material Safety Data Sheet, the vapor pressure of JP-8 jet fuel is 0.029 pounds per square inch at 100 °F, which is equivalent to 0.2 kPa. Therefore, both fuels exhibit vapor pressures well below the 3.5 kPa limit discussed above.

Approximately 57 engines across NASWI are subject to 40 CFR 63 Subpart ZZZZ, which requires that 13 of these engines meet the requirements of 40 CFR 60 Subpart IIII to meet the requirements of 40 CFR 63 Subpart ZZZZ. In general, 40 CFR 63 Subpart ZZZZ requires that newer, smaller engines comply with 40 CFR 60 Subpart IIII. Four engines are subject to requirements in both 40 CFR 63 Subpart ZZZZ and 40 CFR 60 Subpart IIII. In general, these are the larger, newer engines.

Subpart IIII establishes non-resettable hour meter and fuel sulfur requirements, emission standards, and operation and maintenance requirements and recordkeeping.

40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: There are two 4-stroke rich burn stationary spark ignition internal combustion engines in emergency backup service at NASWI (engines ICE-0087-01 and ICE-2629-01) to which this regulation might apply. However, both of these engines were ordered and manufactured prior to the applicability dates of June 12, 2006/January 1, 2009 listed in 40 CFR 60.4230(a)(4)(iv), so subpart JJJJ does not apply to these engines. In the future, this regulation will apply if NASWI installs a stationary spark ignition internal combustion engine. Subpart JJJJ establishes emission limits for NO_x, VOC, and CO from the engines, fuel requirements, operation and maintenance requirements, recordkeeping, and reporting.

40 CFR 61—National Emission Standards for Hazardous Air Pollutants (NESHAP)

NASWI is subject to HAP-specific requirements in 40 CFR 61. The applicability of relevant NESHAP regulations is addressed below.

40 CFR Part 61 Subpart A – General Provisions: The general provisions of Part 61 – National Emission Standards for Hazardous Air Pollutants apply to asbestos material handling activities at NASWI. These requirements are listed in Section 3 of the AOP as generally applicable to asbestos handling activities.

40 CFR Part 61 Subpart M - National Emission Standards for Asbestos: When an asbestos-containing structure at NASWI is renovated or demolished, the provisions of 40 CFR 61.145, 61.148, and 61.150 apply. Appendix A to Subpart M, while helpful guidance for complying with the NESHAP, is not itself a directly applicable requirement per 59 FR 31158 (June 17, 1994):

The new appendix A to the Asbestos NESHAP does not supersede, alter or replace the Asbestos NESHAP; nor does it change the scope or stringency of the NESHAP. Rather appendix A interprets the NESHAP as it applies to roof removal operations, in order to provide particularized guidance which, if followed, would promote compliance with, and more effective and consistent enforcement of, the NESHAP in such operations. This interpretive rule is intended as guidance to the roofing industry and the public and does not constitute an action which is subject to judicial review under Section

307(b)(1) of the Clean Air Act, 42 U.S.C. 7607(b)(1), or under the Administrative Procedure Act, 5 U.S.C. 704.

40 CFR 63—National Emission Standards for Hazardous Air Pollutants (NESHAP)

NASWI is a major source of HAPs due primarily to the painting and cleaning operations associated with aerospace work conducted at the facility. The applicability of relevant NESHAP regulations is addressed below.

40 CFR 63 Subpart A – General Provisions: NESHAP General Provisions apply to “affected sources”. The affected sources as NASWI are activities related to the rework of aerospace vehicles and components as defined in 40 CFR 63 Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities. NESHAP Subpart A requirements are listed in Section 3 of the AOP as generally applicable to affected sources.

40 CFR 63 Subpart GG—National Emission Standards for Aerospace Manufacturing and Rework Facilities: NASWI operates equipment and performs activities subject to Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities. This rule is also referred to the Aerospace NESHAP. Applicable portions of this regulation and associated MR&R are listed in Section 5 of the AOP.

The affected sources subject to this subpart include each cleaning operation (such as hand-wipe cleaning, spray gun cleaning, and flush cleaning), each primer application operation, each topcoat application operation, each depainting operation, each chemical milling maskant application operation, and each waste storage and handling operation. The activities subject to Subpart GG are limited to the manufacture or rework of aerospace vehicles or components. As of the time of permit issuance, NASWI does not conduct chemical milling maskant application operations and is not capable of depainting entire aircraft. Therefore, requirements related to chemical milling maskant operations and aircraft depainting are not included in the AOP.

Aerospace NESHAP activities occur in the following areas: Hangars, flying club, FRC, building 2818, and the test cell maintenance building 2766.

40 CFR 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines:

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE)⁷ located at major and area sources of HAP emissions.

⁷ A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

This subpart applies to each “affected source”, which consists of any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

There are numerous categories of RICE, each with its own set of requirements; therefore, subpart ZZZZ applicability is spread across many tables in the Specifically Applicable Requirements section of the AOP. The Stationary Reciprocating Internal Combustion Engine Regulation Navigation Tool (<http://www.epa.gov/ttn/atw/rice/output/quiz.html>) was used to assist in the preparation of these tables. However, the full rule was reviewed and the regulations that were deemed applicable but were not referenced in the guidance document generated by the RICE tool were included in the relevant table. The RICE tool is simply guidance and does not provide enforceable requirements.

The categories of RICE as listed in the AOP are based on 40 CFR 63 Subpart ZZZZ and are as follows:

- Existing emergency compression ignition (CI) engine ≤ 500 hp located at a major source of HAP, constructed before June 12, 2006.
- New & reconstructed emergency CI engine ≤ 500 hp located at a major source of HAP, constructed on or after June 12, 2006.
- Existing emergency CI engine > 500 hp located at a major source of HAP, constructed before December 19, 2002.
- New & reconstructed emergency CI engine > 500 hp located at a major source of HAP, constructed on or after December 19, 2002.
- New & reconstructed non-emergency CI engine ≤ 500 hp located at a major source of HAP, constructed on or after June 12, 2006.
 - The engine in this category is a wood chipper. The engine associated with the wood chipper is actually larger than 500 hp but is tuned to and can only be operated at 475 hp as currently configured by the manufacturer.
- Existing non-emergency CI engine < 100 hp located at a major source of HAP, constructed before June 12, 2006
 - It appears that 63.6612, which requires initial source tests according to tables 4 and 5 of this subpart, would apply to an engine in this category. However, a close reading of table 5 indicates that initial source tests are not required for existing non-emergency CI engines less than 100 hp located at a major source.
- Existing emergency spark ignition (SI) engine ≤ 500 hp located at a major source of HAP, constructed before June 12, 2006.

40 CFR 63 Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters: NASWI owns or operates equipment subject to Subpart DDDDD - National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters. Table 2-1 (above) discusses unit applicability, and the reasons for applicability, in detail.

40 CFR 63 Subpart CCCCC—National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities: There are three gasoline dispensing stations located within the NASWI facility. This subpart applies to each gasoline dispensing facility (GDF) that is located at an area source of hazardous air pollutants (i.e., has the potential to emit considering controls, in the aggregate, less than 10 tons per year of any hazardous air pollutant and less than 25 tons per year of any combination of hazardous air pollutants). This subpart clearly does not apply to the two gasoline stations located at Ault Field (AutoPort NEX and the government fleet station) since these two stations are part of the NASWI facility, which is a major source of HAPs, and were included in the NASWI AOP at the time subpart CCCCC (6C) became effective. However, the rule became effective while the Seaplane Base and the NEX gasoline station were still classified as area sources since the Seaplane Base was not included in the NASWI AOP until the 2013 renewal. Upon incorporation into the NASWI AOP, the Seaplane Base and the SPB NEX gasoline station became part of a major source of HAPs.

The EPA released a memorandum on May 16, 1995 to provide guidance known as “once in, always in”, which is a reference to maximum achievable control technology (MACT) applicability to a source once it exceeds emissions thresholds that reclassifies a source from an area source to a major source. Essentially, once a source meets the applicability criteria for a MACT standard (i.e., a NESHAP), that MACT standard applies to the source, regardless of emissions. The guidance memo applies generally to area sources that exceed major source thresholds; however, the guidance does not address MACT standard applicability going in the reverse direction – that is, when an area source with an applicable standard becomes major. Does an area source MACT continue to apply to a newly established major source?

The “once in, always in” guidance seeks to prevent “backsliding”, in that once control is required for a source, that control must be maintained. In the GDF NESHAP case, the primary requirements are integrity testing once every three years. It could be argued that ceasing to require the SPB NEX to comply with 6C would constitute backsliding as defined in the guidance.

Another way to analyze the applicability of 6C to the SPB NEX gasoline station is to consider the preamble published in the Federal Register (Jan 10, 2008, pp. 1916-1953). In answer to a commenter’s question, EPA states that the GDF rule applies to area sources and that gasoline distribution activities located at a source that is major as a result of any other activity is not subject to the rule. Furthermore, Table 3 to subpart 6C lists general provision 63.6(c)(5) “compliance dates for existing

area sources that become major” as not applicable to subpart 6C. This suggests that 6C is no longer applicable to the SPB NEX once included in the AOP. The AOP has been written with the interpretation that 6C does not apply to the SPB NEX gasoline dispensing station.

Other NESHAP Requirements

NASWI submitted a Part 1 Application Case-by-Case MACT Determination [112(j) - MACT Hammer] to the NWCAA on May 14, 2002 and a Part 2 Application on January 27, 2003. These applications discussed a number of proposed MACT standards.

After further review of these standards, a determination was made that most of the standards will not apply to operations at NASWI. The following table identifies the NESHAP rules and whether NASWI is exempt or not.

Table 3-1 MACT Standard Applicability

40 CFR 63 Subpart	NESHAP Source Description	Promulgation Date	Reason for Exemption
EEEE	Organic liquids distribution (excluding gasoline)	8/25/03	Exempts kerosene, diesel, and other fuels consumed on site at NASWI
MMMM	Miscellaneous metal parts and products	8/29/03	Exempts Armed Forces facilities
PPPP	Surface coating of plastic parts and products	8/29/03	Exempts Armed Forces facilities
QQQQ	Surface coating of wood building products	5/28/03	Exempts facility construction or maintenance operations
RRRR	Surface coating of metal furniture	1/2/04	Exempts Armed Forces facilities
GGGGG	Site remediation	10/8/03	The facility is exempt as a non-RCRA, non-CERCLA remediation site generating ≤ 1Mg HAP per year
NNNN	Large appliances	7/23/02	The facility is exempt as the coating operations are for facilities maintenance

40 CFR 63 Subpart	NESHAP Source Description	Promulgation Date	Reason for Exemption
PPPPP	Engine test cell/stands	5/27/03	The T-6 and T-10 test cells are exempt since they are used exclusively for combustion turbine aircraft engines (40 CFR 63.9290(d)(1)). The T-17 and auxiliary test stands are exempt because they were constructed prior to May 14, 2002. Per 40 CFR 63.9290 (a)(1) and (b), this makes the test stands existing sources, and existing sources don't have to meet the requirements of the rule.

Compliance Assurance Monitoring (CAM)

40 CFR 64 – Compliance Assurance Monitoring: NASWI is not subject to the CAM rule. The CAM rule under 40 CFR 64 requires owners or operators of subject sources to conduct monitoring that satisfies specific criteria established in the rule to provide a reasonable assurance of compliance with applicable requirements. Monitoring focuses on emission units that rely on pollution control equipment to achieve compliance. The CAM rule coordinates existing monitoring requirements with additional monitoring if current requirements fail to specify adequate detail. CAM applies to units that meet all three of the following criteria: (1) are subject to an emission limit, other than an emission limit from a NSPS or NESHAP that was proposed after November 15, 1990 (2) use an add-on control device to meet the emission limit, and (3) have potential pre-control device emissions that would classify the unit as a major source (referred to as an “uncontrolled major source”).

The primary emission units at NASWI are boilers, engines, paint and blasting booths, and gasoline dispensing stations. CAM does not apply to the boilers because the boilers at the facility do not employ any add-on control device. CAM is not applicable to the engines because they are not subject to an emission limit for which a control device is employed to achieve the limit, or the emission limits to which they are subject were established after November 15, 1990. Emission limits for paint and blasting booths employed in aerospace rework activities were established after November 15, 1990, as well. Booths in non-aerospace service are not subject to specific emission limits. Finally, gasoline dispensing stations are subject to federal regulations promulgated after November 15, 1990. Therefore, there are no emission units at NASWI that are subject to CAM.

Risk Management Plan (RMP)

40 CFR 68 – Chemical Accident Prevention Provisions: NASWI is not subject to the provisions of this program at the time of permit renewal. The goal of 40 CFR 68 and the Risk Management Program (RMP) it requires is to prevent accidental release of substances that can cause serious harm to the public and the environment and to mitigate the severity of releases if they do occur. If a tank, drum, container, pipe, or other process at a facility contains any of the regulated toxic and flammable substances listed in 40 CFR 68.130 in an amount above the “threshold quantity” specified for that substance, the facility operator is required to develop and implement a risk management program. At the time of permit renewal, NASWI states that no substance listed in 40 CFR 68.130 is maintained at the facility at or above threshold quantities. NASWI will certify in the annual compliance certification that, should the facility become subject to the regulation, NASWI will comply with the requirement to submit a Risk Management Plan according to the requirements of 40 CFR 68.

New Source Review (NSR)

Basic Information

New Source Review (NSR) requires stationary sources of air pollution to acquire permits before they begin construction. NSR is also referred to as construction permitting or preconstruction permitting.

There are three types of NSR permits. A source may have to acquire one or more of these permits:

- Prevention of Significant Deterioration (PSD) permits, which are required for new major sources or a major source making a major modification in an attainment⁸ area;
- Nonattainment NSR permits, which are required for new major sources or major sources making a major modification in a nonattainment area; and
- Minor source permits, which are required for sources that emit pollutants below the major source threshold but above the minor source threshold. It is generally the case that a major new or modified source will also require minor NSR permitting that covers a different subset of pollutants.

What are Permits?

Permits are legal documents that the source must follow. Permits specify what emission limits must not be exceeded and how the source is to demonstrate compliance with the set limits. Permits may contain conditions to ensure that the

⁸ An attainment area means a geographic area designated by EPA at 40 CFR 81 as having attained the National Ambient Air Quality Standard for a given criteria pollutant (Reference: WAC 173-400-030 (9)).

source is built according to the permit application upon which the permitting agency relies for air impact analysis. For example, the permit may specify a stack height that was used by the permitting agency to determine compliance with air pollutant limits. Some limits in the permit may be specified at the request of the source to keep them from being subject to other requirements. For example, the source may take limits in a minor NSR permit to keep the source out of PSD. To assure that sources follow permit requirements, permits also contain monitoring, recordkeeping, and reporting (MR&R) requirements.

Who Issues the Permits?

In Washington State most NSR permits are issued by the Washington State Department of Ecology (Ecology) or local air pollution control agencies. The EPA issues the permit in some cases. Ecology and local air pollution control agencies have their own permit programs that are approved by EPA in the State Implementation Plan (SIP). In general, in the NWCAA jurisdiction, which encompasses Island, Skagit, and Whatcom Counties, Ecology issues major NSR permits (PSD permits) and NWCAA issues minor NSR permits (Orders of Approval to Construct, or OACs).

Prevention of Significant Deterioration (PSD)

Up to the issuance date of this AOP renewal, NASWI has not qualified as a major source under the PSD program (40 CFR 52.21) for any new projects undertaken since the establishment of the PSD program.

Before a major source can be constructed or modified in an area that meets all the health-based ambient air requirements (i.e. in an attainment area), the owner or operator must demonstrate that the project will not cause or contribute to violations of any ambient air quality standard or air quality increment through the PSD permitting program. Also, the owner or operator must demonstrate that the project will not cause significant deterioration in nearby Class I Areas (parks and wilderness areas).

Minor New Source Review

New or modified sources of air pollution are required to obtain a permit from the NWCAA before beginning construction. Permits are referred to as Orders of Approval to Construct (OACs) and contain requirements to minimize air pollution impacts on the environment. The type of activity, the size of the operation, and the kinds of pollutants emitted determine permit conditions.

Other Federal New Source Review Programs

The entire jurisdiction of NWCAA is designated as in attainment for all criteria pollutants. For this reason no other federal new source review programs for new or modified sources of air pollution are applicable.

Greenhouse Gas (GHG) Regulation

Greenhouse gases are chemicals that contribute to climate change by trapping heat in the atmosphere. The greenhouse gases (GHG) recognized by EPA and Ecology are: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF₆). "Hydrofluorocarbons" or "HFCs" means a class of greenhouse gases primarily used as refrigerants, consisting of hydrogen, fluorine, and carbon. NASWI reports GHG emissions to NWCAA and Ecology as part of the required annual emissions inventory.

40 CFR 98, Federal Mandatory Greenhouse Gas Emission Inventory Regulation

This regulation does not apply to NASWI at the time of this permit renewal because GHG emissions from stationary sources at NASWI do not exceed the 25,000 metric ton CO₂ equivalents⁹ (CO₂e). If at some point GHG emissions from stationary sources at the NASWI facility do exceed 25,000 metric tons CO₂e, then NASWI will become subject to this rule. This regulation is implemented in its entirety by the EPA and is specifically excluded from appearing in a Title V air operating permit.

Chapter 173-441 WAC, Reporting of Emissions of Greenhouse Gases

This rule requires greenhouse gas reporting for owners or operators of a source that emits at least 10,000 metric tons of greenhouse gases annually. NASWI is an effected source under this rule. The rule is similar to the existing Federal Mandatory Greenhouse Gas Emission Inventory Regulation (40 CFR 98). NASWI reports GHG emissions to Ecology according to the provisions of this rule.

4. General Assumptions of the Permit

Permit Content

The permit contains (1) standard terms, (2) generally applicable conditions for the type of facility permitted, and (3) specifically applicable conditions originating from approvals to construct and any regulatory orders referencing the facility. Applicable requirements that were satisfied by a single past action on the part of the source are not included in the permit but are discussed in this Statement of Basis. An example would include performance testing to demonstrate compliance with applicable emission limitations as a requirement of initial startup. Regulations that require action by a regulatory agency, but not of the regulated source, are not included as applicable permit conditions.

⁹ CO₂e is the sum of metric tons per year of each greenhouse gas multiplied by the global warming potential (GWP) of the gas. For example, CO₂ has a GWP of 1, and methane has a GWP of 21. Then 100 tons of CO₂ and 10 tons of methane have a CO₂e of: 100*1 + 10*21 = 100 + 210 = 310.

Excluded Requirements

In general, the condition in many OACs issued to NASWI to “install [an emission unit] in accordance with the plans, specifications, and other information submitted with the Notice of Construction Application for Approval” is not included in the AOP since installation is a single past action. OAC conditions that require written notification of initial startup are also not included.

OAC 551 approved the installation and operation of nine emergency generators. Over the years, all but two of the generators have been removed from service. OAC 551 condition 3 applies to four of the generators that were removed; therefore, OAC 551 condition 3 is excluded from the AOP. OAC 551 condition 1 is excluded according to the paragraph above. Conditions 2, 4, and 5 in OAC 551 apply to the two emergency generators that remain in service and are included in the AOP. References to the removed equipment in the conditions that apply to the remaining equipment are not included in the AOP to reduce confusion regarding applicability and requirements.

Federal Enforceability

Federally enforceable requirements are terms and conditions required under the Federal Clean Air Act or under any of its applicable requirements such as NSPS or NESHAP. Local and state regulations may become federally enforceable by formal approval and incorporation into the State Implementation Plan (SIP) or through other delegation mechanisms. Federally enforceable requirements are enforceable by the EPA and citizens of the United States. All applicable requirements in the permit including Standard Terms and Conditions, Generally Applicable Requirements, and Specifically Applicable Requirements are federally enforceable unless identified in the permit as enforceable only by the state (i.e., labeled as “state only”).

Chapter 173-401 WAC is not federally enforceable although the requirements of this regulation are based on federal requirements for the air operating permit program. Upon issuance of the permit, the terms based on Chapter 173-401 WAC will become federally enforceable for the source.

Most rules and requirements are followed by a date in parentheses. Two different versions (identified by the date) of the same regulatory citation may apply to the source if federal approval/delegation lags behind changes made to the Washington Administrative Code (WAC) or the NWCAA Regulation. The date associated with a WAC regulation denotes the “State Effective Date” of the regulation. For SIP-approved WAC regulations (identified by the absence of the “state only” designation), the date represents the “State Effective Date” of the regulation version that was SIP-approved. For NWCAA regulations, the date represents the most recent Board of Directors adoption date, which is identified as the “Passed” or “Amended” date in the NWCAA Regulation. For SIP-approved NWCAA regulations (also identified by the absence of the “state only” designation), the parenthetical

date represents the “Passed” or “Amended” date of the regulation version that was SIP-approved. The date associated with an OAC or PSD permit represents the latest revision date of that order. For a federal rule, the date is the rule’s most recent promulgation date.

Gap Filling

Title V of the Federal Clean Air Act is the basis for the EPA’s 40 CFR 70, which is the basis for the State of Washington air operating permit regulation, Chapter 173-401 WAC. Title V requires that all air pollution regulations applicable to the source be called out in the AOP for that source. Title V also requires that each applicable regulation be accompanied by a federally enforceable means of “reasonably assuring continuous compliance.” Some of the older general regulations and federal NSPS do not have monitoring, recordkeeping and reporting requirements that are sufficient to reasonably assure continuous compliance with emission limitations. Title V, 40 CFR 70, and WAC 173-401-615 all contain a “gap-filling” provision for that situation¹⁰. The permitting agency is required to create MR&R requirements that fill the gap and to incorporate those requirements into the air operating permit. For instance, nuisance rules and opacity requirements have site-specific gap-filled obligations for the source. If a requirement has been gap-filled in the AOP, the MR&R for that term will state “*Directly Enforceable*” above the gap-filled text.

On August 19, 2008, the U.S. Court of Appeals vacated EPA’s 2006 interpretive rule that prohibited states from enhancing monitoring in Title V permits. As a result, permitting authorities again must ensure that monitoring in each permit is sufficient to assure compliance with the terms and conditions of the permit.

Future Requirements

Applicable requirements promulgated with future effective compliance dates may be included as applicable requirements in the permit. Some requirements that are not applicable until triggered by an action, such as the requirement to file an application prior to constructing a new source, are addressed within the standard terms and conditions section of the permit.

¹⁰ WAC 173-401-615(1) Monitoring. Each permit shall contain the following requirements with respect to monitoring:

(b) Where the applicable requirement does not require periodic testing or instrumental or noninstrumental monitoring (which may consist of recordkeeping designed to serve as monitoring), periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the permit, as reported pursuant to subsection (3) of this section. Such monitoring requirements shall assure use of terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement. Recordkeeping provisions may be sufficient to meet the requirements of this paragraph; and

(c) As necessary, requirements concerning the use, maintenance, and, where appropriate, installation of monitoring equipment or methods.

There are presently no pending applications to construct or modify the facility that would trigger New Source Review. NASWI has certified in the permit application that the facility will meet any future applicable requirements on a timely basis.

Compliance Options

NASWI did not request emissions trading provisions or specify more than one operating scenario in the air operating permit application; therefore, the permit does not address these options as allowed under WAC 173-401-650. This permit does not condense overlapping applicable requirements (streamlining) nor does it provide any alternative emission limitations.

5. Permit Elements and Basis for Terms and Conditions

Permit Organization

The Naval Air Station Whidbey Island Air Operating Permit (AOP) is divided into the following sections:

Permit Information

Attest

Table of Contents

Section 1 Emission Unit Identification

Section 2 Standard Terms and Conditions

Section 3 Standard Terms and Conditions for NSPS and NESHAP

Section 4 Generally Applicable Requirements

Section 5 Specifically Applicable Requirements

Section 6 Inapplicable Requirements

Permit Information and Attest

Permit Information

The Permit Information page identifies the source and provides general information relevant to the permit such as the facility address, the responsible corporate official, the permit issuance date and the permit expiration date, and the agency personnel responsible for permit preparation, review, and issuance.

Attest

The Attest page provides authorization for the source to operate under the terms and conditions contained in the permit.

AOP Section 1 Emission Unit Identification

The Emission Unit Identification section lists emission units, rated capacities and/or emission unit description, air pollution controls, and fuel used in the emission unit, if applicable. The AOP Section 5 table that establishes the requirements for a listed emission unit is also referenced in Section 1.

AOP Section 2 Standard Terms and Conditions

The Standard Terms and Conditions section contains administrative requirements and prohibitions that do not have ongoing compliance monitoring requirements. Regulations that give legal authority to the standard terms and conditions are cited for each topic. At times, requirements are paraphrased; the language of the cited regulation takes precedence over the paraphrased summary. For understanding and readability, the terms and conditions have been grouped by function. Similar requirements from the State and the NWCAA are grouped together where possible. Requirements that are not applicable until triggered are also included. An example of these would be the requirement to file a "Notice of Construction and Application for Approval."

AOP Section 3 Standard Terms and Conditions for NSPS and NESHAP

This section contains the generally applicable requirements from Subpart A of 40 CFR 60, Subpart A of 40 CFR 61, and Subpart A of 40 CFR 63. These requirements, which consist mainly of recordkeeping, reporting, and general testing and operation and maintenance standards, apply generally to emission units that are subject to the federal requirements under NSPS and NESHAP.

Introduction to AOP Sections 4 and 5: Generally and Specifically Applicable Requirements

Requirements that limit emissions and broadly apply to all sources within the jurisdiction of the NWCAA are identified in Section 4 - Generally Applicable Requirements. Requirements that limit emissions and apply specifically to emission units at NASWI are identified in Section 5 - Specifically Applicable Requirements. The first column of the tables in these sections contains the term number followed by the pollutant type or requirement type. The second column identifies the regulatory citation. The third column provides a brief description of the applicable requirements for informational purposes and is not itself enforceable. The fourth column identifies monitoring, recordkeeping, and reporting requirements in accordance with WAC 173-401-605(1), -615(1) & (2). If appropriate, test methods associated with an applicable requirement or in accordance with WAC 173-401-615(1)(a) are included in this column.

Many generally applicable requirements do not specify test and/or monitoring methods within the text of the regulation or statute. Since WAC 173-401-615

requires that the permit require monitoring and recordkeeping adequate to demonstrate compliance with requirements, legally enforceable site-specific monitoring methods were established (“gap-filled”) based on the characteristics of the facility, the nature of the underlying requirement, the requirements of WAC 173-401-615, and EPA guidance on monitoring. Sections 0 and 0 below provide a discussion of the basis for including gap-filled MR&R requirements.

Requirements pertaining to operation and maintenance, nuisance, fugitive emissions and odor may be met through adherence to operation and maintenance (O&M) manuals and timely complaint response and follow-up corrective action. Note, however, that NASWI O&M manuals are not included as part of the AOP.

The following discussion of permit terms provides some information on how the facility demonstrates compliance with these terms.

AOP Section 4 Generally Applicable Requirements

Section 4 - Generally Applicable Requirements of the AOP identifies requirements that apply broadly to the facility. These requirements are normally not called out in NOC approvals (i.e., OACs). Instead, they are general air pollution rules found in the NWCAA Regulation or the WAC.

Some of the conditions in this section contain terms that are not well defined or list MR&R for which the rationale is not readily apparent. These items are discussed below.

General Nuisance and Odor (Permit Term 4.3 through 4.6)

NWCAA Regulations and the WAC contain requirements regarding odors and other emissions deemed to be a “general nuisance”. Emissions of air contaminants that damage human health, plant or animal life, or otherwise interfere with the “enjoyment of life and property” are prohibited. These rules, however, do not include specific monitoring, recordkeeping, or reporting requirements. Therefore, per the requirements of WAC 173-401-615, the MR&R for AOP term 4.3 was “gap-filled” with MR&R requirements. The gap-filled MR&R require NASWI to inspect potential sources of nuisance emissions upon receipt of a complaint, repair problems found, document the inspection and subsequent work, and notify NWCAA if repairs cannot be made in a timely fashion. Since the MR&R requirements of term 4.3 were generated as part of the Air Operating Permit, the MR&R is denoted as “Directly Enforceable”, which establishes the language as enforceable conditions.

NASWI operates a composting facility. The composting facility doesn’t have an OAC and there are no specific local, state, or federal regulations that apply. Therefore, the facility is not listed in Section 5 of the AOP. However, general nuisance requirements do apply. Because of the nature of composting, the NASWI composting facility is a potential source of odor. NWCAA gap-filled the MR&R requirements for this facility with requirements taken from the Composting Facility Operating Standards Manual and NASWI’s standard operating practices for the facility. This monitoring was deemed to be sufficient because the composting facility

was been operating for 15+ years, and we haven't received any odor complaints. In addition, the operating practices listed in NASWI's manual and standard operating practices are similar to what is done at other composting facilities in Washington state.

Fugitive Emission Standards (Permit Terms 4.7 through 4.11)

Permit conditions that limit fugitive emissions refer to permit term 4.3, which requires the facility to respond to and correct nuisance emissions as soon as possible. If emissions cannot be corrected within four hours, NASWI must notify the NWCAA within twelve hours with a description of the complaint and action being taken to resolve the problem. NASWI will provide assurance of compliance with these requirements in the annual compliance certification and by maintaining a log of nuisance complaints and associated repairs and mitigation actions.

Opacity Standard (Permit Term 4.12)

The generally applicable opacity requirement limits any source at the facility to 20% opacity according to Ecology Method 9A; however, these limits are not accompanied by specific MR&R. Consequently, the MR&R for this term is gap-filled. Because there are many emission units with more stringent specifically applicable opacity requirements at 5% or 10% opacity by EPA Method 9 or Ecology Method 9A and in order to standardize the facility-wide response to visible emissions, the MR&R for the opacity standard is written such that any visible emissions require immediate action with increasing stages of monitoring, depending on the situation. Any observed visible emissions (VE) require that one of three steps be taken within 24 hours: correct the problem, shut the unit down, or a certified reader shall determine the opacity according to EPA Method 9, which is a six-minute standard. If any three minutes during the six-minute observation or if the EPA Method 9 test itself shows emissions in excess of any standard, an Ecology Method 9A reading must be taken, if applicable. If a certified VE reader is unavailable to read the emissions, NWCAA will assume that all opacity standards have been exceeded. Observations and actions taken must be recorded and made available at the facility for inspection. The MR&R requirement for opacity and particulate matter standards (discussed below) is written to allow reduced opacity observation length when the opacity levels are clearly below the standard.

Demonstration of compliance with permitted visible emission limits must be qualitatively determined based on visual opacity observations by NASWI or contracted staff on a monthly basis when a combustion unit operates or on a quarterly basis if the emission unit is a liquid or gaseous fuel boiler with a heat input of less than 8 MMBtu/hr or if the emission unit is an infrared radiant heater. Any observed visible emissions require immediate corrective action, followed by consecutive daily opacity measurements according to EPA Method 9 if visible emissions are below all applicable standards, or by Ecology Method 9A if any applicable standard is exceeded until an opacity level less than the applicable limit

is achieved. When this level is reached, the facility may revert to monthly (or quarterly, if applicable) opacity observations.

If opacity is greater than an applicable emission standard, immediate corrective action is required and an upset condition must be reported to NWCAA. All Method 9 or 9A opacity readings must be taken by an individual holding a valid Certification of Completion for Plume Evaluation Training from Ecology or other authorized training facility.

This MR&R is meant to capture all possible exceedances of any applicable opacity standard while providing a consistent set of steps to be taken when any opacity is observed at the facility.

Particulate Matter Standards (Permit Terms 4.13, 4.14, and 4.15)

Combustion units (e.g., engines and boilers), blasting booths, and spray paint booths are sources of particulate matter emissions at NASWI. The limit established in both the NWCAA regulations and the WAC is 0.1 and 0.05 grains per dry standard cubic foot corrected to 7% O₂, depending on the type of emission unit. Permit conditions require that NASWI visually monitor emissions from these stacks. Opacity monitoring is a surrogate for particulate matter source testing, with NASWI taking corrective action if visible emissions are observed. Based on NWCAA experience and past inspections at NASWI, an exceedance of the particulate matter standard is believed to be unlikely. Specific opacity requirements in Section 5 apply to certain units and supersede the opacity monitoring requirements in Section 4 for those specific pieces of equipment. In addition, NASWI provides assurance of compliance with these requirements in an annual compliance certification, which is signed by a responsible official who is held accountable for the truth and accuracy of the statements he or she certifies.

Sulfur Dioxide Standards, Stack Emissions (Permit Terms 4.16 through 4.18)

Combustion units (e.g., engines and boilers) are sources of sulfur dioxide emissions. The Heating Plant boilers are limited by conditions specified in the AOP to burn either natural gas or JP-8 fuel oil containing no more than 0.3% by weight sulfur. Engines that power emergency generators, other non-emergency engines, and other boilers throughout the facility are required to burn natural gas, low-sulfur diesel (0.05 wt% sulfur), or ultra-low sulfur diesel (0.0015 wt% sulfur).

Sulfur Dioxide Standards, Stack Emissions (Permit Terms 4.16 and 4.18)

These permit terms limit emissions to 1,000 parts of sulfur dioxide (SO₂) per million parts of stack gas, on a dry volumetric basis (ppmdv), corrected to 7 percent oxygen, calculated on an hourly average. 1,000 ppmdv SO₂ at 7% oxygen can be converted to mass of SO₂ per volume of stack gas using the ideal gas law:

$$\frac{1000 \text{ ft}^3 \text{ SO}_2}{1,000,000 \text{ ft}^3 \text{ exhaust}} \times \frac{1 \text{ atm}}{\frac{0.73024 \text{ ft}^3 \text{ SO}_2 \cdot \text{atm}}{^\circ\text{R} \cdot \text{lbmol SO}_2} \cdot 527.67 \text{ }^\circ\text{R}} \times \frac{64 \text{ lb SO}_2}{\text{lbmol SO}_2} = \frac{166.1 \text{ lb SO}_2}{1,000,000 \text{ ft}^3 \text{ exhaust}}$$

The mass of sulfur dioxide per volume of exhaust gas can be used in equation 19-1 along with the table 19-2 F-factor for distillate fuel (9190 scf/MMBtu) from 40 CFR 60 Appendix A Method 19 in order to determine the pollutant emission rate per fuel energy input:

$$\frac{166.1 \text{ lb } SO_2}{1,000,000 \text{ ft}^3 \text{ exhaust}} \times 9190 \frac{\text{ft}^3 \text{ exhaust}}{\text{MMBtu fuel heat input}} \times \left(\frac{20.9}{20.9 - 7} \right) = \frac{2.295 \text{ lb } SO_2}{\text{MMBtu fuel heat input}}$$

Since JP-8 has the highest allowable and highest potential fuel sulfur, if JP-8 can be shown to be in compliance with the sulfur dioxide emission limit, then the other, lower-sulfur fuels will also meet the limit. Given that one mole of sulfur in the exhaust originated as one mole of sulfur in the fuel and the energy content of JP-8 is approximately 18,500 Btu/lb, we can back-calculate the weight percent of fuel sulfur that must not be exceeded in order to meet the sulfur standard:

$$\begin{aligned} \frac{2.295 \text{ lb } SO_2}{\text{MMBtu fuel heat input}} \times \frac{18,500 \text{ Btu}}{\text{lb JP} - 8} \times \frac{\text{MMBtu}}{1,000,000 \text{ Btu}} \times \frac{1 \text{ lbmol } SO_2}{64 \text{ lb } SO_2} \times \frac{1 \text{ lbmol } S}{1 \text{ lbmol } SO_2} \times \frac{32 \text{ lb } S}{1 \text{ lbmol } S} \\ = \frac{0.02 \text{ lb } S}{\text{lb JP} - 8} = 2 \text{ wt\% } S \text{ in JP} - 8 \text{ fuel} \end{aligned}$$

Note: A "lb-mole" of a pure gas weighs the molecular weight of that gas in pounds and occupies 385.3 ft³ at 68° F and 760 mmHg pressure. (A temperature of 68° F and a pressure of 760 mmHg are standard conditions according to NWCAA Section 200). A "lb-mole" of sulfur (S) weighs 32 lb and reacts with a lb-mole of oxygen (O₂) which also weighs 32 lb to form a lb-mole of sulfur dioxide, which weighs 64 lb. Therefore, 2 lb of SO₂ are generated for every lb of sulfur in the fuel.

Because JP-8 could contain up to 2 wt% sulfur and still meet the 1000 ppmdv SO₂ at 7% oxygen, and because the JP-8 specification is not to exceed 0.3 wt% sulfur, combustion of JP-8 meeting the sulfur specification and limit established in the AOP will not exceed the 1,000 ppmdv SO₂ at 7% oxygen limit. Therefore, NASWI can show compliance with the 1,000 ppmdv SO₂ at 7% oxygen hourly average limit by burning only natural gas, ULSD, and JP-8 jet fuel and by maintaining fuel oil supplier-provided records of fuel oil specification, including sulfur content, for all oil burned.

Sulfur Dioxide Standard, Fuel Content (Permit Term 4.18)

This condition limits the sulfur content of fuel used at the facility. No. 1 distillate is limited to 0.3% by weight sulfur, No. 2 distillate is limited to 0.5% by weight sulfur, and gaseous fuels are limited to 50 gr/100 scf. JP-8 is essentially No. 1 distillate fuel, and the JP-8 fuel specification requires that the fuel contain no more than 0.3 wt% sulfur. NASWI has switched to ultra-low sulfur diesel (ULSD) fuel for use across the facility, and ULSD fuel contains 0.0015 wt% sulfur or less. NASWI purchases natural gas from Cascade Natural Gas, and the purchase contract specifies that the total sulfur be less than 5 gr/100 scf natural gas, which is 1/10th of the limit for gaseous fuels. NASWI can adequately show compliance with this requirement by burning only natural gas, ultra-low sulfur diesel, or JP-8, and

maintaining fuel oil supplier-provided records of fuel oil specification, including sulfur content, for all oil burned.

AOP Section 5 Specifically Applicable Requirements

This section contains tables that list applicable requirements that specifically apply to the main emission units. AOP Section 5 is separated into four sections that cover the main categories of emission units: boilers and heaters, painting and depainting operations, gasoline dispensing stations, and stationary internal combustion engines. The emission limits in Section 5 are based on federal NSPS and NESHAP requirements and best available control technology (BACT) determinations made as part of minor NSR and established by OAC conditions. The format and organization of this section are the same as for the generally applicable requirements.

Some specifically applicable requirements do not have source monitoring requirements due to the inherent nature of the source and the likelihood that the legal requirement will not be violated. Some of the conditions in this section contain terms that are not well defined or list MR&R for which the rationale is not readily apparent. These terms are discussed below.

For example, most combustion equipment that have a specifically applicable opacity limit require that NASWI monitor the combustion source for opacity according to the MR&R listed under the generally applicable opacity limit. This was done to keep opacity monitoring activities consistent across the facility, for ease of recordkeeping, and to facilitate compliance determination. In each case, the particular opacity limit is established in the specifically applicable requirements of Section 5, but the MR&R requirements are stipulated in Section 4. Demonstrating compliance with the unit specific opacity limit is achieved by following the MR&R established in the generally applicable requirements section with the specifically applicable limit instead of the generally applicable limit of 20% opacity, although the 20% opacity limit also applies.

Boilers and Heaters – Tables 5-1 through 5-7

The requirements in Table 5-1 through 5-7 stem from OACs issued, 40 CFR 60 Subpart Dc and 40 CFR 63 Subpart DDDDD.. Many of the AOP terms for the boilers that cite the OAC contain gap-filled, or directly enforceable, language. In particular, gap-filling requires that the boilers be tested for NO_x emissions while burning both JP-8 jet fuel and natural gas once every five years to demonstrate compliance with the NO_x emission limits.

Painting and Paint Removal Operations – Tables 5-8 through 5-12

AOP term 5.6.1 in *Table 5-6 Area (Outside of a Spray Booth, e.g., inside Hangars) Coating, Depainting, and Cleaning Operations subject to Aerospace NESHAP (40 CFR 63 Subpart GG)* includes italicized text to emphasize that the hand-wipe cleaning housekeeping requirements apply to a subset of the allowable hand-wipe cleaning solvents. For example, isopropyl alcohol, a commonly used solvent at NASWI, has a vapor pressure of 33 mmHg at 20 °C according to its Material Safety

Data Sheet (MSDS). As such, isopropyl alcohol meets the vapor pressure standard for hand-wipe cleaning solvents (< 45 mmHg vapor pressure at 20 °C), but management of isopropyl alcohol-laden cloths is regulated according to AOP term 5.6.1 since its vapor pressure is greater than 7 mmHg at 20 °C.

Table 5-6 lists requirements for "Area (Outside of a Spray Booth, e.g., inside Hangars) Coating, and Cleaning Operations subject to Aerospace NESHAP (40 CFR 63 Subpart GG)". 40 CFR 63.745(g)(4) allows "painting parts in an area identified in a title V permit, where the permitting authority has determined that it is not technically feasible to paint the parts in a booth". As of the date of this AOP renewal, NASWI has not requested any such allowance.

The base has several glove box blasters. The glove box blasters are less than 200 cubic feet in size. Their size limits their use to "parts or units normally removed from the aerospace vehicle for depainting" and are, therefore, exempt from the depainting standards. Since they are not used for cleaning, painting, or other aerospace operations, they are not subject to the aerospace NESHAP and are not required to have a SSMP.

Table 5-7 Fleet Readiness Center Div 500 Water Wall Paint Spray Booths BTH-2547-02 & -03 lists Aerospace NESHAP requirements applicable to these water wall paint booths. In particular, AOP term 5.7.8 requires a startup, shutdown, and malfunction plan (SSMP), which includes operation and maintenance criteria, in accordance with 40 CFR 63.6, for operation of the water wall booths to control HAP emissions. (Dry particulate filter systems operated per manufacturer's instructions are specifically exempted from the SSMP requirement). These waterwash systems require an SSMP since they are used to control inorganic HAP emissions subject to the NESHAP.

Table 5-9 Blast Booth RBL-0995-01, Curing Oven FRN-0995-01, and Pyrolysis Cleaning Furnace FRN-0995-02 lists requirements from OAC 755a. OAC 755a was revised in 2004 to allow Aerospace NESHAP-regulated equipment to be processed. PCB-PP995-01 was removed, and a new powder coating booth, PCB-PP995-02 was installed in its place. The new booth, PCB-PP995-02, did not received an NOC as the booth vents indoors and is used for parts that are exempt from the Aerospace NESHAP. The requirements of OAC 775a relating to the removed powder coating booth were removed from the AOP as part of the 2015 AOP revision.

Gasoline Dispensing Stations – Tables 5-13 through 5-15

The three gasoline dispensing stations across NASWI each operate under their own permit; however, the requirements for each station are essentially the same. The Ault Field Naval Exchange gasoline station, however, operates an E85 (85% ethanol, 15% gasoline) tank, which has leak testing provisions specific to it.

The Government Fleet Gasoline Station, for which requirements are listed in Table 5-12, is a small fuel dispensing facility; 2011 annual throughput was less than 20,000 gallons gasoline. WAC 173-491-040(4)(a) requires installation and maintenance of stage I vapor recovery for gasoline dispensing stations with annual

throughput greater than 360,000 gallons. Since the throughput of the Government Fleet Station is much less, WAC 173-491-040 would not apply. However, OAC 646 requires that stage I equipment be continuously maintained and operated in a vapor tight manner according to WAC 173-491 and NWCAA 580. Therefore, in instances where WAC 173-491-040 is cited, OAC 646 condition 2 is also cited since that is the provision that requires compliance with the state rule. NWCAA 580 applies to the Government Fleet Station by virtue of its applicability to all gasoline stations installed or reconstructed after January 1, 1990 with a nominal total gasoline storage capacity greater than 10,000 gallons.

Stationary Internal Combustion Engines – Tables 5-16 through 5-30

Table 5-16 lists requirements for the newer “T-10” Engine Test Cell; the older test cell, “T-6”, was constructed prior to the NSR program and, therefore, does not have a permit.

The remaining tables in the Stationary Internal Combustion Engine section are organized as follows: The odd numbered tables (Tables 5-17, 5-19, etc.) list the engines to which the requirements in the following even-numbered table apply. For example, Table 5-17 lists the location, identification, associated OAC (if applicable), and use of the engines to which the requirements in Table 5-18 apply.

AOP Section 6 Inapplicable Requirements

Washington Administrative Code 173-401-640 allows a determination regarding the applicability of requirements with which the source must comply. Section 6 of the permit lists requirements deemed inapplicable based on the applicability of the cited regulation.

6. Insignificant Emission Units/Activities

Categorically exempt insignificant emissions units listed in WAC 173-401-532 are present at NASWI. These categorically exempt emissions units normally have low emissions and are considered insignificant by regulation and not of sufficient importance to list in the permit. Some emission units and activities are considered insignificant according to WAC 173-401-533 based on size or maximum rated capacity. Other emission units or activities generate only fugitive emissions for which there are no specifically applicable requirements. These activities are categorized as insignificant by Chapter 173-401-530(1)(d) WAC. All insignificant emission units (IEUs) are subject to AOP Section 4 – Generally Applicable Requirements. IEUs and activities at the facility are listed in the following table.

Note that a unit cannot be an IEU if it is subject to an NSPS or NESHAP. This distinction is important because some of the units that are significant at NASWI would qualify as IEUs but for the fact that they are subject to a NESHAP. Since a NESHAP applies, these units are not eligible to be IEUs and are instead identified as significant units in the AOP.

TABLE 6-1 INSIGNIFICANT EMISSION UNITS AND ACTIVITIES

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
AST-0016-01 SPB Fire Station	300-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0018-01 SPB Transportation building	1,167-gallon used oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-0027-01 SPB Fleet Aviation Spec. Op. Training	1000-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0312-01 SPB sewer lift station	550-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0357-01 SPB Public Works Filling Station	2,000-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0384-03 Central Heating Plant	10,000-gallon JP-8 storage tank	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
AST-0384-04 Central Heating Plant	10,000-gallon JP-8 storage tank	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
AST-0386-03 Hangar 5	1,500 gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0420-02 Wastewater Treatment Plant headworks "fly lift"	300 gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0421-01 Ault Field sewer lift station	100 gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0430-01 Weapons bunker	120 gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0856-01 & 02 Taxiway Airfield	300 gallon and 65 gallon (respectively) diesel storage tanks	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0858-01, 02, 03 Racon	550 gallon, 240 gallon, and 1,000 gallon (respectively) diesel storage tanks	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
AST-0870-01 SPB sewer lift station	550 gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0874-01 & -02 Radio Transmitter Bldg	300 gallon and 65 gallon (respectively) diesel storage tanks	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0889-01 Vault B taxiway	65 gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0894-01 PAR site (radar)	150 gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0975-01 AF/Telephone Exchange	75 gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0976-02 Aircraft Systems Training	500-gallon JP-8 storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0992-01 SPB Fuel "T" Pier Barge/Main/Pump Station 892 secondary containment	137-gallon JP-8 storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0993-01 Navy Hospital Front	1,000-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0995-01	550-gallon used oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2525-A	2,500-gallon JP-8 storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2544-01 & 02 Hangar 7	350 gallon and 275 gallon (respectively) diesel storage tanks	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2577-01 AF/Intersections of Runway	300 gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2580-01 AF/Small Arms Training Center	300 gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
AST-2547-01 Fleet Readiness Center	396-gallon used oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2547-02 Fleet Readiness Center	800-gallon quench oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2549-01 Auto Hobby Shop	180-gallon used oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2595-7 Ault Field NEX Gas Station	180-gallon used oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2596-01 & -02 Radio tacan	500 gallon and 65 gallon (respectively) diesel tanks	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2621-01 Liquid oxygen/nitrogen	1,000-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2633-01 Golf Course	500-gallon gasoline storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2633-02 Golf Course	300-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2641-01 Security Training Building	500-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
AST-2642E-01 East of bldg. R-43 and 2641	2,000-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2642E-02 East of bldg. R-43 and 2641	550-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2644-01 Temp. fire station and recycle annex	500-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2671-01 Fuel Farm #1 oil/water separator	433-gallon reclaimed fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2672-01 Fuel Farm #2 oil/water separator	433-gallon reclaimed fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2673-01 Fuel Farm #3 oil/water separator	433-gallon reclaimed fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2674-01 Fuel Farm #4 oil/water separator	433-gallon reclaimed fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
UST-2700-01 & 02 NOPF bldg.	57-gallon diesel storage tanks	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2700-04 & 05	250-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2742-01 Commissary	260 gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2757-01 Bulk liquid storage yard, paint storage	10,000-gallon used oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2757-02 Bulk liquid storage yard, paint storage	15,000-gallon used oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
AST-2757-03 Bulk liquid storage yard, paint storage	5,000-gallon oily water storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2757-04 Bulk liquid storage yard, paint storage	3,500-gallon used oil/oily water storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2765-01 T-10 Jet Test Cell	120-gallon engine preservative oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2766-01 T-10 Jet Test Cell	385-gallon used oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2772-01 Tactical Support Center	1,000 gal diesel tanks	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2872-01 & -02 Middle of taxiways C, E and J	30,000-gallon each JP-8 storage tanks	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
Throughout Base	Big diesel tanks	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
AST-2910-01, -02, & -03 Fuel facility	1,260,000-gallon each JP-8 storage tanks	WAC 173-401-533(2)(t) storage of high boiling point material, vp not more than 5 mmHg at 21°C
AST-2911-02 Refueler shop	300-gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
AST-2911-03 Refueler shop	350-gallon JP-8 and water storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2911-05	494 gallon jet fuel skid tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2930-01 Marina MOGAS Boat Fueling	550 gallon gasoline tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
BKG-AULT-01	JP 8 transfer to aircraft	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
BKG-SPB-01	JP 8 transfer to pipeline	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
BBL-0018-01	Glove box blasting (<0.75 tpy PM ₁₀)	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (e) 0.75 tons per year of PM ₁₀
BBL -0371-01	Glove box blasting (<0.75 tpy PM ₁₀)	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (e) 0.75 tons per year of PM ₁₀

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
BBL -2547-03	Glove box blasting (<0.75 tpy PM ₁₀) FRCNW 500 Division	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (e) 0.75 tons per year of PM ₁₀
BBL -2547-04	Glove box blasting (<0.75 tpy PM ₁₀) FRCNW 500 Division	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (e) 0.75 tons per year of PM ₁₀
BBL -2731-01	Glove box blasting (<0.75 tpy PM ₁₀)	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (e) 0.75 tons per year of PM ₁₀
BBL-2547-05	Glove box blasting (<0.75 tpy PM ₁₀) FRCNW 600 Division	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (e) 0.75 tons per year of PM ₁₀
BBL-0731-01	Glove box blasting (<0.75 tpy PM ₁₀)	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (e) 0.75 tons per year of PM ₁₀

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
BKP-ARCR-01	Diesel truck loading	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
BKT-TANK-01	Gasoline loading tanker	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
BTH-0371-01	BOSC Shop – No Aerospace NESHAP work and <2 tons/year VOC	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
BTH-0985-01	Survival equipment shop – No Aerospace NESHAP work and <2 tons/year VOC	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
CLN-0018-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
CLN-0018-02	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
CLN-0278-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
CLN-0371-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
CLN-0423-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
CLN-0994-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
CLN-2549-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
CLN-2549-02	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
CLN-2595-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
CLN-2634-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
CLN-2644-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
CLN-2787-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
CLN-2801-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
CLN-2916-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
DEI-0112-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
DEI-0386-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
DEI-0410-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
DEI-0410-02	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
DEI-2544-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
DEI-2642-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
DEI-2644-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
DEI-2681-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
DEI-2699-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
DEI-2733-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
DEI-2737-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
DEG-0018-01	15 gal degreaser (non-chlorinated solvent)	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
FIR-EODNW-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
FIR-2774-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
FRN-0016-02	0.90 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0017-01 to-09	0.64 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0017-10 to-11	0.082 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0033-01	0.3 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0034-01	0.3 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0081-01 to -04	<1.25 MMBtu/hr per unit.	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0112-01	0.3 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
FRN-0130-01	0.11 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0138-01	0.125 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0138-02	0.11 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0138-03	0.199 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0138-04	0.12 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0138-05	0.12 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-0138-06	0.1 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
FRN-0278-02	0.2 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-OR12-01	0.106 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2580-01	0.08 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2733-01	0.3 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2733-02	0.5 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2734-01	0.30 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2735-01	0.04 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
FRN-2737-01	0.64 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2737-02	0.3 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2742-01 to-05	0.05 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2742-06 to-01	0.15 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2742-11 to-12	0.074 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2749-01	0.04 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2749-02	0.04 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
FRN-2789-01	0.122 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2795-01	0.3 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2813-01	0.072 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2813-02	0.072 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2813-03	0.060 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2874-01	0.4 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-2874-02	0.25 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
FRN-2874-03	0.1 MMBtu/hr Furnace	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
FRN-WHID-03	0.2 MMBtu/hr Furnace (268 units)	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
IRH-2544-01	1.8 MMBtu/hr Infrared heater	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
IRH-2544-02	1.8 MMBtu/hr Infrared heater	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
IRH-2544-03	1.8 MMBtu/hr Infrared heater	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
IRH-2737-01 to 05	1.25 MMBtu/hr total, Infrared heaters	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
IRH-2749-01 to 03	< 5 MMBtu/hr total, Infrared heaters	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
IRH-2681-01 to 04	1.2 MMBtu/hr total, Infrared heaters	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
IRH-2733-01 and 02	1.12 MMBtu/hr total, Infrared heaters	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
IRH-2884-01	0.075 MMBtu/hr Infrared heater	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
IRH-2884-02	0.075 MMBtu/hr Infrared heater	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
IRH-GRH-1 to 3	0.3 MMBtu/hr total, Infrared heater	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
IRH-2903-01 to -03	2.6 MMBtu/hr total, Infrared heater	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
LAN-FILL-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
PAV-ROAD-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
PDC-2801-01	Fugitive emissions <0.75 tpy PM ₁₀	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (e) 0.75 tons per year of PM ₁₀
STP-LAND-01	<2 tons/year	WAC 173-401-530(4)(d) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (d) 2 tons per year of volatile organic compounds (VOC)
UNP-ROAD-01	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
UNP-ROAD-02	Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
UST-0135-01 Bldg. 2508 standby generator for ASCOMM bldg. 135	2,500-gallon diesel storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.
UST-0384-05 Central Heating Plant	25,000-gallon JP-8 storage tank	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
UST-0386-01 Hangar 5 tower (EG tank)	150-gallon diesel storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.
UST-0423-02 Ordnance operations building	2,500-gallon storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.
UST-0423-03	2,500-gallon diesel storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.
UST-0993-01 Hospital and Dental Clinic	6,000-gallon diesel storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.
UST-0993-02 Hospital and Dental Clinic	10,000-gallon diesel storage tank	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
UST-2525-03	385 gallon used oil storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.
UST-2525-04	5,000 gallon jet fuel storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.
UST-2558-03 Flying Club	6,000-gallon aviation gasoline storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.
UST-2558-04 Flying Club	6,000-gallon gasoline storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.
UST-2625-01	25,000-gallon bulk diesel storage tank	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
UST-2626-01	25,000-gallon bulk diesel storage tank	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
UST-2700-01 NOPF building	4,800-gallon diesel storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
UST-2700-02 NOPF building	4,800-gallon diesel storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.
UST-2765-01 T-10 Jet Test Cell	20,000-gallon JP-8 storage tank	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
UST-2872-01 Middle of taxiways C, E, and J product recovery tank	2,500-gallon used oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
UST-2910-04 Fuel facility	2,500-gallon JP-8 storage tank	WAC 173-401-533(2)(c) The following units and activities are determined to be insignificant based on their size or production rate: Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80mm Hg at 21°C.
UVC-2801-01	Ultraviolet curing process	WAC 173-401-532(36) Ultraviolet curing processes.
WHT-2733-01	0.05 MMBtu/hr Water heater	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: Combustion source less than five million Btu/hr. exclusively using natural gas, butane, propane and/or LPG.
WHT-2737-01	0.05 MMBtu/hr Water heater	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: Combustion source less than five million Btu/hr. exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
WHT-2874-01	0.1 MMBtu/hr Water heater	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: Combustion source less than five million Btu/hr. exclusively using natural gas, butane, propane and/or LPG.
WLD-0018-01	Welding 650 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-0371-01	Welding 30 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-0371-02	Welding <1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-0385-01	Welding <1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-0385-02	Welding 4.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-0976-01	Welding 35 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2547-01	Welding 1664 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
WLD-2547-02	Welding 130 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2547-03	Welding 30 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2547-04	Welding 2.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2547-05	Welding <1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2547-06	Welding 12 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2547-07	Welding 50 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2547-08	Welding 1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2547-09	Welding 1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
WLD-2547-10	Welding 1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2547-11	Welding 1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2547-11	Welding 1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2549-01	Welding 4.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2593-01	Welding 1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2609-01	Welding <1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2634-01	Welding 3.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2738-01	Welding <1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
WOO-0371-01	Woodworking (less than threshold emission)	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: 0.75 tons per year of PM ₁₀
WOO-0369-01	Woodworking (less than threshold emission)	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: 0.75 tons per year of PM ₁₀
WWT-AULT-01	Wastewater treatment fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
OVN-2818-01	1.8 MMBtu/hr (NG) Oven	WAC 173-401-533(2)(e) The following units and activities are determined to be insignificant based on their size or production rate: (e) Combustion source less than five million Btu/hr exclusively using natural gas, butane, propane and/or LPG.
SAN-2818-01	Fugitive Emissions <0.75 tpy PM ₁₀	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
BOI-2641-01	Boiler: 0.63 MMBtu/hr, Ultra Low Sulfur Diesel fuel	WAC 173-401-533 (2)(g) Combustion source, of less than one million Btu/hr. if using kerosene, No. 1 or No. 2 fuel oil

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
BOI-0423-01	Boiler: 0.60 MMBtu/hr, Ultra Low Sulfur Diesel	WAC 173-401-533 (2)(g) Combustion source, of less than one million Btu/hr. if using kerosene, No. 1 or No. 2 fuel oil
BOI-2621-01	Boiler: 0.60 MMBtu/hr, Ultra Low Sulfur Diesel	WAC 173-401-533 (2)(g) Combustion source, of less than one million Btu/hr. if using kerosene, No. 1 or No. 2 fuel oil
BOI-2644-01	Boiler: 0.13 MMBtu/hr, Ultra Low Sulfur Diesel	WAC 173-401-533 (2)(g) Combustion source, of less than one million Btu/hr. if using kerosene, No. 1 or No. 2 fuel oil
BOI-0386-01	Boiler: 1.5 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-0386-02	Boiler: 1.5 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2826-01	Boiler: 0.4 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2903-01	Boiler: 0.9 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2903-02	Boiler: 1.5 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2903-03	Boiler: 1.5 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2903-04	Boiler: 1.5 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2544-01	Boiler: 0.65 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2544-02	Boiler: 0.65 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2593-01 & -02	Boilers: 0.75 MMBtu/hr each, Natural gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
BOI-2734-01	Boiler: 0.65 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2837-02	Boiler: 0.65 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2758-02	Boiler: 0.40 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2771-01	Boiler: 0.45 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2938-01	Boiler: 0.33 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2836-03	Boiler: 0.26 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2836-01	Boiler: 0.25 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-0420-01	Boiler: 0.23 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2897-01	Boiler: 0.21 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2897-02	Boiler: 0.21 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
BOI-2970-01	Boiler: 0.15 MMBtu/hr, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG
ETC-2525-03	85 HP combustion turbine	WAC 173-401-533(2)(n) Combustion turbine less than 500 HP
PCB-PP995-02	Indoor vented powder coating booth not subject to Aerospace NESHAP	WAC 173-401-530(4)(3) – Units with PM ₁₀ emission less than 0.75 tons/yr.

FACILITY ID NO.	TYPE AND BASIS OF IEU DESIGNATION	IEU REFERENCE
ARE	Brush application of methylene chloride coating stripper to ground support equipment prior to non-destructive testing	WAC 173-401-530(4)(p) & WAC 173-401-531(1) Methylene chloride emissions less than 0.5 tons/yr.

Note: In the above table the following abbreviations are defined as:

- ARE..... Area
- AST Above ground storage tank
- BBL Blasting cabinet
- BKG JP-8 transfer to aircraft
- BKP Diesel truck loading
- BKT Gasoline loading
- BTH..... Booth
- CHL..... Chiller
- CLN Parts cleaner
- COMP..... Composting facility
- DEG Degreasing unit
- DEI Deicing
- ETC..... Engine test cell
- FIR..... Fire school outdoor burn pad
- FRN..... Furnace
- GAS Gasoline storage and dispensing
- ICE Internal combustion engine
- IRH Infrared heater
- LAN..... Landfill
- OVN Oven

PAV Paved roads
PCB Powder coating
SAN Sanding booth
STR..... Stripping tanks
UNP..... Unpaved road
UST Underground storage tank
UVC Ultraviolet cure
WHT Water heater
WLD Welding operation
WWT Wastewater treatment plant

7. Public Docket

Copies of this permit as well as the permit application and any technical support documents are available online at www.nwcleanair.org and at the following location:

Northwest Clean Air Agency
1600 South Second Street
Mount Vernon, WA 98273-5202

8. Public Comment Period and EPA Review

Modification 1:

A 30-day public comment period ran from Jan. 9, 2016 to Feb. 11, 2016. Notice was posted in the Whidbey Island News-Times, the Washington Department of Ecology's Permit Register, as well as on NWCAA's website. Copies of the draft permit and statement of basis were available on NWCAA's website and at NWCAA's office throughout the public comment period. No public comments were received.

Following the close of the public comment period, the draft Permit and Statement of Basis were sent to EPA (Doug Hardesty) for the mandatory 45-day review period. The review period closed on April 3, 2016. No comments, questions, or objections were received from EPA. The permit became eligible for issuance following the close of the 45-day EPA review period.

9. Definitions and Acronyms

Definitions are assumed to be those found in the underlying regulation. A short list of definitions has been included to cover those not previously defined.

An "applicable requirement" is a provision, standard, or requirement in any of the listed regulations or statutes as it applies to an emission unit at a stationary source.

An "emission unit" is any part or activity of a stationary source that emits or has the potential to emit pollutants.

A "permit" means for the purposes of the air operating permit program an air operating permit issued pursuant to Title 5 of the 1990 Federal Clean Air Act.

"Technology-Based Emission Standard" means a standard, the stringency of which is based on determinations of what is technologically feasible considering relevant factors.

"State" means for the purposes of the air operating permit program the NWCAA or the Washington State Department of Ecology.

The following is a list of Acronyms used in the Air Operating Permit and/or Statement of Basis:

AOP	Air Operating Permit
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
CFR	Code of Federal Regulations
CEDRI	Compliance and Emissions Data Reporting Interface
dscf	dry standard cubic foot
EPA	The United States Environmental Protection Agency
FCAA	Federal Clean Air Act
ISO	International Standards Organization
MACT	Maximum Achievable Control Technology
MR&R	monitoring, recordkeeping and reporting
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NOC	Notice of Construction
NO _x	nitrogen oxides
NSPS	New Source Performance Standard
NSR	New Source Review
NWCAA	Northwest Clean Air Agency
OAC	Order of Approval to Construct

PM	particulate matter
PM ₁₀	particulate matter less than 10 microns in diameter
ppmdv	parts per million by volume (dry basis)
PSE	Puget Sound Energy
RCW	Revised Code of Washington
SIP	State Implementation Plan
STP	Standard temperature and pressure; according to NWCAA regulations, standard conditions are a temperature of 20 degrees C (68 degrees F) and a pressure of 760 mm (29.92 inches) of mercury.
SO ₂	sulfur dioxide
WAC	Washington Administration Code