

Statement of Basis for the Air Operating Permit – Final

Naval Air Station Whidbey Island

Oak Harbor, Washington

November 30, 2018



Serving Island, Skagit & Whatcom Counties

TABLE OF CONTENTS

1. INTRODUCTION 5

2. FACILITY DESCRIPTION 7

 General Facility Description..... 7

 Boilers 8

 Cleaning and Coating Operations 14

 Gasoline Dispensing Stations..... 15

 Aircraft Engine Test Cells and Stands 16

 Stationary Reciprocating Internal Combustion Engines (RICE) 17

 Fire Training Facility 18

 Explosive Ordnance Demolition Unit..... 19

 Ozone Depleting Substance Equipment..... 19

 Asbestos..... 19

 Odors and Other Nuisance Emissions..... 19

 Insignificant Emission Units..... 20

 Equipment Permanently Shutdown..... 20

 Emissions Inventory 21

 Order of Approval to Construct (OAC) History 22

 Compliance History..... 26

 Compliance Reports 27

3. BASIS OF REGULATION APPLICABILITY 27

 40 CFR 60 - New Source Performance Standards (NSPS)..... 27

 40 CFR 61 - National Emission Standards for Hazardous Air Pollutants
 (NESHAP)..... 28

 40 CFR 63 - National Emission Standards for Hazardous Air Pollutants
 (NESHAP)..... 28

 Compliance Assurance Monitoring (CAM) 31

 Risk Management Plan (RMP) 33

 New Source Review (NSR) 33

 Greenhouse Gas (GHG) Regulation 33

4. GENERAL ASSUMPTIONS OF THE PERMIT..... 34

 Permit Content 34

 Federal Enforceability 35

 Gap Filling..... 35

 Future Requirements..... 36

Compliance Options.....	36
5. PERMIT ELEMENTS AND BASIS FOR TERMS AND CONDITIONS.....	36
Permit Organization.....	36
Permit Information and Attest	36
AOP Section 1 - Emission Unit Identification.....	37
AOP Section 2 - Standard Terms and Conditions	38
AOP Section 3 - Standard Terms and Conditions for NSPS and NESHAP	38
AOP Section 4 Generally Applicable Requirements	38
AOP Section 5 - Specifically Applicable Requirements	42
AOP Section 6 - Inapplicable Requirements.....	44
6. INSIGNIFICANT EMISSION UNITS/ACTIVITIES	44
7. DEFINITIONS AND ACRONYMS.....	76
8. AOP RENEWAL 3	79
Permit Changes in the Third AOP Renewal	79
Public Comment Period on Draft Permit	80
EPA Review on Proposed permit	81

PERMIT INFORMATION

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1. INTRODUCTION

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.

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. NASWI also includes an alternative landing field in the Coupeville area and wetlands marsh in the Greenbank area (where it was formerly used as an aerial bombing training site). The Coupeville and Greenbank sites are not included in this AOP.



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 gas station, 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. The Seaplane Base was incorporated into the AOP during the second AOP renewal because the properties, while not contiguous, are under the same ownership and operational control.

Regulated air pollutants as defined in Washington Administrative Code (WAC) 173-401, are emitted from NASWI at actual rates that are less than the Title V applicability thresholds¹. However, NASWI has the potential to emit (PTE) these pollutants at rates that are greater than the Title V thresholds except for particulates (PM) and sulfur dioxide (SO₂). The PTE PM and SO₂ is less than the 100 tpy threshold because there are no stationary emission units with a high potential for these pollutants. The larger combustion units at NASWI such as the CHP boilers burn natural gas as a primary fuel. Natural gas burns clean with very little PM and SO₂ emitted per volume of fuel consumed compared to other type of fuel such as diesel. There are a large number of diesel-fired emergency generators at NASWI that have higher potential to emit PM and SO₂. However, the annual PTE for the generator engines is constrained as a practical matter from being in dedicated emergency service.

Combustion units are sources NO_x and CO emissions. Cleaning and coating operations account for the vast majority of VOC and hazardous air pollutant (HAP) emissions. NASWI is considered to have enough unused capacity from these emission sources that their PTE would exceed Title V thresholds. For example, spray painting booths could be operated for more hours, and additional cleaning and painting activities could be done inside the numerous aircraft hangars located at the base.

Table 1-1 presents actual emissions in calendar 2017 as compared to the Title V applicability thresholds that are based on potential to emit. NASWI is considered a Title V applicable facility for CO, NO_x, VOC and HAPs due to its PTE for these pollutants.

¹ Title V thresholds are 100 tpy for particulates, SO₂, CO, NO_x and VOC, 25 tpy for a combination of HAPs and 10 tpy for a single HAP.

Table 1-1: Actual Emissions verse Title V thresholds based on PTE

Pollutant	2017 (tpy)	Title V Threshold (tpy)	PTE > Title V Threshold?
PM ₁₀	8	100	No
SO ₂	0.0	100	No
CO	10	100	Yes
NO _x	12	100	Yes
VOC	34	100	Yes
HAP (single/total)	3.0/5.9*	10/25	Yes

* HAP emissions based on 2016 emission inventory with ethylene glycol the highest single HAP.

2. FACILITY DESCRIPTION

General Facility Description

The NASWI installation is one of the larger naval installations in the Pacific Northwest. NASWI supports the MH-60R Seahawk helicopter, EA-18G Growler, P-3C Orion, P-8 Poseidon, EP-3E ARIES II and C-40 Clipper aircraft. The P-3C Orion turbo-prop aircraft is currently being phased out with new P-8 Poseidon jet engine aircraft. In all, there are approximately 18 active duty squadrons and 2 ready reserve squadrons stationed 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 (CHP) which consisted of three boilers with a total capacity of 169 million British thermal units per hour (MMBtu/hour) 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/hour boiler at the CHP. 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 the CHP occurred in 1996, when two of the older boilers (non-permitted, "grand-fathered" boilers) were removed and two 54.8 MMBtu/hour natural gas fired boiler with Jet A as a backup fuel. During the 1996 project, the older 59.65 MMBtu/hour boiler's backup fuel was switched to Jet A fuel, which at that time had a lower sulfur content than the No. 2 fuel oil.

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, odors and other potentially nuisance emissions. The next section describes these emission units and activities in more detail.

Boilers

Boilers located throughout base supply steam and hot water for indoor space heating. Table 2-1 lists boilers at NASWI, along with the information necessary to determine applicability of the Boiler MACT (40 CFR 63 Subpart DDDDD). The table also contains information used to determine if the boiler qualifies as an insignificant emissions unit (IEU). A boiler qualifies as an IEU if it is not subject to the Boiler MACT and it is a hot water heater with a heat input capacity of less than 1.6 MMBtu/hour when firing on a liquid fuel or less than 5 MMBtu/hour when firing on a gaseous fuel (see footnotes 1 and 2 to the table). All boilers that are considered IEUs are listed in Section 6.

Table 2-1 Boilers

Unit ID	Location	MMBtu /hour	Fuel	Install Year	MACT New/ Exist.	Temp?	R&D?	Steam or Hot Water?	Hot Water Heater <1.6 MMBtu/hour	Boiler MACT Applies?
Ault Field										
BOI-0384-04	CHP	59.65	Natural gas/Jet A backup	1987/1988	Existing	No	No	Steam	No	Yes
BOI-0384-06	CHP	54.80	Natural gas/Jet A backup	1996	Existing	No	No	Steam	No	Yes
BOI-0384-07	CHP	54.80	Natural gas/Jet A backup	1996	Existing	No	No	Steam	No	Yes
BOI-0993-02	Hospital	7.05	Natural gas/ULSD backup	2017	New	No	No	Hot Water	No	Yes
BOI-0993-03	Hospital	3.0	Natural Gas	2017	New	No	No	Hot Water	No	Yes
BOI-0993-04	Hospital	3.0	Natural Gas	2017	New	No	No	Hot Water	No	Yes
BOI-2549-01	Auto Hobby	2.25	Propane	1996	Existing	No	No	Hot Water	No	Yes
BOI-2837-01	Survival pool	2.10	Natural Gas	2003	Existing	No	No	Hot Water	No	Yes
BOI-2973-01	P-8 Trainer Facility	2.00	Natural Gas	2015	New	No	No	Hot Water	No	Yes

Unit ID	Location	MMBtu /hour	Fuel	Install Year	MACT New/ Exist.	Temp?	R&D?	Steam or Hot Water?	Hot Water Heater <1.6 MMBtu/hour	Boiler MACT Applies?
BOI-0386-01	Hangar 5	1.50	Natural Gas	2008	Existing	No	No	Hot Water	Yes	No ²
BOI-0386-02	Hangar 5	1.50	Natural Gas	2008	Existing	No	No	Hot Water	Yes	No ²
BOI-0108-01	Admin. building	1.01	Propane	2008	Existing	No	No	Steam	No	Yes
BOI-3001-01	Tactical Operations Center	1.00	Natural Gas	2016	New	No	No	Hot Water	Yes	No ²
BOI-3001-02	Tactical Operations Center	1.00	Natural Gas	2016	New	No	No	Hot Water	Yes	No ²
BOI-0112-01	Hangar 1	0.94	Natural Gas	2006	Existing	No	No	Steam	No	Yes
BOI-2903-01	P-3 wash rack	0.90	Natural Gas	2008/2010	Existing	No	No	Hot Water	Yes	No ²
BOI-2903-02	P-3 wash rack	0.90	Natural Gas	2008/2010	Existing	No	No	Hot Water	Yes	No ²
BOI-2903-03	P-3 wash rack	0.90	Natural Gas	2008/2010	Existing	No	No	Hot Water	Yes	No ²
BOI-2903-04	P-3 wash rack	0.90	Natural Gas	2008/2010	Existing	No	No	Hot Water	Yes	No ²
BOI-2593-01	Flight Simulator	0.75	Natural Gas	2015	New	No	No	Hot Water	Yes	No ²
BOI-2593-02	Flight Simulator	0.75	Natural Gas	2015	New	No	No	Hot Water	Yes	No ²
BOI-0410-01	Hangar 6	0.70	Natural Gas	2015?	New	No	No	Hot Water	Yes	No ²

Unit ID	Location	MMBtu /hour	Fuel	Install Year	MACT New/ Exist.	Temp?	R&D?	Steam or Hot Water?	Hot Water Heater <1.6 MMBtu/ hour	Boiler MACT Applies?
BOI-0410-02	Hangar 6	0.70	Natural Gas	2015?	New	No	No	Hot Water	Yes	No ²
BOI-2544-01	Hangar 7	0.65	Natural Gas	2005/2008	Existing	No	No	Hot Water	Yes	No ²
BOI-2544-02	Hangar 7	0.65	Natural Gas	2005/2008	Existing	No	No	Hot Water	Yes	No ²
BOI-2734-01	Passenger terminal	0.65	Natural Gas	2006/2008	Existing	No	No	Hot Water	Yes	No ²
BOI-2837-02	Survival pool	0.65	Natural Gas	2003	Existing	No	No	Hot Water	Yes	No ²
BOI-2641-02	PSD	0.63	ULSD	2010	New	No	No	Hot Water	Yes	No ¹
BOI-0423-01	Weapons	0.60	ULSD	1990	Existing	No	No	Hot Water	Yes	No ¹
BOI-2980-01	Hangar 14	0.5	Natural Gas	2017?	New	No	No	Hot Water	Yes	No ²
BOI-2980-02	Hangar 14	0.5	Natural Gas	2017?	New	No	No	Hot Water	Yes	No ²
BOI-2771-01	Tactical Support Center	0.45	Natural Gas	1994/1995	Existing	No	No	Hot Water	Yes	No ²
BOI-2758-02	Aviation Physiology	0.4	Natural Gas	2015	New	No	No	Hot Water	Yes	No ²
BOI-2836-03	P-3 support	0.26	Natural Gas	2014	New	No	No	Hot Water	Yes	No ²
BOI-2836-01	P-3 support	0.25	Natural Gas	2002/2003	Existing	No	No	Hot Water	Yes	No ²

Unit ID	Location	MMBtu /hour	Fuel	Install Year	MACT New/ Exist.	Temp?	R&D?	Steam or Hot Water?	Hot Water Heater <1.6 MMBtu/hour	Boiler MACT Applies?
BOI-0420-01	Water Office	0.23	Propane	1998/1999	Existing	No	No	Hot Water	Yes	No ²
BOI-2897-01	Firehouse	0.21	Natural Gas	2007	Existing	No	No	Hot Water	Yes	No ²
BOI-2897-02	Firehouse	0.21	Natural Gas	2007	Existing	No	No	Hot Water	Yes	No ²
BOI-2970-01	Flight Simulator	0.15	Natural Gas	2015	New	No	No	Hot Water	Yes	No ²
BOI-2644-01	NMCI	0.13	ULSD	2009	Existing	No	No	Hot Water	Yes	No ¹
Seaplane Base (SPB)										
BOI-0022-01	Ware-house	2.20	Natural Gas	1990	Existing	No	No	Steam	No	Yes
BOI-0013-01	Thrift shop	1.60	Natural Gas	1978	Existing	No	No	Steam	No	Yes
BOI-0017-01	Naval Exchange	1.01	Natural Gas	1998	Existing	No	No	Steam	No	Yes
BOI-2826-02	SPB Navy Lodge	1.0	Natural Gas	2002	Existing	No	No	Hot Water	Yes	No ²
BOI-0012-01	PBY museum	0.94	Natural Gas	1978	Existing	No	No	Steam	No	Yes
BOI-2826-01	SPB Navy lodge	0.4	Natural Gas	2001/2002	Existing	No	No	Hot Water	Yes	No ²
BOI-2938-01	Child Develop. Center	0.33	Natural Gas	2010	Existing	No	No	Hot Water	Yes	No ²

Unit ID	Location	MMBtu /hour	Fuel	Install Year	MACT New/ Exist.	Temp?	R&D?	Steam or Hot Water?	Hot Water Heater <1.6 MMBtu/hour	Boiler MACT Applies?
Portable										
BOI-0124-02	Portable	2.94	ULSD	1978	Existing	Yes	No	Steam	No	No ³
<p>¹ MACT exemption basis - Hot water boiler rated less than 1.6 MMBTU/hour; Unit is also IEU based on WAC 173-401-533 (2) (g) Combustion source, of less than one million Btu/hour, if using kerosene, No. 1 or No. 2 fuel oil.</p> <p>² MACT exemption basis - Hot water boiler rated less than 1.6 MMBTU/hour; Unit is also IEU based on WAC 173-401-533 (2) (e) Combustion source less than five million Btu/hour-, exclusively using natural gas, butane, propane and/or LPG.</p> <p>³ MACT exemption basis – Temporary unit.</p>										

Cleaning and Coating 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 3. Equipment and operations that are potentially regulated by Subpart GG are presented below.

Cleaning operations:

- Cleaning operations include hand-wipe cleaning activities, spray gun cleaning and flush cleaning (i.e., parts washers).

Primer, topcoat and specialty coating operations:

- Coating operations using primers, topcoats and specialty coatings are regulated under Subpart GG. Coating activities at NASWI include both NESHAP and non-NESHAP regulated activities and may occur in a spray booth or in hangars. If the activity occurs in a hangar, the activity is either exempt under Subpart GG, e. g., roll-on, aerosol can, marking pen, or the coating does not contain an inorganic HAP such as chromium that is required to be controlled with filtration.
- The following paint booths are located at NASWI.

Fleet Readiness Center Northwest (FRCNW) Water Wash Paint Booths (BTH-2547-02 and BTH-2547-03) – These two booths are located at the FRCNW 51B Workcenter and use a water wash system to control emissions. They were installed in 1985 and are typically used for painting wheels, aircraft parts, and other miscellaneous parts. There are two gun cleaners (CLN-2547-11 and CLN-2547-12) located in Building 2547 by the water wash paint booths.

FRCNW Composite Shop Booth (BTH-2818-01) – This booth is located at the FRCNW 51F Workcenter and used a three-stage dry filter system to control emissions. The booth was originally installed at the FRCNW in 1976. The booth was relocated to the FRCNW Composite Shop (Building 2818) and retrofitted with the three stage dry filter system in 2005. The booth is typically used for painting non-structural aircraft pods that are comprised of mostly composite material. There is one gun cleaner (CLN-2818-01) located in Building 2547 by the composite shop booth.

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.

Activities at NASWI that are not subject to Aerospace NESHAP

Steel-shot abrasive blast booth (RBL-0995-01) was approved under Order of Approval to Construct (OAC) 755a. The blasting booth is located at 900 Division and used to clean ground support equipment. Cleaning and painting ground support equipment is not subject to Aerospace NESHAP.

There are a number of glove box abrasive blast units (glove box blasters) at NASWI 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 requirements of the Aerospace NESHAP. Glove box blasters event indoors are therefore not subject to NSR under NWCAA Section 300. In

addition, glove box blasters may be considered IEUs because of their low potential to emit.

In 2001, a powder coating booth (PCB-0995-01) was installed at 900 Division in Building 995. In 2013, the original powder coating booth was replaced with a new powder coating booth (PCB-0995-02). An OAC was not required for the new booth because it vents indoors and is not subject to the Aerospace NESHAP. The powder coating booth is equipped with dry filters to control emissions. Parts painted in the booth are cured in a natural gas fired curing oven (FRN-0995-01). The building also contains a natural gas fired pyrolysis cleaning furnace (FRN-0995-02) and an abrasive blast booth (RBL-0995-01). NASWI does not process any aerospace equipment in Building 995 using the aforementioned equipment. Therefore, the operations in Building 995 are not subject to the Aerospace NESHAP.

The Transportation paint spray booth (BTH-0018-01) located at the Seaplane Base was installed in 2011 and is used to paint transportation equipment such as cars, trucks and other special-purpose Navy civil engineering support equipment. 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 is not used to paint any aerospace equipment and the booth is not subject to Aerospace NESHAP.

Common activities at NASWI not regulated under aerospace NESHAP because they do not involve HAP containing materials include;

- Flush (parts) cleaners using non-HAP solvents. Most flush cleaners at the facility use MIL-PRF-680 (Stoddard solvent) that is a hydrocarbon based solvent that contains no HAPs and this activity is exempt under 63.741(f).
- Hand wiping activities using isopropyl alcohol is a common activity in hangars when preparing portions of an aircraft for painting. Because isopropyl alcohol is not a HAP, this activity is exempt under 63.741(f).

Activities Subject to Aerospace NESHAP that are not at NASWI

- Depainting operations - Depainting is defined by in the Aerospace 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 do not apply to facilities that depaint six or less complete 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 - NASWI does not conduct chemical milling maskant application operations and Aerospace NESHAP requirements for this activity do not apply.

Gasoline Dispensing Stations

There are three gasoline dispensing stations at NASWI: two at Ault Field (the Naval Exchange (NEX) AutoPort station and the government fleet station) and one at the Seaplane Base (the NEX SPB gasoline station). Dispensing gasoline into vehicles and loading gasoline into aboveground and underground storage tanks are considered emission units. The gasoline storage tanks at NASWI are;

- Ault Field NEX gasoline dispensing station storage tanks:

- GAS-2595-01, -02, and -03 are 20,000 gallon underground storage tanks equipped with stage I vapor recovery equipment. These tanks were permitted under OAC 644a requiring stage I vapor recovery. Tank GAS-2595-03 was converted to storing diesel in 2004. The other two tanks store gasoline.
- AST-2595-08 is a 6,000-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 are 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 are 8,000-gallon unleaded gasoline aboveground storage tanks equipped for stage I vapor recovery.
 - AST-2813-03 is a 12,000-gallon unleaded gasoline aboveground storage tank equipped for stage I vapor recovery.
 - AST-2813-04 is a 10,000-gallon unleaded gasoline aboveground storage tank equipped for stage I vapor recovery.

Aircraft Engine Test Cells and Stands

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

- ETC-2525-01. The T-6 jet engine test cell was installed in 1962 to test A-6 Intruder engines and later, EA-6B Prowler engines and J-52 engines. This cell has been preserved since August 2014.

- ETC-2765-01. T-10 jet engine test cell was installed in the mid-1990s to expand the facility's capacity to test jet engines. This cell has been preserved since August 2014.
- ETC-2525-02. The T-17 engine test stand is an outdoor stand used for testing T-56 turbo jet engines. The test stand is a metal towable structure attached to the concrete foundation through a series of tie down cables, which supports an engine. The cables are attached to large steel bars imbedded in the concrete to prevent the test bed from moving during engine operations. The foundation is comprised of blocks of concrete measuring 10' by 10'. In 2012 and 2016, sections of the concrete were replaced due to unacceptable wear on the steel bars. Additionally, there is another stand, which is currently preserved and used alternately with the active stand every year. Engine start-up is managed through a small, portable, pneumatic generator known as a Huffer. The test stand is located next to the T-6 and T-10 engine test cell buildings.
- ETC-2525-03. This is an outdoor test stand used to test aircraft auxiliary power units. The auxiliary power units are rated at approximately 85 hp and run on Jet A fuel.

Stationary Reciprocating Internal Combustion Engines (RICE)

Throughout Ault Field, Area 6, and the Seaplane Base, NASWI operates and maintains many stationary² diesel-fired, compression ignition (CI) reciprocating internal combustion engines (RICE). There are also two stationary natural gas-fired, spark ignition engines. Most of these engines are used to drive emergency generators for back-up electrical power around the base, including backup power for lift stations, radar systems, communications, runway lights, building power, water pumps and other support systems. The electrical generators that provide backup power to critical and sensitive systems are paired with an uninterruptable power supply (UPS) and auto transfer switch (ATS). The UPS provides the interim power load between the time the electrical grid is interrupted and when the generator engine starts providing backup electrical power. The generator is turned on by the auto transfer switch (ATS) that signals the generator to start and switches the electrical supply to the generator during the power interruption.

There are three non-emergency, compression ignition (CI) engines at the base. Two at the compost facility in Area 6 and one at the Ault Field Recycle Center.

There is also a fire pump CI engine located at Hanger 6.

All of the stationary RICEs located at NASWI are listed in Section 1 of the AOP. The RICE Table is separated by the 40 CFR 63 Subpart ZZZZ category to which the engines falls.

The table includes the following information.

- Description, Location: This column lists the service use of the engine and where it is located. If the location does not state SPB (Seaplane Base) or Area 6, the engine is located at Ault Field.

² 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.

- ID No.: this column denotes the AOP emission unit number. ICE=internal combustion engine, WOO=wood chipper, BAL=metal baler, SCR=screener followed by – four digit building ID and – unit number.
- Notes: This column includes,
 - Engine hp – Regulatory applicability is based on the engine’s site-rated horsepower (hp), which is the maximum manufacturer’s design capacity at engine site conditions. In most cases the hp listed is based on the engine’s nameplate rating. In some cases the hp rating is unknown and has been estimated by taking the generator kW times 1.6 (assumes 80% transfer efficiency).
 - Manufactured Date – This column contains the manufactured date of the engine as indicated on the engine nameplate. For some engines, only an installation date may be available from the engine’s logbook. Order Date – Regulatory applicability is based on the date that an engine was ordered by NASWI³. Order dates in 2002 for engines > 500 hp, and 2006 for engines ≤ 500 hp are relevant for applicability determinations.
 - OAC – If an Order of Approval to Construct (OAC) has been issued for the engine, the OAC number is listed.

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 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 2007, the burning of jet fuel at the facility was eliminated and replaced by a propane-fired mobile training device. The fire training facility is considered an insignificant emission unit (IEU) and included in the list of IEU Section 6 of this Statement of Basis.

In the past, NWCAA issued fire permits to NASWI for the fire training facility. In March 1998, the underlying statute of the Washington Clean Air Act under which the outdoor fire permit program is regulated was revised to exempt aircraft crash rescue fire training from fire permit requirements. Presently, aircraft crash rescue fire training is exempt from permitting under RCW 70.94.6546. This provision also allows aircraft crash rescue training fires to contain petroleum products that are otherwise considered prohibited materials in outdoor fires.

³ 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.

Explosive Ordnance Demolition Unit

The NASWI Seaplane Base hosts the Explosive Ordnance Demolition (EOD) 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. Also, the collected Department of Defense munitions are occasionally burned at a designated burn pit, which is located in an open field 600 yards from the fenceline. 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 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.

As of AOP issuance, it is unclear why the NWCAA stopped issuing fire permits in 2013 for activities at the Explosive Ordnance Demolition Unit, and whether or not that activity is exempt from general outdoor burning requirements.

Ozone Depleting Substance 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 ozone depleting substance.

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.

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) 257-6665.

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 2-2 lists emission units at NASWI that have been permanently shutdown according to NWCAA regulation 325 since the previous AOP issuance. Details on recent equipment shutdowns are included in Table 2-2.

Table 2-2 Equipment Permanently Shutdown at NASWI

Equipment ID	Description	Associated OAC†	Effective Date of Shutdown
BOI-0993-01	Boiler	OAC 243	2017
BOI-2621-01	Boiler, 0.60 MMBtu/hour, diesel-fired - Liquid oxygen area		2017
BTH-2699-01	Paint booth	None	Before 2016
BTH-2681-01	Paint booth – Hangar 9	None	Before 2016
BTH-2547-01	Paint booth	None	2005
BTH-2547-04	Paint booth	OAC 422b	10/2011
BTH-2801-01	Paint booth	OAC 723a	2007
RBL-2547-01	Blast booth	OAC 266	2005
RBL-2801-01	Blast booth	OAC 723a	2005
CLN-0386-01	Flush cleaner – Hangar 5	None	Before 2016
CLN-0386-02	Flush cleaner – Hangar 5	None	Before 2016
CLN-2699-01	Flush cleaner	None	Before 2016
CLN-2708-01	Flush cleaner – Flying Club	None	Before 2016
WOO-2555-01	Wood chipper	OAC 586	7/2012
ICE-2707-01	Emergency generator		2017
ICE-2700-01	Emergency generator	OAC 551	2009
ICE-2700-02	Emergency generator	OAC 551	2009
ICE-2700-03	Emergency generator	OAC 551	2007

Table 2-2 Equipment Permanently Shutdown at NASWI

Equipment ID	Description	Associated OAC†	Effective Date of Shutdown
ICE-2700-04	Emergency generator	OAC 551	2005
ICE-0384-02	Emergency generator	OAC 624	2014
ICE-0385-02	Emergency generator	OAC 624	2014
ICE-2544-01	Emergency Generator		2014
BTH-0995-01	Paint booth	OAC 755a	2013
n/a	Soil Vapor Extraction	OAC 635	1999
STR-2547-01	Stripping tank		2018
STR-2547-02	Stripping tank		2018
DEG02547-01	Degreasing tank		2018
n/a	FRCNW Alodine tank		2018
ICE-0993-02	Emergency generator	OAC 551	2018

† OAC 551 includes provisions for other emergency generators still in operation and is therefore listed in the AOP. Other OACs listed in Table 2-2 are not listed in the AOP because the equipment approved under the OACs are no longer at NASWI.

BTH-2547-04 was a dry filter paint booth that was installed at FRCNW 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 was converted to a robotic arm-operated UV-cure booth for powder coating.

Emissions Inventory

NASWI 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. Actual emissions may be considerably less than the potential to emit. The primary sources of emissions are gasoline dispensing facilities, the central heating plant (CHP) boilers, cleaning and coating operations and stationary reciprocating internal combustion engines (RICE).

Table 2-3 provides a summary of recent emissions from the facility as provided in annual emissions inventories submitted to NWCAA.

Table 2-3 Criteria Air Pollutant Emissions in Tons per Year

Pollutant	2014	2015	2016	2017
PM ₁₀	15	6	5	5
SO ₂	2	0.3	0.4	0.5
CO	12	8	9	10
NOx	8	7	9	12
VOC	30	30	52	35
Total HAPs	1.6	3.1	5.9	4.4
GHG (CO ₂)*	11,335	13,373	13,560	n/a

* Metric tons CO₂

Order of Approval to Construct (OAC) History

The NWCAA issues Orders of Approval to Construct (OAC) for the new or modified emission units at NASWI. An OAC is issued under the authority of Section 300 of the NWCAA Regulation. The OAC requires that the facility employ control strategies and associated monitoring, recordkeeping and reporting. The requirements in an OAC are considered federally enforceable and incorporated into the AOP as specifically applicable requirements. OACs issued to NASWI are summarized in chronological order below.

OAC dated September, 13 1984 (9/13/84) – 59.65 MMBtu/hour CHP Boiler (BOI-0384-04). This is a natural gas fired boiler with oil backup located at the Central Heating Plant (CHP). The OAC is considered narrative with no enforceable requirements and the OAC does not appear in the AOP. The original Notice of Construction (NOC) application for the OAC stated that a boiler heat input capacity of 49 MMBtu/hour. However, information submitted under the Boiler MACT regulation and in O/M manuals for the boiler states 59.65 MMBtu/hour and this is the heat rate capacity listed in the AOP.

OAC 243 (4/18/88) – 8.4 MMBtu/hour Hospital Boiler (BOI-0993-01). This natural gas fired boiler with oil backup provided steam to heat the hospital until it was replaced with three hot water boilers approved under OAC 1282a. OAC 243 was removed from the AOP during the 2018 AOP renewal following the 8.4 MMBtu/hour Hospital Boiler being decommissioned in February 2017.

NOC 260 (11/16/89, no OAC issued) – T-10 engine test cell (ETC-2765-01). The NWCAA received a Notice of Construction (NOC) for this engine test cell in 1989. Upon review, agency staff presented a recommendation to its Board of Directors on November 16, 1989 to approve the project with conditions including a 20% opacity limit and keeping records of engine testing activities. These requirements were included in the AOP upon initial issuance. During the 2018 AOP renewal process, the agency determined that an OAC was never issued for this project and that the November 16, 1989 recommendation to the NWCAA Board is not an enforceable document because it was not issued to NASWI. References to OAC 260 and its requirements were removed from the AOP in the 2018 renewal.

OAC 528a (3/4/96) – Emergency electrical generators (ICE-2772-01 and -02). This project involved installation of two new emergency 500 Kw electrical generators at the Tactical Support Center. The original OAC was issued on March 29, 1995 to cover one generator. The OAC was revised to OAC 528a on March 4, 1996 for two identical generators.

The OAC limits visible emissions to 10% opacity using Ecology Method 9A, the diesel fuel sulfur content to 500 ppm (0.05 % by weight) and limits operating time to 4,000 hours per year. The NWCAA was notified of final installation of the generators in a letter dated February 20, 1996. This OAC is incorporated into the AOP with the exception of Condition 1. Condition 1 requires that the project to be constructed in accordance with the NOC application and the agency has determined that this one-time only requirement has been met.

OAC 551 (5/1/95) – Emergency electrical generators (ICE-0382-01). This OAC approved the installation of 9 diesel-fired emergency generator engines requiring limits on visible emissions, the sulfur content of the fuel and annual run time hours. Of the 9 engines approved under this OAC (ICE-0382-01, ICE-0385-01, ICE-0976-01, ICE-0993-02, ICE-2508-02, and ICE-2700-01 through -04) all have been permanently shutdown except ICE-0382-01, located at the galley. OAC 551 is incorporated into the AOP for ICE-0382-01 with the exception of Condition 1. Condition 1 requires that the project to be constructed in accordance with the NOC application and the agency has determined that this one-time only requirement has been met.

OAC 583 (4/11/96) – Emergency electrical generator (ICE-2796-01, formerly ICE-2614-01). The OAC approved installation of a 250 kW diesel-fired emergency generator at the wastewater treatment plant. Conditions in the OAC limit fuel sulfur content, opacity and hours of operation. The OAC is incorporated into the AOP with the exception of Condition 1. Condition 1 requires that the project to be constructed in accordance with the NOC application and the agency has determined that this one-time only requirement has been met.

OAC 586 (4/11/96) – 460 hp wood chipper engine (WOO-2555-01). OAC 586 approved the installation of a wood chipper at the compost facility. This wood chipper was powered by a 460 hp diesel engine. The wood chipper was replaced in 2011 with a new wood chipper. The new wood chipper was approved under OAC 1100. Because the equipment approved under OAC 586 is no longer at the facility, this OAC is not included in the AOP.

OAC 593 (6/24/96) – Metal baler (BAL-2555-01). This OAC was issued on June 24, 1996 for the diesel-fired engine associated with the metal baler at the recycle center. OAC 593 limits engine fuel sulfur content and opacity from the engine.

OAC 594 (11/27/96)– 54.8 MMBtu/hour 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/hour natural gas heat input and 53.5 MMBtu/hour jet fuel heat input. Jet A is used as backup fuel in the boilers so the permit lists the boilers heat input capacity as 54.8 MMBtu/hour. The OAC limits Jet A sulfur content to 0.3% by weight and the volume of liquid 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 boilers are subject to 40 CFR 60 Subpart Dc, which is described further under the NSPS section of this document.

OAC 624 (7/14/97) – 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 and replaced by emergency generators that did not require an OAC. OAC 624 was removed from the permit during the 2015 AOP revision.

OAC 642 (1/6/98) – Emergency electrical generator (ICE-0198-02). OAC 642 was issued on January 6, 1998 approving installation of a 350 kW diesel-fired, emergency electrical generator. The order limits hours of operation, visible emissions, and sulfur content of fuel.

OAC 644a (10/29/09) – 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 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 (AST-2595-08), 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 (1/24/98) – Government fleet gasoline station. OAC 450b was issued for the Ault Field government fleet gasoline station on October 5, 1993. OAC 646 was issued on January 24, 1998 superseding OAC 450b. OAC 646 establishes requirements for the stage I vapor recovery system on the two underground gasoline storage tanks (GAS-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. OAC 646 requires that stage I equipment be maintained and operated in accordance with state and local rules as defined in WAC 173-491 and NWCAA section 580.

OAC 755a (1/30/04) – Powder coating spray booth (BTH-0995-01), powder coating curing oven (FRN-0995-01), and controlled pyrolysis cleaning furnace (FRN-0995-02). OAC 755 was issued March 8, 2001 approving installation of a powder coating booth, an abrasive blast booth, a curing oven, and a pyrolysis cleaning furnace. The OAC approved the equipment for preparing and painting ground support equipment only. Revision OAC 755a was issued January 30, 2004 to allow powder coating activities to occur on aerospace applicable equipment in addition to ground support equipment. However, the OAC prohibits the blast booth to be used on Aerospace NESHAP applicable parts. Because NASWI does not process any aerospace equipment in Building 995 using the emission units approved under OAC 755a, none of the OAC conditions related to Aerospace NESHAP are included in the AOP, e.g., OAC 755a Condition 13.

In 2013, BTH-0995-01 was replaced by BTH-0995-02. BTH-0995-02 is an indoor venting powder coating booth is used for painting ground support equipment.

OAC 987 (1/5/07) – Infrared Heaters for Hangars 6, 8, and 10 (IRH-0410-01-16, IRH-2642-01-16, and IRH-2699-01-02). 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/hour, which is below the 10 MMBtu/hour 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 (2/1/07) – Emergency generator (ICE-2508-03). 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 (2/25/08) – Boilers (BOI-0386-01&02), hot water heaters (WHT-0386-01-07), and infrared heaters (IRH-0386-01-08)for Hangar 5. The total aggregate heat input of this hangar heating system upgrade was 11.57 MMBtu/hour, 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/hour) 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 (10/16/08) – 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.

OAC 1081 (1/25/11) – SPB Transportation Maintenance Paint Booth (BTH-0018-01). This automotive paint spray booth was installed at the Seaplane Base (SPB) 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 (9/9/11) – Wood chipper (WOO-2555-02). During the June 29, 2011 site inspection of NASWI, 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). 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 (8/20/12) – Paint Spray Booth (BTH-2818-01). This booth was installed at NASWI in 1976 and relocated in 2005 to its currently located at the FRCNW Composite Shop. The booth 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. The filter upgrade required by CO 5 triggered new source review and OAC 1131 was issued on August 20, 2012 for the project. The OAC requires properly certified and installed filters and differential pressure gauge across each of the three filter banks with pressure readings taken during each painting shift.

OAC 1282a (7/18/17) – 7 MMBtu/hour Boiler (BOI-0993-02), 3 MMBtu/hour Boiler (BOI-0993-03) and 3 MMBtu/hour Boiler (BOI-0993-04). The OAC was issued June 12, 2017, and revised on July 18, 2017. The OAC establishes visual emission standards and fuel limitations on the three new boilers. These are hydronic boilers that produce hot water for heating the hospital. The boilers are fired on natural gas, with the option of combusting ULSD as backup fuel in the largest boiler BOI-0993-02. The one-time only requirement of OAC 1282a Condition 4 was completed for the two 3 MMBtu/hour boilers with a startup notice received by the agency on September 7, 2017, and a startup notice for the 7 MMBtu boiler received on April 20, 2018. Boiler MACT requires that a tune-up be completed on the hospital boilers every five years following startup. The agency received an initial Boiler MACT NOCS report for the three hospital boilers on April 19, 2018 via CEDRI. The three hospital boilers approved under OAC 1282a replaced a single 8.4 MMBtu/hour hospital boiler (BOI-0993-01) approved on under OAC 243 in 1988 that was decommissioned and removed from the hospital on February 13, 2017.

Compliance History

NASWI is required to notify the NWCAA when excess emissions are released to the atmosphere and when the facility deviates from AOP monitoring, recordkeeping and reporting requirements. Agency staff also conducts onsite inspections and record reviews to evaluate the facility's compliance status. Incidents where the agency determine that excess emissions or deviations of monitoring, recordkeeping or reporting warrant enforcement action, a notice of violation (NOV) is issued. When formal enforcement action the NOV is followed with a monetary penalty and/or regulatory order to resolve the issue. If the violation is determined to be a High Priority Violation (HPV) under EPA guidance, the enforcement status is tracked in EPA's national Aerometric Information Retrieval System (AIRS) database until the enforcement action is fully resolved.

At the time of this permit issuance, no violation noticed have been issued within the past five years. This is due in part to Resolution No. 320 approved March 11, 2004, by the NWCAA Board of Directors preventing the agency from imposing monetary penalties on NASWI. The resolution was passed due to litigation at that time in the matter of Congress and its ability to waive sovereign immunity of federal agencies from state and local monetary penalties. On September 8, 2016, the NWCAA Board of Directors approved Resolution No. 451 revoking Resolution No. 320 after litigation on this matter had been

resolved. Following approval of Resolution 451, agency is again empowered to levy monetary penalties against NASWI for air quality related violations.

Compliance Reports

NASWI submits semiannual and annual reports 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 calendar month in which the deviation was discovered. Semiannual and annual reports are certified by the NASWI responsible official that include statements regarding the truth and accuracy of the information in each report. The annual AOP certification includes term by term determinations as to whether the facility was in continuous or intermittent 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/hour 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 numerous diesel 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 and 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 Central Heating Plant 54.8 MMBtu/hour boilers (BOI-0384-06 and -07) because the boilers have a maximum design heat input between 10 and 100 MMBtu/hour and they were constructed after June 9, 1989. The boilers primarily combust natural gas and occasionally combust Jet A fuel. Jet A 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 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. There are over 50 engines at NASWI subject to 40 CFR 63 Subpart ZZZZ, that requires new engines to meet the requirements of 40 CFR 60 Subpart IIII. In general, 40 CFR 63 Subpart ZZZZ requires that newer, smaller engines comply with 40 CFR 60 Subpart IIII. Subpart IIII requires a non-resettable run time meter for engines that are used for emergency service that do not meet the standards for engines in non-emergency service. There is no indication that the emergency engines at NASWI cannot meet non-emergency standards, so the Subpart IIII requirement to have a

run time meter is not in the AOP. The other provisions of Subpart IIII including fuel quality, emission standards, and duty to comply are listed in the AOP.

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 broad scope of potential cleaning and painting 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.

All of the Aerospace NESHAP activities occur at Ault Field and most occur within the Fleet Readiness Center (FRCNW).

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)⁴ located at major and area sources of HAP emissions. This subpart applies to each “affected source”, which consists of any existing, new, or reconstructed stationary RICE, excluding those being tested at a stationary test cell/stand.

Most of the engines at NASWI are diesel-fired, compression-ignition (CI) engines with the exception of two being spark-ignition (SI) engines fired on natural gas. The engines are listed in the AOP under the following Subpart ZZZZ categories each with its specifically applicable requirements. “Existing” under Subpart ZZZZ means constructed (i.e., installed) before June 12, 2006 and “new” means constructed on or after June 12, 2006 for engines ≤ 500 hp. For engines > 500 hp, “new” means constructed before December 19, 2002 and “existing” on or after December 19, 2002.

Non-emergency, CI engines:

- Existing, non-emergency, CI engine $100 \leq \text{hp} \leq 300$ hp located at a major source of HAP
- New, non-emergency CI engine ≤ 500 hp located at a major source of HAP

Emergency, CI engines:

- Existing, emergency, CI engine > 500 hp located at a major source of HAP
- New, emergency, CI engine > 500 hp located at a major source of HAP
- Existing, emergency, CI engine ≤ 500 hp located at a major source of HAP
- New, emergency, CI engine ≤ 500 hp located at a major source of HAP

Fire Pump, CI engines:

- New, fire pump, CI engine ≤ 500 hp located at a major source of HAP

Emergency, SI engines:

- Existing, emergency, SI engine ≤ 500 hp located at a major source of HAP

⁴ 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.

Under Subpart ZZZZ 63.6640(f) emergency engines at a major source of HAPs are allowed to operate for up to 100 hours in a calendar year for maintenance checks, readiness testing, emergency demand response, or when there is a voltage or frequency deviation of >5%. NASWI does not operate emergency engines for emergency demand response as described in 63.6640(f)(2)(iii).

Up to 50 of those 100 hours may be used for other non-emergency purposes provided they are not used for peak shaving, non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity as prohibited by 63.6640(f)(4).

There are no limits on the number of hours that emergency engines can operate in emergency service.

Subpart ZZZZ does not have any recordkeeping of run time hours for emergency engines larger than 500 hp, even though the rule limits the number of run time hours these engines can operate in non-emergency service each calendar year. The AOP has been gap-filled to require recordkeeping of run time hours for engines greater than 500 hp consistent with Subpart ZZZZ recordkeeping provisions for engines equal to or less than 500 hp.

There are four diesel-fired, emergency generators at NASWI that support critical equipment related to aircraft flight operations (e.g., control tower, radars). Loss of electrical power to critical equipment can result in the inability to provide safe flight services to military and civilian aircraft. Loss of systems can result in the need to divert aircraft which incurs cost and risk. Furthermore, if the power to NASWI's critical infrastructure is interrupted for a brief moment, a comprehensive critical systems restart is required which takes in excess 30 minutes for the system to be operational and up to an hour to be fully operational, assuming there were no equipment casualties caused by the power interruption. Power interruptions at NASWI significantly increase risk of damaging sensitive equipment; can violate flight safety requirements; and increases the potential for injury to personnel and residents at NASWI and in the adjacent community. Additionally, as a hub of the Federal Aviation Administration, the Washington Area Defense Sector, and the Border Patrol infrastructure, an impact to the critical infrastructure at NASWI can impede the primary missions of these agencies by breaking their connection to air surveillance systems at NASWI and other remote stations, which they require to protect national interests and manage civil air traffic in a 50 nautical mile radius around NASWI.

The four emergency diesel generators that support critical equipment related to aircraft flight operations are listed in Section 1 of the AOP with the following notation.

"This generator supports critical equipment and is operated during conditions that are likely to cause a power interruption (e.g. inclement weather) when the UPS or ATS is considered unreliable."

In accordance with Department of the Navy (DON) directives, NAS Whidbey Island is required to use a generator that supports mission essential operations and facilities inclement weather events (including at least 30 minutes before severe weather and/or wind gust speed nearing or exceeding 35 knots (40 mph) is anticipated) if either the UPS or auto-switching capability is unavailable. In the past, NASWI has experienced a series of power interruptions and/or outages under inclement weather events.

The four emergency diesel generators that support critical equipment related to aircraft flight operations are operated during inclement weather when UPS or ATS equipment

associated with that generator or the critical equipment that that generator supports is considered unavailable or unreliable. Therefore, the AOP has been gap-filled for these four engines with directly enforceable requirements to track UPS and ATS maintenance and repair records and to track the number of hours that the engine runs without UPS or ATS systems available.

40 CFR 63 Subpart ZZZZ includes specific requirements for engines that are controlled by diesel particulate filters. None of the stationary RICE located at NASWI are equipped with diesel particulate filters so those requirements are not listed in the AOP.

40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

40 CFR 63 Subpart DDDDD applies to industrial, commercial, or institutional boilers that are located at a major source of hazardous air pollutants. The rule is commonly referred to as the Major Source Boiler MACT, or simply Boiler MACT. There are 11 existing and 3 new boilers at NASWI subject to 40 CFR 63 Subpart DDDDD. Table 2-1 in Section 2 delineates Boiler MACT applicability. In addition, there are a numerous small boilers listed as insignificant emission units (IEUs) in Section 6. All boilers considered IEUs at NASWI have heat input capacities of less than 1.6 MMBtu/hour.

An initial Boiler MACT Notification of Compliance Status (NOCS) required under 63.7545(b) was received on April 18, 2016. The notice lists all of their subject boilers as "existing" because they were constructed prior to the June 4, 2010 applicability date. They are also classified as "gas 1" because they combust natural gas or propane as their primary fuel. Subpart DDDDD does not require any pollutant-specific emission limits for boilers designed as gas 1. Instead, it requires work-practice standards involving an initial energy assessment for existing boilers and periodic tune-ups on each boiler.

All three boilers at the Central Heating Plant and the 7 MMBtu/hour Bryan Boiler at the hospital are equipped with oxygen trim. Under Boiler MACT, boilers > 5 MMBtu/hour that are equipped with oxygen trim must be tuned-up every five years instead of annually.

As required under Item 4 of Table 3 to Subpart DDDDD, the NASWI utilizes an ISO 50001 compatible energy improvement program in lieu of a one-time energy assessment for their boilers. Notice that NASWI complied in this manner was received by the NWCAA by email on October 13, 2015. The notice was due on January, 31, 2016.

Compliance Assurance Monitoring (CAM)

40 CFR 64 – Compliance Assurance Monitoring: Sources subject to CAM must conduct air pollution control system monitoring to assurance of compliance with emission standards. The rule establishes specific monitoring criteria for emission units that are subject to the rule. In accordance with §64.2, subject emission units that meet all three of the following applicability criteria.

- (1) Use an active air pollution control device to meet an emission limit.
- (2) The emission limit is not from a NSPS and NESHAP proposed after November 15, 1990.
- (3) The emission unit has an uncontrolled potential to emit that exceeds the Title V major source threshold (e. g., 100 tpy NO_x).

Table 3-1 lists the emission unit categories present at NASWI with a description as to why that category is not subject to CAM.

Table 3-1: CAM Applicability Determination

Emission Unit Category	Control Device	Emission Limit met with Control Device	Subject to CAM?
Aircraft Engine Test Cells	None – Not subject to CAM	Not applicable	Not applicable
Composting Facility	Biofilter	None – Not subject to CAM	Not applicable
Boilers	None – Not subject to CAM	Not applicable	Not applicable
Reciprocating Engines	None – Not subject to CAM	Not applicable	Not applicable
Gasoline Dispensing Facilities	Stage I vapor recovery	None – Not subject to CAM	Not applicable
Steel-shot Abrasive Blast Booth (RBL-0995-01)	Fabric Filter	PM ₁₀ 0.01 gr/dscf (OAC 755a) and 0.10 gr/dscf (NWCAA 455.1)	No, uncontrolled PM ₁₀ < 100 tpy ¹
FRC Paint Booths (BTH-2547-02 & BTH-2547-03)	Water wash	PM ₁₀ 0.10 gr/dscf (NWCAA 455.1)	No, uncontrolled PM ₁₀ < 100 tpy ²
Composite Shop Paint Booth (BTH-2547-03)	Fabric filtration	PM ₁₀ 0.10 gr/dscf (NWCAA 455.1)	No, uncontrolled PM ₁₀ < 100 tpy ²
Transportation Maintenance Shop Paint Booth (BTH-2818-01)	Fabric filtration	PM ₁₀ 0.10 gr/dscf (NWCAA 455.1)	No, uncontrolled PM ₁₀ < 100 tpy ²

Table Notes:

1. The steel-shot abrasive blast booth has an uncontrolled PTE of 81 tpy PM₁₀ based on a nozzle rating of 1,856 lb blast media/hour and an emission factor of 20 lb PM₁₀/ton for metal grit blast media⁵. The booth uses only steel-shot as a blast media. According to AP-42, the emission factor for metal shot is lower than that of steel grit.
2. The spray booth has an uncontrolled PTE of 7.6 tpy PM₁₀ assuming a paint spray rate of 0.55 gallons/hour, paints with solids content of 9 lb/gallon and an overspray factor of 35%.

In summary, there are no emission units at NASWI subject to the CAM rule because no emission unit meets all of the applicability criteria required under §64.2.

⁵ South Coast Air Quality Management District Permit Processing Handbook, Section 2, Unconfined abrasive blasting, 8/89 for grit used as abrasive blast media as referenced in the NOC application for OAC 755.

Risk Management Plan (RMP)

40 CFR 68 – Chemical Accident Prevention Provisions: The goal of 40 CFR 68 and the Risk Management Program (RMP) is to prevent the accidental release of substances that can cause serious harm to the public and the environment and to mitigate the severity of releases if they 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 is required to develop and implement a risk management program.

NASWI is not subject to the provisions of this program at the time of permit renewal. However, the requirement to submit a Risk Management Plan and to annually certify compliance under 40 CFR 68 is included in Section 2 of the permit, should the facility become subject to the regulation at a future date.

New Source Review (NSR)

New Source Review (NSR) requires approval for construction of a new or modified stationary emissions unit. There are three types of NSR permits and a facility may have been issued one or more of these approval permits.

- Prevention of Significant Deterioration (PSD) permits – These are required for new major sources or a major source making a major modification in an attainment⁶ area;
- Nonattainment NSR permits – These are required for new major sources or major sources making a major modification in a nonattainment area; and
- Minor NSR permits issued under NWCAA Section 300 are required for sources that emit pollutants less than major source thresholds but greater than minor NSR de minimis thresholds.

NASWI has been issued numerous minor NSR permits in the form of an Orders of Approval to Construct (OAC). However, no PSD or major NSR permits have been issued to the facility. Orders of Approval to Construct that apply to NASWI contain conditions to ensure emissions are controlled at a level that is considered best available control technology (BACT). The conditions have been incorporated into the AOP as specifically applicable requirements unless the order has been determined to be narrative or the order has been superseded by a more recent OAC.

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.

⁶ 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)).

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 equivalents⁷ (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. If NASWI became subject to the rule, 40 CFR 98 would be included in the air operating permit. Currently, it is not considered an AOP applicable requirement as that term is defined in WAC 173-401-200.

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 affected 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.

Chapter 173-442, Clean Air Rule (CAR)

The Clean Air Rule was promulgated in Washington state on October 16, 2016. NASWI is considered a covered party under the rule and must submit compliance reports to Ecology by the deadline prescribed in WAC 173-442-250. The rule requires reductions in GHG emissions over time if facility emissions of covered GHG exceed specific thresholds. The facility may discontinue compliance reporting under the rule following 3 consecutive years of reporting covered GHG emissions less than 50,000 metric tons of CO₂e per year and they notify Ecology of this intent. A covered party must resume submitting compliance reports when total covered GHG emissions exceed 50,000 metric tons of CO₂e per year. In general, NASWI operates at a GHG emission rate of less than 20,000 metric tons of CO₂e per year from its stationary emission units.

4. GENERAL ASSUMPTIONS OF THE PERMIT

Permit Content

The permit contains standard terms (Sections 2 and 3), generally applicable requirements (Section 4) and specifically applicable requirements (Section 5) for emission units located at NASWI. 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 of a one-time only requirement that has been satisfied is an initial notice of startup that was submitted to the agency. Another example is a requirement in an OAC to construct the project "in accordance with the plans, specifications, and other information submitted with the Notice of Construction Application for Approval". This would not be included in the AOP because it has been completed. Regulations that require action by a regulatory agency, but not of the regulated source, are not included as applicable permit conditions.

⁷ 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.

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.

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 “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 situation⁸. The permitting agency may create MR&R requirements that fill

⁸ 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.

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. 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 Air Operating Permit 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

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.

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 unit descriptions including rated capacity or size, location of the emission unit at NASWI, air pollution controls and fuel type and any OACs that apply to that emission unit. Emission units or activities are assigned an AOP specific identification number using the following nomenclature. Some IDs are used only this Statement of Basis to identify insignificant emission units or equipment that has been decommissioned or removed from the facility.

ABC-####-##.

The first set of letters describes the equipment or activity type. The second set are numbers of the building or area where the emission unit is located. The last set of numbers represents the equipment number in that is or has been in that building/area.

For example: BTH-2547-03 is a spray coating booth located in NASWI Building 2547 and is the third spray coating booth that has been installed in that building.

- ARE = Area
- AST = Aboveground storage tank
- BBL = Abrasive blast cabinet
- BKG = Jet A transfer to aircraft
- BKP = Diesel truck loading
- BKT = Gasoline loading
- BOI = Boilers
- BTH = Spray coating booth
- CHL = Chiller
- CLN = Gun or parts cleaner
- COMP = Compost equipment
- DEG = Degreasing unit
- DEI = Deicing
- ETC = Aircraft engine test cell or stand
- FIR = Fire school outdoor burn pad
- FRN = Furnace or oven
- GAS = Underground dispensing tank
- ICE = Internal combustion engine
- IRH = Infrared heater
- LAN = Landfill
- OVN = Oven

PAV = Paved roads
PCB = Powder coating booth
RBL = Steel-shot media blast booth
SAN = Sanding booth
STR = Stripping Tank
UNP = Unpaved road
UST = Underground storage tank
UVC = Ultraviolet cure
WHT = Hot water heater
WLD = Welding operation
WWT = Wastewater treatment plant

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 these federal requirements.

AOP Section 4 Generally Applicable Requirements

Introduction to AOP Sections 4 and 5

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 in the tables contains the AOP 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 (MR&R) 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.

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.

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

Section 4 - Generally Applicable Requirements 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 requirements in Section 4 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

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. Gap-filled MR&R is identified as “Directly Enforceable”.

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 has 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 requires that the facility 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.

Visible Emission Standards

The generally applicable visible emission (VE) requirements limit emission units 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 have a certified opacity observer 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/hour 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

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

Combustion units (e.g., engines and boilers) are sources of sulfur dioxide emissions. The Central Heating Plant (CHP) boilers are limited by conditions specified in the AOP to burn either natural gas or Jet A 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% by weight), or ultra-low sulfur diesel (15 ppm by weight).

Sulfur Dioxide Standards, Stack Emissions

These permit terms limit emissions to 1,000 parts of sulfur dioxide (SO₂) per million parts of stack gas, on a volumetric dry basis (ppmvd), corrected to 7 percent oxygen, calculated on an hourly average. 1,000 ppmvd 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 Jet A (aka JP-8) has the highest allowable and highest potential fuel sulfur, if Jet A 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 Jet A 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:

$$\begin{aligned} \frac{2.295 \text{ lb SO}_2}{\text{MMBtu fuel heat input}} \times \frac{18,500 \text{ Btu}}{\text{lb JP} - 8} \times \frac{\text{MMBtu}}{1,000,000 \text{ Btu}} \times \frac{1 \text{ lbmol SO}_2}{64 \text{ lb SO}_2} \times \frac{1 \text{ lbmol S}}{1 \text{ lbmol SO}_2} \times \frac{32 \text{ lb S}}{1 \text{ lbmol S}} \\ = \frac{0.02 \text{ lb S}}{\text{lb JP} - 8} = 2 \text{ wt\% S in JP} - 8 \text{ fuel} \end{aligned}$$

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 Jet A could contain up to 2% by weight sulfur and still meet the 1000 ppmvd SO₂ at 7% oxygen, and because the Jet A specification is not to exceed 0.3% by weight sulfur, combustion of Jet A meeting the sulfur specification and limit established in the AOP will not exceed the 1,000 ppmvd SO₂ at 7% oxygen limit. Therefore, NASWI can show compliance with the 1,000 ppmvd SO₂ at 7% oxygen hourly average limit by burning only natural gas,

ULSD, and Jet A 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

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. Jet A is essentially No. 1 distillate fuel, and the Jet A fuel specification requires that the fuel contain no more than 0.3% by weight sulfur. NASWI has switched to ultra-low sulfur diesel (ULSD) fuel for use across the facility, and ULSD fuel contains 0.0015% by weight 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 Jet A fuel, and maintaining fuel oil supplier-provided records of fuel oil specification, including sulfur content, for all oil burned.

AOP Section 5 - Specifically Applicable Requirements

Section 5 contains tables that list applicable requirements that specifically apply to emission units. This section 5 is separated into subsections that cover the main categories of emission units: boilers and heaters, cleaning and coating operations, gasoline dispensing facilities and stationary reciprocating 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. One example of this is AOP term 5.6.1, which states that only natural gas, and not other fuels, may be burned in the IR heaters and water heaters approved under OAC 1021. NWCAA did not add monitoring to this condition because the IR heaters and water heaters are not equipped to operate on any other fuels.

Monitoring added as a gap-fill for some of the conditions in this section points back to monitoring required under Section 4 of the AOP. This was done for consistency across the facility and to reduce permit complexity.

Boilers and Heaters

Specifically applicable requirements for boilers and heater based on OACs, 40 CFR 60 Subpart Dc and 40 CFR 63 Subpart DDDDD. Some of the AOP terms for the boilers and heaters contain gap-filled language. In particular, gap-filling requires that the boilers be tested for NO_x emissions while burning both jet fuel and natural gas once every five years to demonstrate compliance with the NO_x emission limits. There are also gap-filled requirements for monitoring visible emissions at described above.

Cleaning and Coating Operations

Cleaning and coating operations are subject to Aerospace NESHAP, 40 CFR 63 Subpart GG when use subject materials. Hand-wipe cleaning requirements under Subpart GG include housekeeping and specify allowable cleaning solvents.

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". NASWI has not requested any such allowance for painting outside booths so this is

not accommodated in the AOP. The Aerospace NESHAP allows touchup painting outside of a booth under specific conditions, i.e. small painting pens, roll-on and non-refillable aerosol cans, and NASWI commonly uses these methods inside of hangars for aircraft maintenance by squadrons.

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.

There are four paint booths at NASWI that require emission controls under Aerospace NESHAP when they spray coatings that contain an inorganic HAP such as chromium. The two FRCNW Water Wash Paint Spray Booths (BTH-2547-02 & -03) control emissions using a water wash system that forces the spray booth exhaust through a water wall curtain. The FRCNW Composite Shop Booth (BTH-2818-01) uses a dry filter system for emission control. FRCNW Composite Shop Booth is typically used for painting non-structural aircraft pods made from composite materials.

Blast Booth (RBL-0995-01), Curing Oven (FRN-0995-01), and Pyrolysis Cleaning Furnace (FRN-0995-02) are listed in the AOP. All are located inside the same building at the FRCNW. These emission units were approved and constructed under OAC 755 in 2001. This original approval prohibited activities in these units that were subject to Aerospace NESHAP. In 2004, the approval order was revised to OAC 755a allowing Aerospace NESHAP regulated activities to occur in these units.

OAC 755a approved a powder coating booth (PCB-0995-01) that was installed in 2001. In 2013, this powder coating booth was removed, and a new powder coating booth (PCB-0995-02) installed in its place. The new booth (PCB-0995-02) did not receive an OAC because the booth vents indoors and is used for parts that are exempt from the Aerospace NESHAP. The requirements of OAC 755a are included in the AOP except for those related to the original powder coating booth because it no longer exists.

Gasoline Dispensing Facilities (GDF)

There are three gasoline dispensing facilities (gas stations) at NASWI. The Ault Field Naval Exchange gasoline station and the SPB Naval Exchange gasoline station are considered high volume GDF. The Ault Field Naval Exchange includes an E85 (85% ethanol, 15% gasoline) storage tank in addition to regular gasoline storage tanks.

The third facility is the Government Fleet Gasoline Station located at Ault Field. The Government Fleet Station is considered a low volume GDF with an annual gasoline throughput typically less than 20,000 gallons. 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 below the 360,000 gallon threshold, the requirements under WAC 173-491-040 do not apply directly. However, OAC 646 requires that stage I equipment be continuously maintained and operated in a vapor tight manner in accordance with WAC 173-491 and NWCAA 580. Therefore, in instances where WAC 173-491-040 is cited, OAC 646 condition 2 is also cited as the regulatory driver. 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 Reciprocating Internal Combustion Engines (RICE)

Section 5 listed all of the RICE as categorized in 40 CFR 63 Subpart ZZZZ (RICE NESHAP). There are well over 50 engines at NASWI regulated under Subpart ZZZZ. Three of these engines are used in non-emergency service. While the remaining engines are in emergency service powering emergency electrical generators. Up until 2007, new emergency engines at NASWI were approved under OACs. On November 8, 2007, the NWCAA adopted a revision to NWCAA subsection 300.4 that included a categorical exemption from NSR for diesel-fired, CI engines that are designed for emergency service. For this reason, new emergency engines installed after November 8, 2007 do not have an associated OAC listed in the AOP.

The NESHAP section of this document includes additional details on RICE under Subpart ZZZZ. For a detail list of engines at NASWI, refer to RICE tables in Section 1 of the AOP.

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 NASWI 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 emission units in Section 1 of the AOP.

TABLE 6-1 INSIGNIFICANT EMISSION UNITS AND ACTIVITIES

FACILITY ID NO.	Description	IEU Basis
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.

FACILITY ID NO.	Description	IEU Basis
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 Jet A 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 Jet A 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
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 Jet A storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks

FACILITY ID NO.	Description	IEU Basis
AST-0992-01 SPB Fuel "T" Pier Barge/Main/Pump Station 892 secondary containment	137-gallon Jet A 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 Jet A 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
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.

FACILITY ID NO.	Description	IEU Basis
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
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

FACILITY ID NO.	Description	IEU Basis
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.
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.

FACILITY ID NO.	Description	IEU Basis
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 Jet A 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 Jet A 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
AST-2911-03 Refueler shop	350-gallon Jet A 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.

FACILITY ID NO.	Description	IEU Basis
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
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

FACILITY ID NO.	Description	IEU Basis
BBL-2547-05	Glove box blasting (<0.75 tpy PM ₁₀) FRCNW Division 600	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-2547-08	Glass media blast booth (GMB02 - P/N25913 S/N Z56271), installed 2013. FRCNW Division 500	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-2547-09	Plastic media blast booth (PMB01 - P/N25913 S/N Z56272), installed 2013. FRCNW Division 500	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
BBL-0995-01	Glove box plastic media blasting booth controlled by cartridge filters. Located at powder coating facility. (<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.	Description	IEU Basis
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)
PCB-0995-02	Powder Coating Booth (GZAA 045598), Ventilates through fabric filtration and exhausts inside building, Division 900, Room 100	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.	Description	IEU Basis
CLN-2547-01	1-80 Gallon Bearing Degreasing Parts Washer (Inland Technology IT-80 S/N 241075) Solvent: MIL-PRF-680, Division 400, Room 1104	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-2547-01	1-80 Gallon Bearing Degreasing Parts Washer (Inland Technology IT-80 S/N 241413) Solvent: MIL-PRF-680, Division 400, Room 1104	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-2547-08	1-15 Gallon Turbine Bearing Hot Bath Parts Washer (S/N 11550) Oil Tank heated to 197°F, Material: 1010 Oil (SDS CXVHZ), Division 400, Room 1104	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-2547-03	1-80 Gallon Engine External Parts (clamps) Degreasing Part Washer (S/N 1011853) Solvent: MIL-PRF-680, Division 400, Main Floor	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.	Description	IEU Basis
CLN-2766-01	1-80 Gallon Engine External Parts (clamps) Degreasing Part Washer (S/N 81001280) Solvent: MIL-PRF-680, Division 400, Main Floor	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-2547-04	30 Gallon Parts Washer HYD components /Rods (S/N 33041845) Solvent: MIL-PRF-680, Division 500, Room 196	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-2547-05	80 Gallon Bearing Parts Washer (Inland Technology P/N IT-80 SN 30241412) Solvent: MIL-PRF-680, Division 500, Room 707	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-2547-09	30 Gallon Parts Washers (Gray Mill-O-ring S/N 237574-100, PN A-40455-A) Material: DARACLEAN 282, Division 500, Room 707	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.	Description	IEU Basis
CLN-2547-10	110 Gallon Aqueous Parts Washer (Better Engineering S/N 21274) Material: Daraclean 282 (Only five gallon of Daraclean is used rest is water), Division 500, Room 707	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-2547-06	35 Gallon Solvent Parts Washer (S/N SPW-0052/PN-PCS-10) Solvent: MIL-PRF-680, Division 500, Room 707	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)
DEG-2547-01	Engine/T56 Parts Washer T, 500 Gallons, Solvent: MIL-PRF-680, Division 500, Room 1013	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-2547-10	80 Gallon Parts Washer (Better Engineering S/N 13856-MODEL# F-4000-P - DOM 8/96) Material: Daraclean 282, Division 500, Room 1006	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.	Description	IEU Basis
CLN-2547-11	110 Gallon Parts Washer (Better Engineering XLG –SN 19059/MODEL # F-4000-LX-P/DOM 6/02)Material: Daraclean 282, Division 500, Room 1006	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-2547-12	80 Gallon Parts Washer (Inland Technology - MODULS S/N 29829372) Material: ISO PREP, Division 600, Room 113	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-2547-07	35 Gallon Solvent Parts Washer (S/N SPW-0053/PN-PCS-10) Solvent: MIL-PRF-680, Division 700, Room 707	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	1- 80 Gallon Bearing Degreasing Part Washer (Inland Technology IT-80, S/N 1178) Solvent: MIL-PRF-680, Division 731, Room 111	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.	Description	IEU Basis
CLN-2801-01	35 Gallon Solvent Parts Washer – (S/N SPW-0083/PN-PCS-10) Solvent: MIL-PRF-680, Division 900, Room 2801	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	30 Gallon Parts Washer- hooks, frames (Gray Mills S/N IJNR6-05) Solvent: MIL-PRF-680, Division 900, Room 114	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.

FACILITY ID NO.	Description	IEU Basis
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.
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.	Description	IEU Basis
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.
FRN-0016-02	0.90 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	Description	IEU Basis
FRN-0017-01 to-09	0.64 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0017-10 to-11	0.082 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0033-01	0.3 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0034-01	0.3 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0081-01 to -04	<1.25 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0112-01	0.3 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0130-01	0.11 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	Description	IEU Basis
FRN-0138-01	0.125 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0138-02	0.11 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0138-03	0.199 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0138-04	0.12 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0138-05	0.12 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0138-06	0.1 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-0278-02	0.2 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	Description	IEU Basis
FRN-OR12-01	0.106 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2580-01	0.08 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2733-01	0.3 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2733-02	0.5 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2734-01	0.30 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2735-01	0.04 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2737-01	0.64 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	Description	IEU Basis
FRN-2737-02	0.3 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2742-01 to-05	0.05 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2742-06 to-01	0.15 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2742-11 to-12	0.074 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2749-01	0.04 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2749-02	0.04 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2789-01	0.122 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	Description	IEU Basis
FRN-2795-01	0.3 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2813-01	0.072 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2813-02	0.072 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2813-03	0.060 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2874-01	0.4 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2874-02	0.25 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
FRN-2874-03	0.1 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	Description	IEU Basis
FRN-WHID-03	0.2 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
IRH-2544-01	1.8 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
IRH-2544-02	1.8 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
IRH-2544-03	1.8 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
IRH-2544-04	1.8 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
IRH-2737-01 to 05	1.25 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
IRH-2749-01 to 03	< 5 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	Description	IEU Basis
IRH-2681-01 to 04	1.2 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
IRH-2733-01 and 02	1.12 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
IRH-2884-01	0.075 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
IRH-2884-02	0.075 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
IRH-GRH-1 to 3	0.3 MMBtu/hour 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/hour exclusively using natural gas, butane, propane and/or LPG.
IRH-2903-01 to -03	2.6 MMBtu/hour 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/hour 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.	Description	IEU Basis
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.	Description	IEU Basis
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 Jet A 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.	Description	IEU Basis
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.	Description	IEU Basis
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 Jet A 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 Jet A 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/hour 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/hour. exclusively using natural gas, butane, propane and/or LPG.
WHT-2737-01	0.05 MMBtu/hour 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/hour. exclusively using natural gas, butane, propane and/or LPG.
WHT-2874-01	0.1 MMBtu/hour 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/hour. exclusively using natural gas, butane, propane and/or LPG.

FACILITY ID NO.	Description	IEU Basis
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.
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.

FACILITY ID NO.	Description	IEU Basis
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.
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.

FACILITY ID NO.	Description	IEU Basis
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.
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

FACILITY ID NO.	Description	IEU Basis
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/hour (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/hour 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-2641-02	Boiler: 0.63 MMBtu/hour, Ultra Low Sulfur Diesel fuel	WAC 173-401-533 (2)(g) Combustion source, of less than one million Btu/hour. if using kerosene, No. 1 or No. 2 fuel oil
BOI-0423-01	Boiler: 0.60 MMBtu/hour, Ultra Low Sulfur Diesel	WAC 173-401-533 (2)(g) Combustion source, of less than one million Btu/hour. if using kerosene, No. 1 or No. 2 fuel oil
BOI-2644-01	Boiler: 0.13 MMBtu/hour, Ultra Low Sulfur Diesel	WAC 173-401-533 (2)(g) Combustion source, of less than one million Btu/hour. if using kerosene, No. 1 or No. 2 fuel oil
BOI-0386-01	Boiler: 1.5 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-0386-02	Boiler: 1.5 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2826-01	Boiler: 0.4 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2826-02	Boiler: 1.0 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG

FACILITY ID NO.	Description	IEU Basis
BOI-2903-01	Boiler: 0.9 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2903-02	Boiler: 1.5 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2903-03	Boiler: 1.5 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2903-04	Boiler: 1.5 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2544-01	Boiler: 0.65 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2544-02	Boiler: 0.65 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2593-01 & -02	Boilers: 0.75 MMBtu/hour each, Natural gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2734-01	Boiler: 0.65 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2837-02	Boiler: 0.65 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2758-02	Boiler: 0.40 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2771-01	Boiler: 0.45 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2938-01	Boiler: 0.33 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2836-03	Boiler: 0.26 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2836-01	Boiler: 0.25 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG

FACILITY ID NO.	Description	IEU Basis
BOI-0420-01	Boiler: 0.23 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2897-01	Boiler: 0.21 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2897-02	Boiler: 0.21 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, exclusively using natural gas, butane, propane and/or LPG
BOI-2970-01	Boiler: 0.15 MMBtu/hour, Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hour, 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
BTH-0995-02	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.
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.

7. 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.

"Ecology Method 9A" means the method by which visible emissions are assessed through opacity observations as prescribed by Washington State Department of Ecology Method 9A.

"EPA Method 9" means the method by which visible emissions are assessed through opacity observations as prescribed in Method 9 of 40 CFR 60 Appendix A.

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.

“Jet A” is the common jet fuel used at the base. Jet A was previously called “JP-8”.

“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
CHP	Central Heating Plant
CEDRI	Compliance and Emissions Data Reporting Interface
dscf	dry standard cubic foot
EPA	The United States Environmental Protection Agency
FCAA	Federal Clean Air Act
FRCNW	Fleet Readiness Center Northwest
GDF	gasoline dispensing facility
Hp	horse power (brake)
HVLP	high volume, low pressure (spray guns)
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
NOCS	Notice of Compliance Status (required under NESHAP regulations)
NOx	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
ppmvd	parts per million by volume, dry basis
PSE	Puget Sound Energy

RACT	reasonably available control technology
RCW	Revised Code of Washington
SIP	State Implementation Plan
SPB	Seaplane Base
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
ULSD	Ultra-low sulfur diesel (< 15 ppm by weight sulfur)
VE	Visible emissions
WAC	Washington Administration Code
WDOE	Washington State Department of Ecology (Ecology)

8. AOP RENEWAL 3

Permit Changes in the Third AOP Renewal

The Northwest Clean Air Agency (NWCAA) received an application from NASWI for the third AOP renewal on July 31, 2017. A number of emission units have been added and removed from the facility since the last permit modification. In addition, there have been revision to a number of federal regulations that have been incorporated into the permit.

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 emission unit tables in Section 1 have been updated with additional information such as improved equipment descriptions, date of construction and applicable OACs. The RICE table has been split into the regulatory categories specified in 40 CFR 63 Subpart ZZZZ and each category sorted by engine horsepower (hp).

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 those related to greenhouse gasses. This includes adding the Clean Air Rule requiring for GHG emission mitigation under Chapter 173-442.

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 at NASWI. 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.

Section 5 is separated into four different emission unit categories: boilers and heaters, cleaning and coating operations, gasoline dispensing stations, and stationary reciprocating internal combustion engines (RICE). Federal requirements under 40 CFR 63 Subpart GG (Aerospace NESHAP), 40 CFR 63 Subpart ZZZZ (RICE NESHAP) and 40 CFR 63 Subpart DDDDD (Boiler MACT) were updated to the current version of the rules. The changes included removing startup, shutdown and malfunction plans. Section 5 modifications were made to address emission units that were added, modified, or permanently shut down since the last permitting action.

AOP Section 6 Inapplicable Requirements

A number inapplicable federal regulations were added for clarity.

Public Comment Period on Draft Permit

The NWCAA issued draft air operating permit 008R3 (AOP Renewal 3) on June 3, 2018. A 30-day public comment period on the draft permit ran for at least 30 days, ending on August 6, 2018. Notice was posted in the Whidbey Island News-Times, the Washington Department of Ecology’s Permit Register, and on the NWCAA’s website.

Copies of draft AOP renewal 3 (NASWI AOP #008R3) as well as the permit application and any technical support documents (public docket) were available online on www.nwcleanairwa.gov and at the following location during the public comment period.

Northwest Clean Air Agency
 1600 South 2nd Street
 Mount Vernon, WA 98273-5202

The only comments received on the draft permit were from NASWI. None of the comments were considered significant in nature. The following table summarizes comments received and action taken by NWCAA to address these comments.

Ref.	NASWI Comment	NWCAA Action
AOP Table 1-4-3	Add ICE-0889-02 to the table. It is actually a 415 kW emergency generator with the engine rating of 556 HP. Since the engine rating is greater than 500 HP, it should be listed in Table 1-4-3.	Change made as requested.
AOP Table 1-4-4	Add two new emergency generators: ICE-0993-03 and ICE-0993-04. They are currently stored onsite but will not be installed until next year. They are 450 kw emergency generators at Hospital. The engines are rated at 755 hp and were manufactured in January 2018 and ordered in 2017. Initial Notifications will be submitted after they are started up next year.	Changes made as requested.
AOP Table 1-4-5	Remove ICE-0889-02 from the table. ICE-0889-02 is actually a 415 kW emergency generator with the engine rating of 556 HP. Since the engine rating is greater than 500 HP, it should be listed in Table 1-4-3. The ordered year for ICE-2815-01 is 2001.	Changes made as requested.
AOP Section 4	It appears that the NWCAA image was inserted by mistake.	Removed image.
AOP Table 5-4-3	Add ICE-0889-02 to the table (see the first comment)	Change made as requested.
AOP Table 5-4-5	Remove ICE-0889-02 from the table (see the first comment)	Change made as requested.
AOP Table 5-4-5	NASWI does not have an equipment to monitor deviations of voltage or frequency > 5% below standard voltage for ICE-2873-01 (control tower). Please remove the second bullet item. There is no data logger that indicates whether the UPS and ATS were functional when the generator (ICE-2873-01) was operated for emergency service. Meaning, it is not feasible for the generator technicians to record this information in the operational log. However, we can document the run hours for emergency use and we can make the copies of the preventative maintenance and repair/service records for UPS and ATS available upon NWCAA’s request. We respectfully request that the third bulleted item be revised. Like ICE-2873-01 and ICE-0385-03, ICE-0858-02 (radar communications) and ICE-2878-01 (radar dish) are used to support the air operations. Please add ICE-0858-02 and ICE-2878-01 in the directly enforceable requirements for ICE-2873-01.	Directly enforceable text revised to accommodate.

AOP Table 5-4-6	A fire pump engine at Hangar 6 (Bldg 410) was discovered. Please add the engine to the list as ICE-0410-03. It is 218 HP engine, which was ordered in 2016 and manufactured on 5/03/16.	Fire pump engine added with specific requirements under Subpart IIII.
AOP Table 5-4-6	NASWI does not have an equipment to monitor deviations of voltage or frequency > 5% below standard voltage for ICE-0385-03 (admin). Please remove the second bulleted item. There is no data logger that indicates whether the UPS and ATS were functional when the generator (ICE-2873-01) was operated for emergency service. Meaning, it is not feasible for the generator technicians to record this information in the operational log. However, we can document the run hours for emergency use and we can make the copies of the preventative maintenance and repair/service records for UPS and ATS available upon NWCAA's request. We respectfully request that the third bulleted item be revised.	Directly enforceable text revised to accommodate.
AOP Sections 1 and 5	NASWI will operate and maintain the SPB WWTP. The plant includes one emergency generator, ICE-2615-01. Please add the generator to the AOP's Table 1-4-4 and Table 5-4-4: Location - 563 kW emergency generator - SPB WWTP ID No. - ICE-2615-01 Notes - 755 HP, manufacture 11/09, ordered 2009.	Change made as requested.
SOB Section 2	Handling and Storage of Waste – Due to the renovation project at FRCNW, the following tanks were demolished on June 19, 2018: two 2,500 gallon stripping tanks (STR-2547-01 and 02), one 1,000 gal degreasing tank (DEG-2547-01) and one 500 gallon Alodine tank.	Change made as requested.
SOB Section 2	Aircraft Engine Test Cells and Stands – please remove “(REVISED)??” in the third bulleted section.	Change made as requested.
SOB Table 2-2	Equipment Permanently Shutdown at NASWI - please add STR-2547-01, STR-2547-02, DEG-2547-01, and one 500 gallon Alodine tank (this tank was not identified in the current SOB and AOP). They were removed in 2018 and were not associated with OACs. Also, ICE-0993-02 was removed in May 2018.	Change made as requested.
SOB Section 2	Order of Approval to Construct (OAC) History – the generator was formerly identified as ICE-2614-01 but it is currently identified as ICE-2796-01.	Change made as requested.

EPA Review on Proposed permit

Following close of the public comment period, the draft permit was revised to address comments and a proposed permit and statement of basis sent to EPA Region 10 (Doug Hardesty) on October 12, 2018. Because comments were received on the draft permit, a mandatory 45-day EPA review period was provided closing on November 27, 2018.

No comments, questions, or objections were received from EPA during the 45-day review period and permit became eligible for issuance at the close of the 45-day period