

Statement of Basis for the Air Operating Permit – 008R4M1

Naval Air Station Whidbey Island

Oak Harbor, Washington

December 2, 2024



Serving Island, Skagit & Whatcom Counties

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 NAS Whidbey Island 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 NAS Whidbey Island, NAS Whidbey Island, NASWI, the base 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. Ault Field and the Seaplane Base are approximately five miles apart and are separated by the town of Oak Harbor. NAS Whidbey Island also includes an alternative landing field in the Coupeville area and a former aerial bombing training site that is part of a wetland's marsh in the Greenbank area, neither site have any operating emission units with applicable requirements, therefore they are not included in this AOP. Ault Field, Area 6, and the Seaplane Base comprise the source covered under this Air Operating Permit (AOP) and Statement of Basis.



Figure 1) NAS Whidbey Island base location on Whidbey Island

Activities at Ault Field include the maintenance and rework of military aircraft, aircraft operations training, search and rescue, other aircraft-related and squadron support activities, as well as Naval Exchange (NEX) gas station, government fleet gas station and recycling center. Air emission sources at Ault Field include paint booths and painting areas within hangars, abrasive blasting, stripping tanks, dip tanks, Central Heating Plant (CHP), other natural gas-fired boilers, hot water heaters and curing/cleaning ovens, numerous internal combustion engines (ICE), fuel storage tanks, engine test cells/stands and gasoline dispensing facilities. Composting activities occur adjacent to Ault Field, at Area 6.

The Seaplane Base is not a major source, by itself, and was not originally included as part of the Title V source but was incorporated into the AOP during the second renewal because the properties, while not contiguous, are under the same ownership and operational control. The Seaplane Base is the original base of the NAS. Personnel currently perform maintenance of government land-based vehicles, monitor Land Use Controls for groundwater remediation activities from two former fuel farms and a closed landfill under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), operate the Navy Exchange retail commissary, NEX store and gas station, receive jet fuel from barges at the wharf into a pipeline that distributes it to fuel storage tanks at Ault Field 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 facility, fuel storage tanks, several internal combustion engines, natural gas-fired heating equipment, and a vehicle paint booth.

1.1. Emissions Inventory and PTE

Regulated air pollutants as defined in Washington Administrative Code (WAC) 173-401, are emitted from NAS Whidbey Island at actual rates that are less than the Title V applicability thresholds¹, see Table 1-1 for an emission summary for calendar years 2018 – 2022.

Table 1-1: Annual Actual Emissions from NAS Whidbey Island 2018 - 2022

Pollutant	Calendar Years Emissions (tons)				
	2018	2019	2020	2021	2022
PM ₁₀	4.8	4.6	3.6	4.6	5.1
SO ₂	0.4	0.3	0.5	0.5	0.3
NO _x	12.1	14.1	10.9	11.0	12.4
VOC	38.9	31.3	25.8	30.5	26.9
CO	10.3	8.6	4.5	3.2	3.4
NH ₃	0.06	0.05	0.05	0.1	0.1
Highest Single HAP	0.84	1.22	1.11	1.31	1.5
THAP	3.3	3.7	3.1	3.6	3.9
GHG ^{b,c}	13,613	14,566	14,078	13,773	11,577

^a Highest single HAP (see Table 2-3 for which HAP was the highest emitted for that year)

^b GHG emissions from combustion unit on base, as reported in Annual WEIRS reports

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.

^c Reported as CO₂e, in units of metric tons

Table 1-2: Annual Actual Hazardous Air Pollutants from NAS Whidbey Island 2018 - 2022

Pollutant	Calendar Years Emissions (tons)				
	2018	2019	2020	2021	2022
Manganese Dioxide	0.30	0.59	1.11	1.31	1.46
Ethylene Glycol	0.84	1.22	0.14	0.77	1.06
Toluene	0.21	0.26	0.22	0.25	0.20
Methanol	0.02	0.02	0.08	0.09	0.16
MIBK	0.07	0.07	0.82	0.15	0.14
Calcium Chromate	0.03	0.04	0.08	0.11	0.13
Methylene Chloride	0.08	0.05	0.04	0.11	0.12
Xylene	0.03	0.11	0.13	0.10	0.11
Strontium Chromate	0.10	0.10	0.03	0.09	0.07
Magnesium Chromate	0.01	0.02	0.03	0.03	0.03
Ethylbenzene	0.03	0.02	0.03	0.02	0.03
Phenol	0.06	0.02	0.03	0.03	0.03
Chrome Oxide VI	0.01	0.01	0.01	0.03	0.01
Hexane	0.25	0.23	0.23	0.22	0.01
Tetrachloroethylene	0	0.05	0.08	0	0
Cyclohexane	0	0.01	0	0	0
Benzene	0.06	0.05	0.04	0.04	0.01
Formaldehyde	0.01	0.01	0.01	0.01	0.01
Naphthalene	0	0	0.01	0	0

¹ Hazardous air pollutant (HAP)

² Toxic air pollutant (TAP), per Chapter 173-460 Washington Administrative Code (WAC)

However, NAS Whidbey Island has the potential to emit (PTE) nitrogen oxides (NO_x) at rates that are greater than the Title V thresholds (PSD thresholds – 250 tpy - as well), as listed in Table 1-3. This is due primarily to the engine test cells which combust jet fuel and the larger dual-fuel boiler operated at the Central Heating Plant (CHP), none of which have any federally enforceable restrictions on the number of hours they may operate or fuels they may combust, coupled with numerous other natural gas-fired boilers and heaters, as well as diesel-fired reciprocating internal combustion engines (RICE) operated across the base. Natural gas burns clean with less carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM₁₀) or volatile organic compounds (VOC) emitted per volume of fuel consumed compared to other type of fuel such as diesel. And while there are a large number of diesel-fired emergency generators at NAS Whidbey Island that have higher potential to emit PM₁₀ and SO₂, the annual PTE for the generator engines is constrained as a practical matter due to being in dedicated emergency service.

NAS Whidbey Island also performs cleaning and coating operations, which account for the vast majority of VOC and HAP emissions. Table 1-1 lists the actual annual VOCs emitted and Table 1-2 lists the actual annual HAPs emitted for 2018 – 2022. Table 1-3 lists

estimations of individual HAP, and combined HAP PTE. While standard estimation methodologies for determining PTE from painting operations (scaling up coating/solvent usage from a 40-hour week to all 168 hours in the week, or by a factor of 4.2) do not estimate VOC, individual HAP nor combined HAP emissions exceeding Title V thresholds, NAS Whidbey Island has significant unused coating and cleaning capacity in the “40-hour week”. Hence, this standard method of estimating PTE does not provide an accurate estimate of PTE. For this reason, NWCAA considers their VOC, individual HAP and/or combined HAP PTE to be in excess of Title V thresholds for these pollutants.

As such, NAS Whidbey Island is considered a Title V applicable facility for NO_x, VOC and both single and combined HAPs due to its PTE for these pollutants.

Table 1-3: Potential to Emit, Criteria and Hazardous Air Pollutants

Pollutant	PTE (tpy)	Title V Threshold (tpy)	PTE > Title V Threshold?
PM ₁₀	10.6	100	No
SO ₂	76.3	100	No
CO	52.1	100	Yes
NO _x	253.6	100	Yes
VOC	36.9	100	Yes
HAP (individual)*	> 10	10	Yes
THAP (combined)*	> 25	25	Yes

* HAP emissions based on actual 2022 emission inventory with manganese dioxide the highest single HAP, scaled up to 8760 hours by multiplying by 4.2 (based on activities occurring for 40 hr/wk up to 168 hr/wk).

1.2. Changes Made During 4th Renewal

The Northwest Clean Air Agency (NWCAA) received the application for the fourth renewal of the AOP on November 19, 2022. The following revisions have been made to the permit during this renewal.

Changes to Section 1 of AOP

Revised AOP Section 1 to reflect the current list of emission units and regulatory applicability. Updated introductory text and table formatting.

Updated Section 1 Tables, as follows:

- Table 1-1: Updated engine test cell/stand regulatory applicability. Added Aircraft Arresting Gear System - (8) 65 hp gasoline engines, new affected sources under 40 CFR 60 Subpart JJJJ but exempt from meeting the requirements as replacement engines, and P-8 Engine Preservation using MSU 200 (non-road engine)
- Table 1-2-1: Reordered list of boilers and heaters, removed boilers identified as insignificant emission units (IEUs), removed permanently shutdown and decommissions emission units, updated regulatory applicability and added newly permitted/constructed emission units.
- Table 1-2-2: Added NWCAA Section 508 Surface Coating Operations as applicable requirements for cleaning and coating area and paint booths
- Table 1-2-3: Added NWCAA Section 580.6 Gasoline Dispensing Facilities as applicable requirements, updated Orders of Approval to Construct (OAC) listed for each gasoline dispensing facility (GDF), updated tank ID numbers, tank information and control descriptions, removed references to old approvals, tanks and vapor controls.

- Reformatted RICE Tables; added regulatory applicability; updated ICE-0384-03 and ICE-0385-03 from new, emergency ≤ 500 hp engines to new, non-emergency ≤ 500 hp; identified additional generators that are used to support critical or sensitive equipment and therefore operated during conditions that are likely to cause a power interruption, when the uninterruptable power supply (UPS) or automatic transfer service (ATS) is unavailable or considered unreliable; corrected engine ratings, manufacture dates, updated locations, removed decommissioned engines from table, and added new engines to table.

Changes to Section 2 of AOP

Revised AOP Section 2 to be consistent with current NWCAA format and content. Updated introductory text, citations and dates.

Changes to Section 3 of AOP

In Section 3, updated introductory text to be consistent with current NWCAA format and content. Updated standard terms & conditions for NSPS & NESHAP to NWCAA template language, Delegation of NSPS/NESHAP to NWCAA Letters (dates) and updated citations (dates). Moved reference to and an explanation of NWCAA's ability to enforce federal regulations to the introductory text. Updated mailing information for notifications.

40 CFR 60 NSPS

- Updated 3.1.3 Startup, Shutdown, Malfunction Record language.
- Updated 3.1.6 Performance Test language
- Updated 3.1.7 Test Method Performance Audit language

40 CFR 61 NESHAP

- Updated 3.2.8 Emission Tests language

40 CFR 63 NESHAP

- Excepted from 3.3.3. O&M for Part 63 NESHAP Sources - Subparts ZZZZ & DDDDD. These subparts address O&M/general duty to operate and maintain affected source to minimize emissions specifically, and therefore, the requirements are included either as permit conditions in Section 4 (40 CFR 63 Subpart ZZZZ) or in Section 5 (40 CFR 63 Subpart DDDDD).
- Excepted from 3.3.4. SSMP, 3.3.5. Compliance with Nonopacity Standards, and 3.3.6. Compliance with Opacity and Visible Emission Standards for Part 63 NESHAP Sources – Subpart DDDDD.
- Updated 3.3.9. Conduct of Performance Test language.
- Updated 3.3.10. updated Address for Reports, Notifications and Submittals to address submittal of information into EPA's CEDRI.
- Updated 3.3.12 Recordkeeping language and exception for Subpart DDDDD.
- Updated 3.3.13 Startup, shutdown, & Malfunction Recordkeeping & Reports to remove requirements specific to SSMPs and affirmative defense provisions; noted that requirements do not apply to Subpart DDDDD.
- Added 3.3.14 Reports specific to Subpart DDDDD.
- Removed 3.3.16 General Compliance Requirements for Subpart ZZZZ.

Changes to Section 4 of AOP

Revised AOP Section 4 to be consistent with current NWCAA format and content. Updated introductory text. Moved reference to, and an explanation of, NWCAA's ability to enforce federal regulations to the introductory text. Clarified that monitoring, recordkeeping & reporting (MR&R) requirements labeled "DIRECTLY ENFORCEABLE" are added under either NWCAA's "gap-filling" authority (WAC 173-401-615(1)(b) & (c)), or NWCAA's "sufficiency monitoring" authority (WAC 173-401-630(1)). Noted that 40 CFR 60 and 40 CFR 63 Subpart As (General Provisions), which may apply to various affected facilities/sources are listed in Section 3, though individual subparts may specify which parts of the General Provisions apply and don't apply to the affected sources. Noted that were practical, useful or to add emphasis, NWCAA has included requirements from the General Provisions (e.g., General Duty to Minimize Emissions) or may require the source to meet all of the General Provisions except for specific sections that do not apply and lists those specific sections in the permit term.

In the Generally Applicable Requirement table:

- Updated citation dates, as necessary. Included, where applicable, citations to NWCAA's "gap-filling" or "sufficiency monitoring" authority.
- Updated 4.1 MR&R list of reports.
- Further condensed paraphrased terms or MR&R language through use of abbreviations (e.g., CO or VE), acronyms and commonly recognized symbols (e.g., &) for space.
- Updated 4.12 to allow for reduced VE observation frequency at Engine Test Stands to quarterly with 6 consecutive months of no VE; reverts to monthly if VE observed, until 6 consecutive months with no VE are once again observed.
- Updated 4.21/4.22 with inclusion of NWCAA Section 520.1; updated MR&R to specify fuel sulfur content testing method for jet aviation turbine fuel, petroleum and distillate fuel oil.
- Listed requirements for tracking coating and solvent usage and storage and disposal requirements from NWCAA Section 508.4 Surface Coating Operations, as they apply to any spray coating operations performed site-wide.

Added the following terms and associated monitoring, recordkeeping & reporting (MR&R) requirements:

4.23 – RCW 70A15.5180 Fire Training Without a Permit, documentation of training activities required to perform different types of fire training activities without a fire training permit.

4.24 & 4.25 - NWCAA Section 508.4 Surface Coating Operations, tracking requirements for VOC- and HAP-containing coatings and solvents applicable to spray coating operations which may be performed site-wide and for which NAS Whidbey Island performs collectively for the entire base.

- Storage and Disposal
- Usage

4.26 & 4.27 - 40 CFR 63 Subpart ZZZZ (RICE MACT)

- Comply at All Times
- General Duty to Minimize Emissions

Changes to Section 5 of AOP

Revised AOP Section 5 to be consistent with current NWCAA format and content. Updated introductory text. Moved reference to, and an explanation of, NWCAA's ability to enforce federal regulations to the introductory text. Clarified that monitoring, recordkeeping &

reporting (MR&R) requirements labeled "DIRECTLY ENFORCEABLE" are added under either NWCAA's "gap-filling" authority (WAC 173-401-615(1)(b) & (c)), or NWCAA's "sufficiency monitoring" authority (WAC 173-401-630(1)). Noted that MR&R requirements labeled as "CAM" are part of the Compliance Assurance Plan for the specified unit as required by 40 CFR 64.6(c) and that the CAM plan submitted by the facility is included in the Statement of Basis. Noted that 40 CFR 60 Subpart A and 40 CFR 63 Subpart A (General Provisions), which may apply to various affected facilities/sources are listed in Section 3, though individual subparts may specify which parts of the General Provisions apply and don't apply to the affected sources. Noted that were practical, useful or to add emphasis, NWCAA has included requirements from the General Provisions (e.g., General Duty to Minimize Emissions) or may require the source to meet all of the General Provisions except for specific sections that do not apply and lists those specific sections in the permit term. A reminder that NWCAA Sections 365, 366, and "Guidelines for Industrial Monitoring Equipment and Data Handling" are replaced in Section 5 by NWCAA Section 367 and Appendix A, adopted July 14, 2005. The new regulations are "State Only" until incorporated into the State Implementation Plan.

In the Specifically Applicable Requirement tables:

- Updated citation dates, as necessary. Included, where applicable, citations to NWCAA's "gap-filling" or "sufficiency monitoring" authority.
- Grouped and sub-grouped similar emission units according to similar regulatory applicability/requirements within Section 5 Tables to minimize repetition of AOP terms.
- Updated Table headers to include reference to General Provision applicability and reference to Section 3 of the AOP.
- In Table 5.1 Boilers and Heaters
 - o Added 5.1.1 – General Duty to Minimize Emissions from 40 CFR 63 Subpart DDDDD (Boiler MAC).
 - o Added 5.1.2 with specific 40 CFR 63 Subpart A applicability reference with exceptions for Boiler MACT.
 - o Replaced BOI-0384-06 & -07 and associated requirements with new BOI-0384-08 & -09 and their associated requirements from 40 CFR 60 Subpart Dc, 40 CFR 63 Subpart DDDDD and OAC 1327b.
 - o Added BOI-0993-02, -03 & -04 and their associated requirements from 40 CFR 63 Subpart DDDDD and OAC 1282a.
- In Table 5.2 Cleaning and Coating Operations
 - o Updated 5.2.11 & 5.2.12 to include the coating limits in g/L, as well as lb/gal.
 - o Added requirements for NWCAA Section 508 Surface Coating Operations and where needed, gap-filled MR&R similar to existing MR&R in Aerospace NESHAP requirements or OAC MR&R.
- In Table 5.3 Gasoline Dispensing Facilities
 - o Added requirements for NWCAA Section 580.6 Gasoline Dispensing Facilities to SPB NEX ASTs and where needed, gap-filled MR&R similar to existing MR&R for WAC 173-491-040 or OAC MR&R.
 - o Replaced Ault Field NEX USTs (including removed E85 as stored fuel) and associated requirements with new ASTs (AST-2929-01, -02A&B, -03 & -04)

and their associated requirements from NWCAA Section 580.6, WAC 173-491-040(4) & (6)(e) and OAC 1372a.

- Replaced Ault Field Government Fleet facility USTs and associated requirements with new ASTs (AST-2622-01 and AST-2623-01) and their associated requirements from NWCAA 580.6 and OAC 1378a.
- Table 5.4 Stationary RICE
 - Updated regulatory applicability to include 40 CFR 60 Subpart IIII and reorganized emission unit groups.
 - Moved ICE-0384-03 and ICE-0385 from new, emergency (Table 5.4.6) to new, non-emergency (Table 5.4.2) following notice from the base that the engines had switched service.
 - Updated citations specific to engine certification by manufacturer to 40 CFR 1039.101-115.
 - Removed initial testing requirement for CO emissions for Metal Baler engine and Compost Screener engine, as both initial testing events have been performed, retained emission limit and requirement to minimize the engine's time spent at idle and engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
 - Added requirement to minimize the engine's time spent at idle and engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes to existing non-emergency compression-ignition RICE 100 to 300 hp, existing emergency compression-ignition RICE $\leq$ 500 hp, and existing emergency spark-ignition RICE $\leq$ 500 hp.
 - Added Terms that include 40 CFR 63 Subpart A applicability with specific exceptions – 5.4.2, 5.4.28, 5.4.42

Changes to Section 6 of AOP

In the Inapplicable Requirements table, removed the following sections:

- 40 CFR 60 Subpart JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion Engines as the Aircraft Arrest System engines are new affected facilities under this subpart, but are exempt from the requirements of the subpart as replacement engines until the next engine replacement. And
- 40 CFR 63 Subpart P P P P P Engine Test Cells/Stands as none of the engine test cells/stands are new or reconstructed, therefore they are all existing affected sources, but do not have to meet the requirements of the subpart.

1.3. Changes Made During Modification 1 of the 4th Renewal (Administrative Amendment)

At NASWI's, request, the responsible official was changed from Captain Eric Hank, USN, to Captain Nathan Gammache, USN. The Inspection Contact was changed from Jennifer Stewart to Allie Feidt. Permit information on page 2 of the AOP and SOB were changed to reflect issuance of this modification.

Two typographical errors were corrected:

- in the regulatory description of AOP terms 5.3.5 and 5.3.15, the table heading reading "P/V Vent Valve testing Frequency" was corrected to read "Static pressure decay test frequency" as it reads in NWCAA 580.6(F)

- in the monitoring, recordkeeping, and reporting requirements of AOP term 5.3.14, the frequency for static pressure decay test was corrected from annually to once ever three years as it reads in Condition 5 of OAC 1378a. (This change is not a relaxation of the monitoring requirement as the requirement was, and continues to be, testing every 3 years. Listing "annual" testing in the AOP was a typo.)

These changes were performed in accordance with WAC 173-401-720.

2. FACILITY DESCRIPTION

2.1. General Facility Description

The NAS Whidbey Island installation is one of the larger naval installations in the Pacific Northwest. NAS Whidbey Island supports the MH-60R Seahawk helicopter, EA-18G Growler, P-3C Orion, P-8 Poseidon, EP-3E ARIES II and C-40 Clipper aircraft for the Navy's reconnaissance and electronic attack wings. The P-3C Orion turbo-prop aircraft is currently being phased out with the new P-8 Poseidon jet engine aircraft. In all, there are approximately 18 active-duty squadrons and 2 ready reserve squadrons stationed at NAS Whidbey Island. The air station also maintains a Search and Rescue Unit, flying three 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 were installed. 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 activities occur/on-site facilities are located at the base: fire training facility, recycling and compost center, ozone depleting compound-containing

equipment, asbestos handling, explosive ordnance demolition unit, odor-producing activities and other potential nuisance emission sources.

2.2. Order of Approval to Construct History

NWCAA issues Orders of Approval to Construct (OAC) for new or modified emission units at NAS Whidbey Island. 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 federally enforceable and incorporated into the AOP as specifically applicable requirements.

Table 2-1 lists all the active Orders of Approval (OAC) and Regulatory Orders (RO) approved by NWCAA for NAS Whidbey Island, included in the AOP. Any updates to the provisions of these Orders have been incorporated into the AOP renewal, except as discussed in the individual emission unit sections. OAC numbers marked with an asterisks in Table 2-1 are applicable to the listed equipment but as they do not include any ongoing applicable requirements, are not included in Section 5 of the AOP. A more through discussion of all OACs issued at NAS Whidbey Island can be found in Section 4 of the Statement of Basis, under Emission Units, Process Descriptions and Construction History.

Table 2-1: Active OACs and ROs

Permit Issuance Date	OAC	Description	Startup Date	Super-sedes
September 13, 1984	No #*	59.65 MMBtu/hr Natural Gas/Jet Fuel Boiler, CHP		--
May 1, 1995	551	Emergency Generators, 568 hp, mfg 1993, Galley		--
March 4, 1996	528a	(2) Emergency Generators, 750 hp, mfg 8/96, Tactical Support Center – revised to reflect installation of two generators, not one	existing	528
April 11, 1996	583	Emergency Generator, 377 hp, mfg 5/96, Ault Field Water Treatment Plant		--
June 24, 1996	593	Metal Baler Engine, 152 hp, mfg 1996, Recycling Center		--
January 6, 1998	642	Emergency Generator, 600 hp, mfg 6/98, Ault Field Water Treatment Plant		--
January 30, 2004	755a	Natural Gas Powder Coating Curing Oven and Pyrolysis Cleaning Furnace, and Steel Shot Abrasive Blast Booth, FRCNW Bldg 0995 – remove restriction for Ground Support Equipment only, added Aerospace NESHAP requirements	existing	755
February 1, 2007	993	Emergency Generator, 352 hp, mfg 3/06, Tactical Support Center		--
October 16, 2008	1030	Gasoline Dispensing Facility, Stage I EVR and ASTs, SPB NEX – Stage II removal	existing	710
January 25, 2011	1081	Spray Paint Booth, SPB Transportation Bldg 0018		--

Permit Issuance Date	OAC	Description	Startup Date	Super-sedes
September 9, 2011	1100	Wood Chipper Engine, 475 hp, mfg 11/09, Compost Facility		--
August 20, 2012	1131	Composite Spray Paint Booth, FRCNW Bldg 2818		--
July 18, 2017	1282a	(1) 7 MMBtu/hr Natural Gas/ULSD LNB Boiler, (2) 3 MMBtu/hr Natural Gas-fired LNB Boilers, NHCOH – correct issue date error	existing	1282
July 12, 2022	1378a	Gasoline Dispensing Facility, Stage I EVR and ASTs with Standing Loss Control (SLC), Ault Field Gov Fleet – replace CARB EO VR-401 with CARB EO VR-402	existing	1378
September 20, 2022	1372a	Gasoline Dispensing Facility, Stage I EVR and ASTs with Standing Loss Control (SLC), Ault Field NEX – replace storage of E85 with diesel, add replacement of fuel dispensers with low-permeation hoses	existing	1372
June 7, 2023	1327b	(2) 24.49 MMBtu/hr Natural Gas-fired, Jet fuel-backup, LNB, FGR Boilers, CHP - changes to clarify testing and tune-up schedule	existing	1327a
June 7, 2023	RO51	Rescind OACs 987 and 1021	Upon issuance	--

* OAC issued as a narrative order – no ongoing, enforceable requirements contained in conditions of approval

2.3. Performance Tests

Stack tests are performed at base emissions units to determine compliance with emission limits and standards found in Orders of Approval to Construct (OAC) issued by NWCAA and as part of New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements.

Table 2-2 contains information on the tests performed from January 1, 2018 through June 30, 2023.

Table 2-2: Performance Test Summary

Compost Screening Engine (SCR-2555-01)				
Date	Pollutant	Limit	Result	Frequency
6/8/23	CO	230 ppmvd @ 15% O ₂	Pass	One Time
Metal Baler Engine (BAL-2555-01)				
Date	Pollutant	Limit	Result	Frequency
6/20/19	CO	230 ppmvd @ 15% O ₂	Pass	One Time
CHP Boiler (BOI-0384-08)				
Date	Pollutant	Limit	Result	Frequency

7/22/20	NOx	9 ppm @ 3% O ₂	Pass	Every 5 Years
	CO	50 ppm @ 3% O ₂	Pass	
CHP Boiler (BOI-0384-09)				
Date	Pollutant	Limit	Result	Frequency
7/21/20	NOx	9 ppm @ 3% O ₂	Pass	Every 5 Years
	CO	50 ppm @ 3% O ₂	Pass	

2.4. Enforcement History

NAS Whidbey Island is required to notify NWCAA when excess emissions are released to the atmosphere and when the facility deviates from AOP monitoring, recordkeeping and reporting requirements. Agency staff also conduct 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 is taken, 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 Enforcement and Compliance History Online (ECHO) database until the enforcement action is fully resolved.

A brief summary of the only Notice of Violation (NOV) issued to NAS Whidbey Island by NWCAA from calendar year 2018 through calendar year 2022 is presented in Table 2-3. The violation listed in the table has been resolved through corrective action taken by the source.

TABLE 2-3: NOTICE OF VIOLATIONS ISSUED TO NAS WHIDBEY ISLAND

Case No	Violation Date(s)	Issue Date	Description
NOV Corrective Action Order 4478	5/20/20 & 5/26/21	6/16/21	Boiler BOI-0384-08 emissions exceeded NOx emission limits due to the same or similar root cause: a loose FGR actuator linkage. No penalty assessment if corrective action taken: Boiler was shutdown, repaired & retested 5/28/21. PM procedures were updated to ensure handheld combustion analyzers were used throughout the year to ensure good combustion performance & issues are addressed as they are found. Resolved 9/3/21.

2.5. Periodic Reports

NAS Whidbey Island has periodic reporting requirements contained in various orders and regulations. Reported elements provide a valuable tool indicating the base's compliance status with regard to an applicable emission limit or operational limit. In addition to these periodic reports the base has specific action-based notifications and on-site recordkeeping requirements. Note that, similar to all recordkeeping, the data supporting the reported information must be maintained for at least five years from its date of generation.

NAS Whidbey Island 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 NAS Whidbey Island responsible official that include statements regarding the truth and accuracy of the information in each report.

Title V Reports: All required monitoring reports must be certified by a responsible official of the truth, accuracy, and completeness of the reports. Where an applicable requirement requires reporting more frequently than once every six months, the responsible official's certification need only to be submitted in the Title V semiannual report that specifically identifies all documents subject to the certification. The base is required to submit an annual Title V compliance certification that lists each term of the permit, the compliance status, whether the compliance was continuous or intermittent, and the methods used for determining the compliance status.

NESHAP Reports: The base is required to submit semiannual reports under 40 CFR 63 Subparts GG Aerospace Manufacturing and Rework and Subpart ZZZZ Reciprocating Internal Combustion Engines. Subpart GG semiannual reports identify compliance status with applicable standards for cleaning operations; primer, topcoat and specialty coating application operations; and repainting operations. Semiannual reports required under Subpart ZZZZ identify compliance status with respect to applicable emission limitations and operating limitations and whether any malfunctions occurred.

NAS Whidbey Island is also required to submit once every five years a compliance report under 40 CFR 63 Subpart DDDDD Boilers and Heaters that identifies the date of the most recent tune-up and burner inspection for each applicable unit.

Generally, reports are due 30 days after the close of the period that the reports cover. Also, the reporting periods are on a calendar basis: monthly reports cover a calendar month, quarterly reports cover a calendar quarter, six-month reports cover January through June and July through December, and annual reports cover a calendar year.

2.6. Insignificant Emission Units (IEUs)

The base has emission units and activities determined to be insignificant under WAC 173-401-530, -532, and -533. In general, they are considered insignificant because they have low emission rates or generate only fugitive emissions. The Generally Applicable Requirements in Section 4 of the air operating permit apply to these units, although the testing, monitoring, recordkeeping, and reporting requirements do not apply. As specified in WAC 173-401-530(2)(a), no emission unit or activity subject to a federally enforceable requirement, other than generally applicable requirements of the state implementation plan, may qualify as insignificant. The insignificant emission units and activities located at NAS Whidbey Island are listed in Section 7 of this SofB.

3. REGULATORY APPLICABILITY

3.1. 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 24.49 MMBtu/hour Heating Plant boilers at NAS Whidbey Island (BOI-0384-08 and -09) are subject to 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial Commercial Institutional Steam Generating Units and numerous diesel engines at NAS Whidbey Island 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 these 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 24.49 MMBtu/hour boilers (BOI-0384-08 and -09) 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 fuel. 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 for 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), horsepower rating and whether or not the engine is a fire pump engine. 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 NAS Whidbey Island cannot meet non-emergency standards, so the Subpart IIII requirement to have a run time meter is not in the AOP. Subpart IIII does not have any recordkeeping of run time hours for emergency engines in non-emergency service. Therefore, directly enforceable requirements to keep records of the number of hours each emergency engine operates in emergency and non-emergency service has been added to emergency engine AOP monitoring, record keeping, and reporting (MR&R) terms under NWCAA's gap-filling authority, to monitor compliance with the limit on the number of hours each engine can be operated in non-emergency service each calendar year. The other provisions of Subpart IIII including fuel quality, emission standards, and duty to comply are listed in the AOP.

NAS Whidbey Island operates a number of new CI engines that are directly subject to 40 CFR 60 Subpart IIII, due to construction date (date equipment was ordered). In addition, several categories of CI engines subject to 40 CFR 63 Subpart ZZZZ meet the requirements of Subpart ZZZZ by meeting the requirements in 40 CFR 60 Subpart IIII. A more detailed discussion of the overlap between NSPS and NESHAP can be found in Section 4, under Reciprocating Internal Combustion Engines.

40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

The provisions of Subpart JJJJ of 40 CFR 60 are applicable to manufacturers and operators of stationary spark ignition (SI) 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), horsepower rating and whether or not the engine is a fire pump engine.

There are ten SI RICE at NAS Whidbey Island:

ICE-0087-01 is a natural gas-fired, emergency RICE used at the Elmer Site/Saratoga Heights Base Housing Water Tower at the Seaplane Base, ordered in 2001 with an engine manufacturing date of March 21, 2001 and ICE-2629-01 is a natural gas-fired, emergency RICE used at Simard Hall at Ault Field, ordered 1999 with an engine manufacturing date of December 15, 1999; both these engines' construction date (date engine was ordered) pre-date NSPS JJJJ applicability.

The remaining eight, 4-stroke, gasoline-powered SI engines (65 hp each) are used to rewind the tape onto the drum following use of the Aircraft Arresting Gear Systems deployed for rapid deceleration of aircraft undergoing brake failures, blown tires, steering problems, a disabled pilot, or other emergency situations. These four systems (2 engines required per system) were installed in the 1960s: engines are replaced routinely ~ every 10 - 15 years; the last replacement was in 2010, making each engine a new affected facility under 40 CFR 60 Subpart JJJJ. However, these engines are labeled as "replacement engines", which are currently exempt from meeting the requirements in NSPS Subpart JJJJ, as allowed under §60.4230(e) and as described in §1068.240.

Note, the current version of NSPS Subpart JJJJ does not reflect the version in effect at the time the engines were last replaced (2010). Specifically, EPA added language to Subpart JJJJ that became effective March 10, 2014, restricting the application of the exemption to equipment that was 40 years old or less at the time it was originally installed. As this 40-year limitation was not included in the exemption at the time the engines were last replaced, the exemption for the currently installed "replacement engines" stands.

At the next engine replacement, the exemption will no longer apply, resulting in the engines becoming subject to the full emission standards for new, non-emergency, SI engines required by 40 CFR 60 Subpart JJJJ.

3.2. 40 CFR 61 - National Emission Standards for Hazardous Air Pollutants (NESHAP)

NAS Whidbey Island 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 NAS Whidbey Island. 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 NAS Whidbey Island 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.

3.3. 40 CFR 63 - National Emission Standards for Hazardous Air Pollutants (NESHAP)

NAS Whidbey Island 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 at NAS Whidbey Island 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, natural gas, diesel and jet fuel-fired boilers and heaters subject to 40 CFR 63 Subpart DDDDD – Boilers and Heaters and emergency, non-emergency and fire pump engines subject to 40 CFR 63 Subpart ZZZZ – Reciprocating Internal Combustion Engines. NESHAP Subpart A requirements are listed in Section 3 of the AOP as generally applicable to affected sources. Where specific NESHAPs identify significant sections of Subpart A that do not apply to the affected source(s), a permit term has been added to emphasize the distinction (e.g., Boiler MACT).

40 CFR 63 Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities

NAS Whidbey Island has the potential to emit greater than 10 tons per year of a single Hazardous Air Pollutants (HAPs) and 25 tons per year of combined HAPs, operates equipment and performs activities triggering applicability of 40 CFR 63 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, NAS Whidbey Island 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.

This regulation is discussed in more detail in Section 3. Equipment and operations that are potentially regulated by Subpart GG are presented below.

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)² 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. These engines are the emitting portion of a generator set used to provide electrical power.

Most of the engines at NAS Whidbey Island are diesel-fired, compression-ignition (CI) engines with the exception of:

- two spark-ignition (SI) engines fired on natural gas, and
- eight SI engines fired on gasoline.

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 ≤ 250 hp located at a major source of HAP

A category for new, non-emergency, SI engines has not been included in the AOP for the eight 65 hp gasoline powered SI engines used in the Aircraft Arresting Gear Systems. This is because, as new 4-stroke, rich burn, gasoline stationary SI RICE at a major source of HAP < 500 hp, the engines meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart JJJJ for spark ignition engines, in accordance with §63.6590(c)(4). However, these engines are labeled as "replacement engines", which are currently exempt from meeting the requirements of NSPS Subpart JJJJ, as allowed under §60.4230(e) and as

² 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.

described in §1068.240. At the next replacement of the engines, the replacement exemption will no longer apply and this category will be added, and these engines and applicable requirements will be listed.

Under Subpart ZZZZ 63.6625(d) and (f), new or reconstructed 4-stroke, lean burn emergency engines with a site rating of 250 hp or greater (NAS Whidbey Island has none) and existing emergency engines with a site rating of 500 hp or less at a major source of HAPs are required to have non-resettable run time meters installed. Subpart ZZZZ 63.6640(f) allows emergency engines at a major source of HAPs to operate for up to 100 hours in a calendar year for maintenance checks or readiness testing. 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)(3).

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 unless the engine used for emergency service does not meet the standards for engines in non-emergency service. Since there is no indication that the emergency engines at NAS Whidbey Island cannot meet non-emergency standards, the Subpart ZZZZ requirement to keep run time records is not incorporated directly as an applicable requirement into the AOP. However, this is an important parameter that NWCAA uses in its compliance assessments. Therefore, records of the number of hours each engine operates in emergency and non-emergency service has been added to AOP monitoring, record keeping, and reporting (MR&R) terms as directly enforceable requirements, under NWCAA's gap-filling authority, to monitor compliance with the limit on the number of hours each engine can be operated in non-emergency service each calendar year.

There are ten emergency and two non-emergency, diesel-fired engines at NAS Whidbey Island that support either sensitive equipment that are not supported by any uninterruptable power supply or critical equipment related to aircraft flight operations (e.g., control tower, radars). Loss of electrical power to sensitive or 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 NAS Whidbey Island's critical infrastructure is interrupted for a brief moment, a comprehensive critical systems restart is required which takes in excess of 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 NAS Whidbey Island significantly increase risk of damaging sensitive equipment, can violate flight safety requirements, and increases the potential for injury to personnel and residents at NAS Whidbey Island 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 NAS Whidbey Island can impede the primary missions of these agencies by breaking their connection to air surveillance systems at NAS Whidbey Island and other remote stations, which they require to protect national interests and manage civil air traffic in a 50-nautical-mile radius around NAS Whidbey Island.

The twelve diesel engines that support sensitive and critical equipment related to aircraft flight operations are listed in Section 1 of the AOP with the following notation.

“This generator supports sensitive equipment which is not supported by any uninterruptable power supply (UPS) or critical equipment and is operated during conditions that are likely to cause a power interruption (e.g. inclement weather), or 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 during 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, NAS Whidbey Island has experienced a series of power interruptions and/or outages under inclement weather events.

The twelve diesel generators that support sensitive or 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 the ten emergency 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 against the 50 hours of the 100-hour limit in non-emergency situations. No hour limits are required for engines in non-emergency service.

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

Requirements for fuel, emission and operating limits (where applicable), maintenance, record keeping and reporting have been included 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 NAS Whidbey Island 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 NAS Whidbey Island 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 NAS Whidbey Island utilizes an ISO 50001 compatible energy improvement program in lieu of a one-time energy assessment for their boilers. Notice that NAS Whidbey Island complied in this manner was received by NWCAA by email on October 13, 2015. The notice was due on January, 31, 2016.

40 CFR 63 Subpart IIII – Surface Coating of Automobiles and Light-Duty Trucks

NAS Whidbey Island does not surface coat new automobiles or light-duty trucks, they only perform collision and corrosion repair on used vehicles.

40 CFR 63 Subparts MMMM – Surface Coating of Miscellaneous Metal Parts and Products/ PPPP – Surface Coating of Plastic Parts and Products

NAS Whidbey Island paints waste collection dumpsters at the Seaplane Base in paint booth BTH-0018-01. As a major source of HAP emissions, these requirements *could* apply to this operation. However, 63.3881(c)(4) makes the requirements of this subpart inapplicable to the surface coating of metal parts or products performed on-site at installations owned or operated by the Armed Forces of the United State, therefore NAS Whidbey Island is not subject to these requirements.

40 CFR 63 Subpart PPPPP – National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Stand

40 CFR 63 Subpart PPPPP applies to the emissions of hazardous air pollutants (HAPs) at engine test cells/stands located at major sources of HAP emissions. Affected sources are any engine test cell/stand used for testing uninstalled stationary or uninstalled mobile (motive) engines at major sources of HAPs. Affected sources are existing sources if construction of the source was commenced on or before May 14, 2002. According to 639290(b), existing affected sources do not have to meet the requirements of 40 CFR 63 Subpart PPPPP or 40 CFR 63 Subpart A.

The (3) engine test cells/stands at NAS Whidbey Island were installed, as follows:

- ETC-2765-01 (1990's)
- ETC-2525-02 (~1995)
- ETC-2525-03 (~1995)

Based on installation dates, all of the affected sources at NAS Whidbey Island are existing affected sources under Subpart PPPPP, however, there are no applicable requirements to incorporate into the AOP.

40 CFR 63 Subpart CCCCC Gasoline Dispensing Facilities

This is an area source standard and NAS Whidbey Island is a major source of HAPs, therefore these standards do not apply.

40 CFR 63 Subpart HHHHHH – Paint stripping and Miscellaneous Surface Coating Operations

This is an area source standard and NAS Whidbey Island is a major source of HAPs, therefore these standards do not apply.

40 CFR 63 Subpart Y – Marine Tank Vessel Loading Operations

40 CFR 63 Subpart Y applies to marine tank vessel loading operations that are major sources of HAP. NAS Whidbey Island operates a marine tank vessel unloading operation at the Seaplane base, and therefore is not subject to the requirements of 40 CFR 63 Subpart Y.

3.4. 40 CFR 64 - Compliance Assurance Monitoring (CAM)

40 CFR Part 64 Compliance Assurance Monitoring (CAM) is intended to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act for large emission units that rely on pollution control device equipment to achieve compliance. The CAM rule (40 CFR Part 64) requires owners and operators to conduct monitoring to determine that control measures, once installed or otherwise employed, are properly operated and maintained so that they continue to achieve a level of control that complies with applicable requirements.

The CAM approach establishes monitoring for the purpose of:

- Documenting continued operation of the control measures within ranges of specified indicators of performance that are designed to provide a reasonable assurance of compliance with applicable requirements,
- Indicating any excursions from the performance indicator ranges, and
- Responding to the data so that the cause or causes of the excursions are corrected.

The first step in the CAM process is to determine the applicability of CAM to each pollutant-specific emission unit (PSEU). The determination is made on a pollutant-by-pollutant basis for each emission unit. To be subject to CAM, the PSEU must be:

1. Located at a major source required to obtain a Part 70 permit,
2. Subject to an emission limit or standard for the applicable pollutant,
3. Use a control device to achieve compliance,
4. Have potential pre-control emissions of the applicable pollutant that are at least 100% of major source threshold, and
5. Not otherwise exempt

NAS Whidbey Island is a major source required to obtain a Part 70 permit, so all emission units at the base are potentially subject to CAM. Table 3-1 provides a summary of the CAM applicability determination for the PSEUs on site. The table identifies the PSEU, pollutant(s), whether there is a control device, other than inherent process equipment provided for safety or material recovery, or passive methods that prevent pollutants from forming (e.g., low NO_x burners, lids or seals, etc), that destroy or remove pollutants prior to discharge to the atmosphere to achieve compliance, and the basis for the non-applicability determination. A determination of non-applicability at a unit otherwise exempt due to being subject to a standard under 40 CFR Part 60 (NSPS) or 40 CFR Part 63 (MACT), is based on the date the final rule is promulgated instead of the proposal date, as all of the

federal standards applicable at NAS Whidbey Island that were proposed before November 15, 1990 were also finalized before November 15, 1990.

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

Table 3-1: CAM Applicability Determination

Pollutant Specific Emission Units (PSEUs)	Pollutant - Control Device	Reason(s) for Non-Applicability
Aircraft Engine Test Cells	PM ₁₀ & VE - Uncontrolled	No control device
Boilers: Dual-fuel Boilers - BOI-0384-04, BOI-0384-08 & -09 CHP, & BOI-0993-02 NHCOH; NG Boilers: BOI-0993-03 & -04	NO _x - Uncontrolled or LNB, with or without FGR	Otherwise exempt, units subject to 40 CFR 63 Subpart DDDDDD (effective 3/21/11)
	CO - Uncontrolled	
	PM ₁₀ & VE - Uncontrolled	No control devices for CO, PM, VE
Paint Booths - Composite Shop Paint Booth (BTH-2818-01) & FRCNW (BTH-2547-02 & -03)	PM ₁₀ & VE - Spray Booth Filtration (dry media or water curtain)	Uncontrolled PTE from Composite Shop PB ¹ < 100 tpy Otherwise exempt, PBs subject to AEROSPACE NESHAP, effective 9/1/95
	VOC/HAP - Uncontrolled	Otherwise exempt, subject to AEROSPACE NESHAP, effective 9/1/95
Composting Facility	VOC - biofilter	No emission limit
Gasoline Dispensing Facilities (Ault Field NEX, Government Fleet & SPB NEX)	VOC/HAP - Stage I EVR & @ both Ault Field Sites AST SLC	No emission limit
Reciprocating Internal Combustion Engines (note: many RICE are subject to 40 CFR 63 Subpart ZZZZ, effective 6/15/04 and/or 40 CFR 60 Subpart IIII 7/11/06 and are therefore otherwise exempt from CAM)	NO _x - Uncontrolled	No emission limit No control device
	CO - Uncontrolled	No control device
	SO ₂ - Uncontrolled	No control device
	VOC/HAP - Uncontrolled	No control device
	PM ₁₀ & VE - Uncontrolled	No control device
Steel-shot Abrasive Blast Booth (RBL-0995-01)	PM ₁₀ & VE - Fabric Filter Dust Collector	Uncontrolled PTE ² < 100 tpy
Paint Booth - Transportation Maintenance (BTH-0018-01)	PM ₁₀ & VE - Spray Booth Dry Filtration	Uncontrolled PTE ³ < 100 tpy
	VOC/HAP - Uncontrolled	No emission limit No control device

Table Notes:

¹ 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%.

² 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 media³. 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.

³ Spray booth has an uncontrolled PTE of 0.05 tpy PM₁₀ based on scaling up PTE calculations in the NSR review worksheet by 4.2 and removing the reduction for hvlp technology.

Note that in this CAM applicability analysis, pre-controlled emissions are not calculated (because CAM doesn't apply by definition) when:

- a control device is not used to achieve compliance,
- there are no emission limits or standards that apply, or
- the PSEU is otherwise exempt.

A PSEU is otherwise exempt when subject to:

- Post-11/15/90 proposed NSPS or NESHAP, as those standards were designed with monitoring that provides a reasonable assurance of compliance
- Stratospheric ozone protection requirements
- Acid rain program requirements
- Emission limitations, standards, or other requirements that apply solely under an approved emission trading program
- Emissions cap that meets the requirements of §70.4(b)(12)
- Emission limitations or standards for which a Part 70 permit specifies a continuous compliance determination method that does not use an assumed control factor, such as a CEMS used to determine compliance with an emission limitation or standard on a continuous basis, consistent with the averaging period established for the emission limitation or standard and provides data in units of the standard.

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

3.5. 40 CFR 68 - Risk Management Plan 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.

NAS Whidbey Island 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.

3.6. NWCAA Section 508 - Surface Coating Operations

NWCAA Section 508 applies to spray coating operations at sources within NWCAA's jurisdiction. It establishes a program of work practice standards and controls for spray coating operations to reduce particulate matter emissions from coating overspray, lessen

public exposure to toxic air pollutants, decrease emissions of precursors to the formation of tropospheric ozone and encourage pollution prevention. NWCAA's spray coating regulation does not apply to spray application of architectural or maintenance coatings on stationary structures.

NAS Whidbey Island has (8) paint booths, as follows:

- (2) waterwash paint booths, FRCNW in 51B at Ault Field (BTH-2547-02 & BTH-2547-03)
- (1) 3-stage dry filtration spray booth, FRCNW 51F at Ault Field (BTH-2818-01)
- (1) powder coating paint booth for painting ground support equipment; this booth is not subject to NWCAA 508 as powder coating is not a spray coating operation, by definition. This unit qualifies as an insignificant emission unit (PDC-2801-01)
- (1) dry filter paint booth, FRCNW for painting ejection seats. FRCNW no longer has their work center so they no longer conduct any painting (BTH-0985-01)
- (1) powder coating paint booth w/ dry filtration vented inside building, FRCNW Bldg 995 at Ault Field; this booth is not subject to NWCAA 508 as powder coating is not a spray coating operation, by definition. This unit qualifies as an insignificant emission unit (BTH-0995-02)
- (1) carbon box mat paint booth for aerosol can application of less than 2 gallons per year at BOSC Shop; this booth is not subject to NWCAA 508 as aerosol can application is not a spray coating operation, by definition. This unit qualifies as an insignificant emission unit (BTH-0371-01)
- (1) dry filter paint booth, Transportation Bldg 18 at SPB (BTH-0018-01)

Requirements in NWCAA Section 508 apply to painting performed in the booths except the (2) powder coating booths, the carbon box mat booth and the FRCNW work center booth in which painting has been discontinued.

NAS Whidbey Island also performs spot-painting on aircraft within numerous hangars. NWCAA Section 508 applies to hangar painting, as follows:

- Spray coating operations (use of HVLP application method) are excepted from the enclosure requirements in NWCAA 508.4(A)(1)(a) per NWCAA 508.4(A)(1)(f) Inside Exhaust, but must meet other applicable requirements (application methods, equipment cleanup, disposal)
- Application of coatings using aerosol cans, brushes, marking pens/semipens, roll-on, and popcans is not included in the definition of "spray coating operation" and therefore is not required to be performed within an enclosure and is not subject to requirements in NWCAA 508.

Spray coating operations of large objects that occur outside an enclosed spray area are allowed when it is impractical to totally enclose the large object, provided reasonable precautions are taken to enclose the object and avoid creating a nuisance, per NWCAA 508.4(A)(1)(d). NASWI infrequently performs spray application of anticorrosion coating to aircraft that are parked near the saltwater. NAS Whidbey Island must track any instance in which spray coating operations occur outside an enclosed booth.

3.7. NWCAA Section 580.6 - Gasoline Dispensing Facilities

Vapor control requirements in NWCAA Section 580.6(b) apply to all gasoline dispensing facilities with an annual 12-consecutive month throughput equal to or greater than 120,000 gallons. NAS Whidbey Island's Government Fleet facility does not have annual throughput equal to or greater than 120,000 gallons.

However, in order to be exempt from the rest of NWCAA Section 580.6, the Government Fleet facility tanks must have:

- a capacity less than 2,000 gallons if installed before January 1, 1990;
- offset fill lines installed before January 1, 1990; or
- a capacity less than 264 gallons.

NAS Whidbey Island's Government Fleet facility has two aboveground gasoline storage tank with a capacity greater than 2,000 gallons and is therefore subject to NWCAA 580.6, along with both NEX facilities operated at Ault Field and Seaplane Base.

3.8. 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 attainment⁴ 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.

NAS Whidbey Island 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 NAS Whidbey Island 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.

3.9. 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. NAS Whidbey Island reports GHG emissions to NWCAA and Ecology as part of the required annual emissions inventory.

3.10. 40 CFR 98 - Federal Mandatory GHG Inventory Regulation

This regulation does not apply to NAS Whidbey Island at the time of this permit renewal because GHG emissions from stationary sources at NAS Whidbey Island do not exceed the

⁴ 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)).

25,000 metric ton CO₂ equivalents⁵ (CO₂e). If at some point GHG emissions from stationary sources at the NAS Whidbey Island facility do exceed 25,000 metric tons CO₂e, then NAS Whidbey Island will become subject to this rule. This regulation is implemented in its entirety by the EPA. If NAS Whidbey Island 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.

3.11. Chapter 173-441 WAC - Reporting of Emissions of GHG

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. NAS Whidbey Island is an affected source under this rule. The rule is similar to the existing Federal Mandatory Greenhouse Gas Emission Inventory Regulation (40 CFR 98). NAS Whidbey Island reports GHG emissions to Ecology according to the provisions of this rule.

3.12. Chapter 173-442 - Clean Air Rule (CAR) - REPEALED

The Clean Air Rule was repealed on August 18, 2023. The rule required GHG reductions for certain facilities. Since WAC 173-442 has been repealed, it is not included in the NAS Whidbey Island AOP.

4. EUS, CONSTRUCTION HISTORY, & REGULATORY DISCUSSION

4.1. Boilers

Boilers located throughout the base supply steam and hot water for indoor space heating. Table 4-1 lists all boilers at NAS Whidbey Island with specifically applicable requirements, along with the information necessary to determine applicability of the Boiler MACT (40 CFR 63 Subpart DDDDD). No boilers that qualify as an insignificant emissions unit (IEU) are included in Table 4-1. All boilers that are considered IEUs are listed in Section 7. A boiler qualifies as an IEU if it is not subject to the Boiler MACT and has no other specifically applicable requirements from an OAC issued by NWCAA. Construction history and permitting discussions for all boilers that have received OAC approvals follow the Table. An explanation for any OAC conditions not included in the AOP is provided.

⁵ 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.

Table 4-1 Boilers

Unit ID	Location	MMBtu /hr	Fuel	Install Year	MACT New/ Exist.	Steam or Hot Water?	Boiler MACT Applies? ¹
Ault Field							
BOI-0384-04	Central Heating Plant	59.65	Natural Gas/Jet Backup	1987/ 1988	Existing	Steam	Yes
BOI-0384-08	Central Heating Plant	24.49	Natural Gas/Jet Backup	2020	New	Steam	Yes
BOI-0384-09	Central Heating Plant	24.49	Natural Gas/Jet Backup	2020	New	Steam	Yes
BOI-0993-02	Naval Health Center Oak Harbor	7.05	Natural Gas/ ULSD Backup	2017	New	Hot Water	Yes
BOI-0993-03	Naval Health Center Oak Harbor	3.0	Natural Gas	2017	New	Hot Water	Yes
BOI-0993-04	Naval Health Center Oak Harbor	3.0	Natural Gas	2017	New	Hot Water	Yes
BOI-2549-01	Auto Hobby	2.25	Propane	1996	Existing	Hot Water	Yes
BOI-2973-01	P-8 Trainer Facility	2.00	Natural Gas	2015	New	Hot Water	Yes
Seaplane Base (SPB)							
BOI-0022-01	Warehouse	2.20	Natural Gas	1990	Existing	Steam	Yes
BOI-0013-01	Thrift shop	1.60	Natural Gas	1978	Existing	Steam	Yes
BOI-0017-01	Naval Exchange	1.01	Natural Gas	1998	Existing	Steam	Yes
BOI-0012-01	Admin (Former PBY Museum - B2629)	0.94	Natural Gas	1978	Existing	Steam	Yes
¹ MACT exemption basis - Hot water boiler rated less than 1.6 MMBTU/hour;							

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 therefore 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. This boiler is an affected source under 40 CFR 63 Subpart DDDDD but pre-dates the applicability for 40 CFR 60 Subpart Dc.

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 unit being decommissioned in February 2017.

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 was rated at 54.8 MMBtu/hour natural gas heat input and 53.5 MMBtu/hour jet fuel heat input. Jet fuel was used as backup fuel in the boilers so the permit listed the boilers heat input capacity as 54.8 MMBtu/hour. The OAC limited Jet fuel sulfur content to 0.3% by weight and the volume of liquid backup fuel that could be burned on a rolling 12-month basis. The OAC limited nitrogen oxide emissions according to fuel type and visible emissions to 5% opacity except as allowed for grate cleaning. The boilers were subject to 40 CFR 60 Subpart Dc and 40 CFR 63 Subpart DDDDD. OAC 594 was removed from the AOP during the 2023 renewal following the boilers being decommissioned and removed from service in 2019, when boilers BOI-0384-08 and -09 were constructed (approved in OAC 1327b).

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). NAS Whidbey Island 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 was 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 limited opacity to 5% or less and required that only natural gas fuel be used in the infrared heaters. With the issuance of RO 51 on June 7, 2023, this OAC was rescinded by NWCAA and the 2023 AOP renewal no longer includes OAC 987 nor lists the emission units in the permit; they are now included in the list of insignificant emission unit (IEU) in Section 7 of this Statement of Basis.

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. NAS Whidbey Island 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 limited visible emissions to no more than 5% opacity and only allowed natural gas fuel to be used in the combustion units. NAS Whidbey Island was also required to maintain a list of the serial numbers of the equipment covered by OAC 1021; this facilitated the identification of the originally installed equipment. With the issuance of RO 51 on June 7, 2023, this OAC was rescinded by the NWCAA and the 2023 AOP renewal no

longer includes OAC 1021 nor lists the emission units in the permit; they are now included in the list of insignificant emission unit (IEU) in Section 7 of this Statement of Basis.

OAC 1282a (7/18/17) – 7 MMBtu/hour Boiler (BOI-0993-02), (2) 3 MMBtu/hour Boilers (BOI-0993-03 and 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 Naval Health Clinic. The boilers are fired on natural gas, with the option of combusting ULSD as backup fuel in the largest boiler, BOI-0993-02. Boiler MACT requires that a tune-up be completed on the Naval Health Clinic boilers every five years following startup. The agency received an initial Boiler MACT NOCS report for the three Naval Health Clinic boilers on April 19, 2018 via CEDRI. The three Naval Health Clinic boilers approved under OAC 1282a replaced a single 8.4 MMBtu/hour boiler (BOI-0993-01) approved on under OAC 243 in 1988 that was decommissioned and removed from the Naval Health Clinic on February 13, 2017.

One-time only/already satisfied OAC conditions not included in AOP: Condition 4 – NWCAA received startup notice for BOI-0993-03 and -04 on September 7, 2017 and for BOI-0993-02 on April 20, 2018.

OAC 1327b (6/7/23) – (2) 24.49 MMBtu/hr Boilers (BOI-0384-08 and BOI-0384-09). The OAC was issued July 24, 2019 for two, 600 horsepower (HP), natural gas-fired, Cleaver-Brook model CBLE boilers at the Central Heating Plant (CHP). Each boiler is equipped with low NOx burners, an economizer, flue gas recirculation and oxygen trim. The boilers have the ability to combust oil as a backup fuel. The two new boilers replaced two existing, larger boilers (BOI-0384-06 and BOI-0384-07) approved under OAC 594 that were decommissioned in 2019. OAC 1327 establishes NOx (9 ppm @ 3% O₂ natural gas; 70 ppm @ 3% O₂ distillate) and CO (50 ppm @ 3% O₂ natural gas and distillate) emission standards for each fuel combusted, visual emission limitations (0% opacity), distillate sulfur content (0.3% by wt) limits, distillate combustion operating limits (48 hr/yr, each boiler) and periodic (annual and five-year) testing requirements. OAC 1327a was issued December 18, 2019, approving jet fuel (distillate oil similar to kerosene) as backup fuel instead of USLD. OAC 1327b was issued June 7, 2023 to update boiler identification names/numbers and clarify and rephrase the natural gas-firing testing schedule, allowing for 4th calendar quarter testing when normal boiler load is higher.

RO 51 (6/7/23) - Regulatory Order issued June 7, 2023 rescinding OACs 987 and 1021. NWCAA issued OACs 987 and 1021 for installation of multiple small (1.5 MMBtu/hr or less) natural gas-fired hot water boilers, heaters and infrared radiant (IR) heaters, as noted below. Today, NWCAA's New Source Review thresholds no longer trigger review of emission units in these size categories/for these emission thresholds, therefore, at NAS Whidbey Island's request, NWCAA rescinded OACs 987 and 1021 for the following locations/equipment:

Hangar 5 - Bldg 386: BOI-0386-01 through -02; IRH-0386-01 through -08; WHT-0386-01 through -04 [*note - WHT-0386-02 removed from service/not replaced]; and WHT-0386-05 through -07) approved in OAC 1021 issued February 25, 2008.

Hangar 6 - Bldg 410: IRH-0410-01 through -16 approved in OAC 987 issued January 5, 2007.

Hangar 8 - Bldg 2642: IRH-2642-01 through -16 approved in OAC 987 issued January 5, 2007.

Hangar 10 - Bldg 2699: IRH-2699-01 and IRH-2699-02 approved in OAC 987 issued January 5, 2007.

As there are no ongoing requirements in RO 51, it is not included in the AOP.

4.2. Cleaning and Coating Operations

Maintenance and rework of military aircraft for NAS Whidbey Island occurs at Ault Field and includes cleaning and painting smaller sections of various aircraft to address maintenance repairs and corrosion. In addition, cleaning and coating of ground support equipment and government fleet vehicles occur at Ault Field, and the Sea Plane Base, respectively.

Cleaning, coating and waste handling activities are broken down, as follows:

- Cleaning activities include abrasive blasting, stripping tanks, cleaning furnaces/ovens, spray gun cleaning in enclosed gun cleaners, flush parts cleaning and hand-wipe cleaning.
- Coating activities include dipping tanks, mixing coatings, priming and painting, either in a paint booth, or if on the aircraft itself, within a hangar.
- Waste handling activities include transfer, handling and storage of wastes to reduce or minimize VOC and HAP emissions.

Cleaning, coating and waste handling activities may be regulated under Aerospace NESHAP requirements and NWCAA Section 508 Surface Coating Operations regulations depending on what equipment is being cleaned/coated, where it is being cleaned/coated, etc. In addition, some equipment may have received an OAC with operational requirements from NWCAA.

Cleaning and coating operations are subject to Aerospace NESHAP, 40 CFR 63 Subpart GG when using subject materials. Hand-wipe cleaning requirements under Subpart GG include housekeeping and specify allowable cleaning solvents. Requirements from NWCAA Section 508 Surface Coating Operations also apply to cleaning and coating activities across the base.

There are three paint booths at NAS Whidbey Island that require emission controls under NWCAA Section 508 and under Aerospace NESHAP when they spray coatings that contain an inorganic HAP such as chromium. The two FRCNW Waterwash Paint Spray Booths (BTH-2547-02 & -03) control emissions using a waterwash 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.

Work is performed in the following cleaning and coating emission units on aerospace equipment at Ault Field; these emission units are subject to Aerospace NESHAP and NWCAA Section 508 cleaning and coating requirements:

- Fleet Readiness Center Northwest (FRCNW) Waterwash Paint Booths (BTH-2547-02 and BTH-2547-03) – These two paint booths are located at the FRCNW 51B Workcenter and use a waterwash 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 waterwash paint booths.

- FRCNW Composite Shop Booth (BTH-2818-01) – This booth is located at the FRCNW 51F Workcenter and uses 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, approved in OAC 1131. 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.
- ARE-AERO – designates the activities associated with cleaning using solvents and painting of portions of aircraft within Hangars on base.

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". NAS Whidbey Island has not requested any such allowance for painting outside booths so this is not accommodated in the AOP.

The Aerospace NESHAP and NWCAA Section 508 allow touchup painting outside of a booth under specific conditions, i.e. small painting pens, roll-on and non-refillable aerosol cans, and NAS Whidbey Island commonly uses these methods of painting outside the booths, inside of hangars, for aircraft maintenance by squadrons. If painting occurs in a hangar, it 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, and
- Either not considered "spray coating" by definition (if roll-on, aerosol can, marking pen is application method used) and therefore NWCAA Section 508 is not applicable, or, if HVLP spray gun were applying coating, excepted from NWCAA 508.4(A)(1) enclosure requirements per NWCAA 508.4(A)(1)(f) Inside Exhaust; other requirements (application methods, equipment cleanup and waste) would still apply.

Common cleaning activities associated with maintenance and rework of military aircraft at Ault Field that are not regulated under aerospace NESHAP due to exemptions include;

- Flush (parts) cleaners using non-HAP solvents. Most flush cleaners at the facility use MIL-PRF-680 (Stoddard solvent), a hydrocarbon-based solvent that contains no HAPs - this activity is exempt under 63.741(f). Will still have waste storage and handling to minimize emissions of VOC requirements under NWCAA Section 508
- Hand wiping activities using isopropyl alcohol in hangars when preparing portions of an aircraft for painting. Isopropyl alcohol is not a HAP - this activity is exempt under 63.741(f). Will still have waste storage and handling to minimize emissions of VOC requirements under NWCAA Section 508
- Glove box abrasive blast units (glove box blasters) at NAS Whidbey Island < 200 cubic feet in size. Their size limits their use to "parts or units normally removed from the aerospace vehicle for depainting"- these units are exempt from the depainting requirements of the Aerospace NESHAP. These units are below NWCAA NSR permitting thresholds and may be listed as IEUs in Section 7.

Other activities subject to Aerospace NESHAP that do not occur at Ault Field (or anywhere at NAS Whidbey Island) include:

- 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. NAS Whidbey Island 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 - NAS Whidbey Island does not conduct chemical milling maskant application operations and Aerospace NESHAP requirements for this activity do not apply.

A discussion follows of cleaning and coating equipment for which NWCAA has issued approval orders.

OAC 1131 (8/20/12) – Paint Spray Booth (BTH-2818-01). This booth was installed at NAS Whidbey Island 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. NAS Whidbey Island 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 a differential pressure gauge across each of the three filter banks with pressure readings taken during each painting shift.

Other cleaning and coating activities that occur on non-aerospace equipment (and therefore not subject to requirements from the Aerospace NESHAP) at Ault Field include the following emission units:

- Steel-shot Abrasive Blast Booth (RBL-0995-91), controlled by cartridge filter dust collector approved in OAC 755a, used to remove paint from ground support equipment.
- Pyrolysis Cleaning Furnace (FRN-0995-02), natural gas-fired furnace with afterburner emission control approved in OAC 755a, used to clean paint from ground support equipment.
- Powder coating booth (PCB-0995-01), originally installed at 900 Division in Building 995; replaced with a new booth (PCB-0995-02) in 2013 (no OAC required – booth vents indoors and not subject to the Aerospace NESHAP). Ground support equipment is electrostatically painted in booth with residual paint powder captured on dry filtration system. NWCAA 508 does not apply to powder coating booth (by definition, powder coating is not considered a "spray coating operation")
- Powder Coating Curing Oven (FRN-0995-01), natural gas-fired, approved in OAC 755a to cure powder-coated paint onto ground support equipment.

A discussion of OAC 755a issued by NWCAA for this equipment (except powder coating paint booth) follows.

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 NAS Whidbey Island 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.

Cleaning and coating activities that occur at the Sea Plane Base are included for the following emission unit:

- Transportation Maintenance Paint Booth (BTH-0018-01), including a ventilated paint mixing room and paint booth with dry filtration system approved in OAC 1081 used for painting and touch-up of government fleet vehicles, generally as part of collision or corrosion repair. Booth is also used to repair and repaint waste collection dumpsters.

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 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.

4.3. Gasoline Dispensing Stations

There are three gasoline dispensing facilities (GDFs) at NAS Whidbey Island: two at Ault Field (the Naval Exchange (NEX) AutoPort station and the government fleet facility) and one at the Seaplane Base (the NEX SPB gasoline station). Both NEX stations are considered high volume GDFs. Dispensing gasoline into vehicles and loading gasoline into aboveground storage tanks are considered emission units. The gasoline storage tanks at NAS Whidbey Island are;

Ault Field NEX gasoline dispensing facility storage tanks:

- GAS-2929-01, -02A&B, and -03 are 8,000, 12,000 (A 4,000 gallon diesel and B-8,000 gallon gasoline) and 12,000 gallon, respectively, above ground storage tanks equipped with Stage I enhanced vapor recovery (EVR) equipment, designed with standing loss controls (SLCs) and the fuel dispensers are equipped with low-permeation hoses, permitted under OAC 1372a.

Ault Field government fleet gasoline dispensing facility storage tanks:

- GAS-2622-01 and GAS-2623-01 are 10,000 gallon above ground storage tanks equipped with Stage I enhanced vapor recovery (EVR) equipment, designed with

standing loss controls (SLCs) and the fuel dispensers are equipped with low-permeation hoses, permitted under OAC 1378a. This gasoline dispensing facility is used for refueling government vehicles.

Seaplane Base NEX gasoline dispensing facility storage tanks:

- AST-2813-01, -02, -03 and -4 are 8,000, 8,000, 12,000 and 10,000 gallon above ground storage tanks equipped with Stage I vapor recovery equipment permitted under OAC 1030.

The NEX GDFs are subject to requirements from NWCAA Section 580.6 Gasoline Dispensing Facilities and WAC 173-491-040(4) Gasoline Dispensing Facilities (Stage I) and (6)(e) Preventing Evaporation. The Government Fleet Facility, a low volume GDF with an annual throughput typically less than 20,000 gallons and which does not market or sell gasoline, is not subject to the requirements of WAC 173-491; however, NWCAA Section 580.6 does apply, as NAS Whidbey Island is a facility with an annual 12-consecutive month gasoline throughput (all GDF combined) equal to or greater than 120,000 gallons.

In addition, the requirements of NWCAA 580.10 apply, as all 3 GDFs at NAS Whidbey Island are subject to NWCAA 580.6 and each are subject to specific requirements listed in each OAC issued by NWCAA, as discussed below.

OAC 710 (9/1/99) – Seaplane Base gasoline station. OAC 710 was approved for construction of (3) above ground storage tanks (ASTs), dispensers and piping controlled using dual point Stage I vapor recovery and Tolkeim MaxVac Stage II vapor recovery system.

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 equipment 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 644a (10/29/09) – Ault Field Naval Exchange gasoline station. OAC 644a allowed removal of Stage II vapor recovery equipment at the Ault Field NEX. “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 stored fuel that is 85% ethanol, 15% gasoline. The Ault Field Navy Exchange gasoline station was 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 was also required on the E85 storage tank. With

issuance of OAC 1372a on September 20, 2022, the (3) USTs were removed and the E85 AST was converted to diesel storage, therefore OAC 644a is not included in the 2023 AOP renewal.

OAC 1372a (9/20/22) – (3) new ASTs: 12,000 gallon (AST-2929-01), 12,000 gallon split compartment: 4,000 gallon diesel (AST-2929-02A) and 8,000 gallon gasoline (AST-2929-02B), and 10,000 gallon gasoline (AST-2929-03); and (1) existing AST: 6,000 gallon diesel (AST-2929-04). This OAC was issued September 24, 2021 for the Ault Field NEX and included an existing E85 AST (2595-08). The OAC required each of the new tanks to be installed and maintained in good operating condition with standing loss controls (SLCs) and Stage I enhanced vapor recovery (EVR) equipment tested according to a throughput-based schedule to assure vapor collection system integrity, and incorporated requirements for the existing E85 AST from OAC 644a issued October 29, 2009. During the revision, the existing E85 AST was converted to store diesel and assigned a new tank ID number (AST-2929-04). In addition, low-permeation hoses were required, as the base gave notice that they were intending to replace the existing fueling dispensers. These tanks replaced (3) USTs (approved under OAC 644a) with a combined gasoline storage capacity of 20,000 gallons.

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, issued January 24, 1998, superseded OAC 450b. OAC 646 established requirements for Stage I vapor recovery on two underground gasoline storage tanks (GAS-2622-01 and 2623-01) at the government fleet gasoline station. OAC 646 requires Stage I equipment be maintained and operated in accordance with state and local rules as defined in WAC 173-491 and NWCAA section 580. These tanks were decommissioned in 2023 when the replacement ASTs were installed under OAC 1378a issued June 12, 2022, therefore OAC 646 is not included in the 2023 AOP renewal.

OAC 1378a (7/12/22) – (2) 10,000 gallon gasoline above ground storage tanks (AST-2622-01 and AST-2623-01). The OAC was issued December 12, 2021 for the Ault Field Government Fleet fueling facility and required that each tank be installed and maintained in good operating condition with standing loss controls (SLCs) on the tanks, low-permeation hoses on fuel dispensers and Stage I enhanced vapor recovery (EVR) equipment tested according to a throughput-based schedule to assure vapor collection system integrity. OAC 1378a was issued July 12, 2022 to allow another approved Stage I EVR system to be installed with the ASTs (CARB EO VR-402 for Morrison Bros components versus CARB EO VR-401 for OPW components). These tanks replaced (2) 25,000 gallon gasoline USTs installed under OAC 646 issued January 24, 1998.

4.4. Stationary Reciprocating Internal Combustion Engines (RICE)

Throughout Ault Field, Area 6, and the Seaplane Base, NAS Whidbey Island operates and maintains many stationary⁶ diesel-fired, compression ignition (CI) reciprocating internal

⁶ 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.

combustion engines (RICE). 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 uninterruptible 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 five non-emergency, compression ignition (CI) engines at the base. Two at the compost facility in Area 6, one at the Ault Field Recycle Center, one at the Central Heating Plant at Ault Field and one at the Administration/Operations/Radar Center Building 385. There is also a fire pump CI engine located at Hanger 6. There are two natural gas-fired stationary spark ignition (SI) engines: one at the SPB Elmer Site/Saratoga Heights Base Housing Water Tower and one at Simard Hall at Ault Field. There are eight 4-stroke, gasoline-powered, stationary SI engines used in the Aircraft Arresting Gear Systems (four systems, two engines per system) at Ault Field.

All of the stationary RICE located at NAS Whidbey Island are listed in Section 1 of the AOP and all are affected sources under 40 CFR 63 Subpart ZZZZ (RICE MACT). Because NAS Whidbey Island is a major source of HAP (single and combined), RICE are further classified into existing or new/reconstructed, based on whether the RICE was constructed (ordered) before December 18, 2002 for RICE > 500 hp or June 12, 2006 for RICE ≤ 500 hp. Up until 2007, new emergency engines at NAS Whidbey Island were approved under OACs. On November 8, 2007, the NWCAA adopted a revision to NWCAA Section 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.

Some existing, emergency RICE are affected sources under RICE MACT though not subject to any of the listed requirements, so long as the engine(s) continue to operate meeting the definition of "emergency RICE", per 63.6590(b)(3)(iii).

Newer engines - ordered after July 11, 2005 for engines manufactured April 1, 2006 or later (if not a fire pump engine); or manufactured as certified NFPA fire pump engine after July 1, 2006 - are affected facilities under 40 CFR 60 Subpart IIII (NSPS IIII), and therefore subject to both RICE MACT and NSPS IIII.

Other engines must meet the requirements of RICE MACT by meeting the requirements of 40 CFR 60 Subpart IIII (NSPS IIII) :

- New, emergency CI engines ≤ 500 hp, under 63.6590(c)(6)
- New CI engines ≤ 500 hp, under 63.6590(c)(7)

At NAS Whidbey Island, the RICE under this scenario were already affected facilities under NSPS IIII.

In addition, some new, larger (> 500 hp), emergency RICE that are affected sources under RICE MACT and affected facilities under NSPS IIII do not have any applicable requirements under RICE MACT, per 63.6590(b)(1)(i) - other than initial notifications under 40 CFR 63 Subpart A - therefore, the only applicable requirements for these units are from NSPS IIII.

The Table in Section 1 is separated into categories according to which categories in 40 CFR 63 Subpart ZZZZ and 40 CFR 60 Subpart IIII the engine falls.

The table includes the following information.

- Description, Location: This column lists the service use of the engine and where it is located.
- 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. Manufacture dates are used to identify engine emission standard/certification tier thresholds. 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 NAS Whidbey Island⁷. 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.
 - Federal RICE applicability (NSPS Subparts IIII & JJJJ, & MACT ZZZZ)

Note special discussion regarding regulatory applicability for (8) 65 hp gasoline 4-stroke SI engines in Aircraft Arresting Gear Systems.

A discussion of approval orders issued by NWCAA for RICE follows.

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. OAC 528a was issued 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.

One-time only/already satisfied OAC conditions not included in AOP: Condition 1 is not included in the AOP as it 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.

⁷ 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.

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.

One-time only/already satisfied OAC conditions not included in AOP: Condition 1 is not included in the AOP as it 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.

One-time only/already satisfied OAC conditions not included in AOP: Condition 1 is not included in the AOP as it 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 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 NAS Whidbey Island 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 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 1100 (9/9/11) – Wood chipper (WOO-2555-02). During the June 29, 2011 site inspection of NAS Whidbey Island, it was discovered that a new wood chipper had replaced the existing, permitted wood chipper. NAS Whidbey Island 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.

4.5. EUs & Activities with No Specifically Applicable Requirements

These emissions unit and activities are listed in Table 1-1 of the permit and are only subject to the generally applicable requirements that apply site-wide in Section 4 of the AOP.

Aircraft Arresting Gear Systems – Engine Regulatory Applicability

NAS Whidbey Island operates four arresting gear systems on at the airfield – one on each runway. Arresting gear systems are used to rapidly decelerate aircraft as it lands and are found on both aircraft carriers (used for routine landings) and land-based airfields (for emergencies involving landing gear problems or hypoxic pilot). Each arresting gear system is comprised of (2) 65 hp 4-stroke gasoline engines, absorbers, tape drums, tape, and an arresting pendant/cable that lays across the runway. The engine retracts the tape on each side of the runway following an aircraft arrest. Arrest rates average approximately 22 per year; the engines run for approximately 5 minutes to respool tape following an arrestment and approximately 10 minutes every quarter when tape is respooled following maintenance when the tape is pulled completely off the drum for integrity inspection.

The arresting gear systems were installed in the 1960s and components of the systems, including the engines, are replaced on a 10 – 15 year cycle. The engines were last replaced in 2010. As such, the engines are new (constructed after 6/12/06) spark ignition (SI) stationary RICE subject to Regulations under 40 CFR 60 Subpart JJJJ, in accordance with the RICE MACT, §63.6590(c)(4).

Under Subpart JJJJ, the engines are exempted as “replacement engines” per §60.4230(e), however, the current version of Subpart JJJJ does not reflect the version in effect at the time the engines were last replaced (2010). Specifically, language was added to Subpart JJJJ that became effective March 10, 2014 that restricted the application of the exemption to equipment that was 40 years old or less at the time of installation. As this 40-year limitation was not included in the exemption at the time the engines were last replaced, the exemption stands and the engines will lose this exemption at the next replacement, resulting in the next replacement of arrest gear engines becoming subject to the full emission standards required by 40 CFR 60 Subpart JJJJ. Until that time, only the generally applicable requirements in Section 4 apply to these engines.

Aircraft Engine Test Cells and Stands & P-8 Preservation using MSUs

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-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-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 fuel.

There are only generally applicable requirements in Section 4 that apply to the aircraft engine test cells and stands.

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 NAS Whidbey Island. References to OAC 260 and its requirements were removed from the AOP in the 2018 renewal.

Mobile Air Start Units (non-road engines) and P-8 Engine Preservation

NAS Whidbey Island utilizes mobile air start units (MSUs), also known as ground start units, at T-10 jet engine test cell (ETC-2765-01) for CFM56 P-8 engine preservation and at T-17 engine test cell (ETC-2525-02) for testing and maintenance of T-56 turbojet engines. MSUs are also used around the base to perform testing, cleaning and/or functional checks on aircraft engines. The units are multipurpose, trailer-mounted gas-turbine powerheads used routinely with aircraft (military and commercial) to provide bleed air for aircraft main engine starts, to supply onboard environmental control systems with compressed air, etc. The MSUs run on jet fuel and are considered non-road engines, which based on EPA guidance, are not subject to regulation as a stationary source.

A MSU is used in the P-8 engine preservation process. The P-8 engine preservation process is used to store spare CFM56 engines for Boeing Poseidon aircraft "ready for issue" (RFI) for up to one year. NAS Whidbey Island maintains two such preserved engines in their RFI inventory.

To store the jet engines "RFI", the engines are drained of oil, "wind-milled" to flush-out any remaining oil, then a mist of 1010 (preservation oil) is circulated throughout the jet engine to coat all the engine parts to protect against rust and corrosion while it is stored. As the mist of 1010 completely fills the engine, the mist is emitted from the engine "exhaust", at which point (after ~1 hr) personnel consider the preservation process complete and the engine is shut off.

In order for the jet engine to turn during the process without combusting fuel, an MSU is used to deliver sufficient bleed air to start the P-8 engine, allowing the engine to be driven pneumatically. The T-10 jet engine test cell (ETC-2765-01) is used to perform the preservation. The P-8 jet engine is preserved inside the engine test cell, the MSU is parked outside the test engine cell and bleed air is supplied to the P-8 through an air supply line.

The only emissions from the process itself come from combustion of jet fuel in the MSU, a non-road engine.

Fire Training Facility

The Center for Navy Aviation Technical Training (CNATTU) provides Navy personnel, including sailors, with training in firefighting techniques for aircraft crash rescues on ships at NAS Whidbey Island. 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, NAS Whidbey Island 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 mobile aircraft firefighting training device (MAFTD) powered by propane, which provides controlled combustions.

Additionally, Navy Region Northwest Fire and Emergency Services (NRNW F&ES) is considered the base fire department. As part of their core duties, they are required to train consistently per National Fire Protection Association (NFPA) standards and at periodic intervals that ensure all assigned firefighters are proficient in various firefighting environments as per their standards of coverage. These environments encompass structural, airport/aircraft, shipboard, and wildland firefighting.

NRNW F&ES can only conduct live fire operations in accordance with Navy instructions for two propane fired MAFTD: Helo and F-18: which are located on a taxiway on the airfield at NAS Whidbey Island. Structural, wildfire and Class A live fire training activities are conducted offsite at other training sites outside NAS Whidbey Island.

Under RCW 70A.15.5180, fire training activities to fight aircraft crash rescue fires do not require a permit from an air pollution control authority nor are petroleum products prohibited from being burned during fire training, if all of the following conditions are met:

- Firefighters participating in the training fires are limited to those who provide firefighting support to an airport that is either certified by the federal aviation administration or operated in support of military or governmental activities;
- The fire training is not conducted during an air pollution episode or any stage of impaired air quality declared under RCW 70A.15.6010 for the area where training is to be conducted;
- The number of training fires allowed per year without a permit is the minimum necessary to meet federal aviation administration or other federal safety requirements;
- The facility uses current technology and is operated in a manner that minimizes, to the extent possible, the air contaminants generated during operation; and

- The organization conducting training notifies both the:
 - Local fire district or fire department; and
 - Air pollution control authority, Department of Ecology, or local entity delegated permitting authority under RCW 70A.15.5100, having jurisdiction within the area where training is to be conducted before the commencement of aircraft fire training. Written approval from the Department or local air pollution control authority shall be obtained prior to the initial operation of aircraft crash rescue fire training. Such approval will be granted to fire training activities meeting the above conditions.
- Aircraft crash rescue fire training activities conducted according to the conditions bulleted above are not subject to the prohibition in RCW 70A.15.5010(1), of outdoor fires containing petroleum products and are not considered outdoor burning under RCW 70A.15.5010, 70A.15.20, 70A.15.30, 70A.15.40, 70A.15.50, 70A.15.60, 70A.15.70, and 70A.15.80.
- Training to fight structural fires located outside urban growth areas in counties that plan under the requirements of RCW 36.70A.040 and outside of any city with a population of ten thousand or more in all other counties does not need a permit from an air pollution control authority or the Department of Ecology, but must be conducted in accordance with RCW 52.12.150.
- Training to fight forest fires does not require a permit from an air pollution control authority or the Department of Ecology.
- To provide for firefighting instruction in instances not governed under aircraft crash rescue or structural fire training, or other actions to protect public health and safety, the department or a local air pollution control authority may issue permits that allow limited burning of prohibited materials listed in RCW 70A.15.5010(1).

As such, in order for NAS Whidbey Island to perform the above-mentioned fire training activities and as well as burn petroleum products without first obtaining a fire training permit, the above conditions must be included in the AOP as applicable requirements.

In instances where the applicable requirements do not include any federally enforceable means of “reasonably assuring continuous compliance” with the underlying requirements, monitoring is added under the “gap-filling” authority in WAC 173-401-615. In this case, a MR&R term was developed to require retention of a record that documents that each of the items listed above were met during each fire training activity for which a fire training permit was not required/obtained.

Explosive Ordnance Demolition Unit

The NAS Whidbey Island Seaplane Base hosts the Explosive Ordnance Disposal (EOD) Unit Northwest which provides emergency recovery and render-safe demolition of previously-discharged marine markers and other unplanned ordnance. The Department of Defense munitions (those that are determined to be safe for transport, collected from states in the northwest region – Alaska, Idaho, Oregon and Washington) are transported tot a designated demolition pit for demolition. The demolition pit is located in an open field 600 yards from the Seaplane Base boundary fenceline. There is also a burn pit within 200 yards where previously-discharged marine markers were burned using thermite under an Outdoor Fire

Permit issued by NWCAA, from 1994 – 2012, until state and local outdoor burning regulations exempted this activity from permitting.

The military ammunition and unexploded ordnance (UXO) that are processed in the designated demolition pit is 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 NAS Whidbey Island or at other DOD facilities. As part of the training, EOD personnel receive detailed instruction on the proper and safe disposal of UXO found in the region. 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.

Ozone Depleting Substance Equipment

NAS Whidbey Island 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. NAS Whidbey Island 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 NAS Whidbey Island complaint hotline to report odors, fugitive dusts, or other nuisance air contaminants that likely originate from NAS Whidbey Island. Anyone impacted by air emissions related to NAS Whidbey Island activities at home, school, or work should contact NWCAA at (360) 428-1617 and the NAS Whidbey Island complaint hotline at (360) 257-6665.

5. AIR OPERATING PERMIT ADMINISTRATION

In developing the AOP for NAS Whidbey Island, NWCAA developed assumptions for the AOP and established permit elements. A description follows.

5.1. Permit Assumptions

The permit contains standard terms and conditions (Sections 2 and 3), generally applicable requirements (Section 4) and specifically applicable requirements (Section 5) for emission units located at NAS Whidbey Island. Applicable requirements that were satisfied by a single past action on the part of the source (“one-time only” requirements) are not included in the

permit but are discussed in this Statement of Basis. An example of a one-time only requirement that has already 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 is a one-time action that has been completed. Regulations that require action by a regulatory agency, but not by the regulated source, are not included as applicable permit conditions. Requirements from permits (OACs) that have been superseded are not considered applicable requirements and are not included in the AOP.

5.2. 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. For the Washington Administrative Code (WAC) regulations, the date listed in parenthesis in the air operating permit represents the State Effective date. For the 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. The date associated with an OAC permit represents the issuance date of that new source review construction permit. For a federal rule, the date is the rule section’s most recent promulgation date.

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 WAC or the NWCAA Regulation. As such, those citations that have been federally approved (i.e., incorporated into the SIP) are federally enforceable; the date listed is when it was incorporated into the SIP. If the rule has subsequently changed, those changes are enforceable only by the state or NWCAA; the date listed is the current version and is identified as “State only”.

Applicable requirements that have been promulgated with future effective compliance dates may be included as applicable requirements in the AOP with a reference stating when compliance needs to be demonstrated. Some requirements that are not applicable until triggered by an action, such as the requirement to file a Notice of Construction application prior to building a new emission unit, are addressed within the standard terms and conditions section of the AOP.

NAS Whidbey Island did not request emissions trading provisions or specify more than one operating scenario in the AOP application; therefore the permit does not address these options as allowed under WAC 173-401-650. There are certain emission units that are

permitted to operate in different modes; for those units, both scenarios are written into the permit with a recordkeeping requirement to document under which scenario the emission unit is operating.

This permit does not condense overlapping applicable requirements (streamlining) nor does it provide any alternative emission limitations.

5.3. Gap Filling

Title V of the Federal Clean Air Act is the basis for 40 CFR Part 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 air operating permit for that source. Title V also requires that each applicable regulation be accompanied by a federally enforceable means of “reasonably assuring continuous compliance”. 40 CFR Part 70 and WAC 173-401-615 all contain a “gap-filling” provision to address situations where no monitoring is present. 40 CFR Part 70.6(c)(1) and WAC 173-401-630(1) contain authority to address situations where monitoring exists, but is deemed to be insufficient. NWCAA relied upon these authorities to add monitoring where needed to the air operating permit (AOP).

The majority of cases where monitoring needed to be added were older regulations, permits and NWCAA tank requirements that contained no monitoring. For example, NWCAA used its gap-filling authority to add monitoring for the 20% visible emission standard, NWCAA 451.1. The term “Directly Enforceable” is included in each AOP term where NWCAA added gap-filling.

There were also some limited cases where monitoring did exist but was found to be insufficient. NWCAA used its sufficiency monitoring authority (WAC 173-401-630(1)) to add monitoring in those cases. “Directly Enforceable” is included in the AOP term when NWCAA used its authority to supplement insufficient monitoring.

The type and frequency of monitoring added under the authorities in WAC 173-401-615 and WAC 173-401-630(1) were set based on the following factors:

1. Historical Compliance of similar equipment – NWCAA reviewed this and other facilities past compliance with the underlying requirement for similar equipment. This information helped inform the decision about monitoring frequency and stringency.
2. Margin of Compliance – The margin of compliance is a measure of whether the facility can easily achieve compliance with a requirement, or whether they operate close to an exceedance. NWCAA considered the facility’s margin of compliance for each underlying requirements in setting monitoring for that requirement.
3. Variability of Process and Emissions – Processes that vary their production rates and/or emissions over time (e.g., batch loading of grain silos, VOC emissions from lumber drying kilns) require different monitoring from steady-state processes. NWCAA considered process and emission variability in setting monitoring.
4. Environmental Impact of a Problem – Exceedances of some permit requirements have greater environmental consequences than others. For example, a problem that causes an exceedance of a refinery sulfur plant limit could have a greater environmental impact than failing to use ultra-low sulfur diesel at an emergency generator. NWCAA considered the environmental impact of a problem in setting monitoring.
5. Clarity and Complexity – The requirements that apply to AOP facilities are numerous, varied, and can be complex. The greater number, variety, and complexity of

requirements, the harder it is for a facility to understand and comply. NWCAA's goal is to write clear, concise permits the facilities can understand. To help achieve this goal, when possible, NWCAA aligned additional monitoring with monitoring that the facility is already performing. This approach required careful thought. NWCAA reviewed the monitoring the facility is already performing to see if it was adequate to stand-in as monitoring for the permit term, and only used it if deemed adequate. For example, an older storage tank may have a NWCAA construction permit that didn't list monitoring. The same tank may also be subject to 40 CFR 60 Subpart Kb. Subpart Kb monitoring would only be used as the gap-filled (or sufficiency monitoring) if we found it was adequate to show compliance with the construction permit.

Table 5-1 lists where in the AOP NWCAA used its gap-filling monitoring authority.

Table 5-1: Gap-filling under WAC 173-401-615

AOP Terms	Description	Monitoring
4.2	Operation & maintenance	Monitor, keep records & report
4.3-4.4, 4.6-4.11, 5.2.21, 5.2.46	Nuisance (contaminants, odors, PM, fugitives)	Written air contaminant response plan
4.5	In-vessel composting, compost tipping/mixing bldg. & curing/screening pad O&M	Perform daily & weekly monitoring, maintain biofilter SOP, retain records of monitoring
4.12-4.14, 4.16-4.17	Visible emissions	Visible emission observation monitoring
4.18-4.20	Emissions of sulfur compounds	Monitor & record concentration of stack SO ₂ , or alternately, fuel gas H ₂ S
4.21-4.22	Sulfur in fuel	Retain fuel specifications & purchase records
4.23	Fire training without a permit	Retain training documentation
5.2.5	Equipment cleanup & waste storage & disposal	Retain records of inspection frequency, inspection procedures, recordkeeping & reporting
5.2.18	Spray booth enclosure requirements	Retain records of spray booth operation & maintenance
5.2.20	Spray equipment cleaning	Retain records of inspection frequency, inspection procedures, recordkeeping & reporting
5.2.25	Operate equipment per manufacturer's O&M manuals	O&M manuals available at all times to equipment operators
5.2.40	Spray application method	Retain records documenting use of compliant methods.
5.2.41-5.2.42	Spray equipment cleaning	Monitor & record monthly inspections of spray gun cleaning equipment & storage.
5.2.44	Paint & solvent housekeeping	Monitor & record monthly inspections of coatings, solvent & waste storage.

AOP Terms	Description	Monitoring
5.3.1, 5.3.3-5.3.4, 5.3.7, 5.3.13, 5.3.16	Gasoline dispensing & transfer requirements	Retain records of monthly inspections, leaks repaired, static pressure decay tests conducted & corrective action taken
5.3.2, 5.3.17	Transport Tank Certification	Record inspection of leak test certificate or observe certification sticker during monthly transport tank unloading
5.3.6	Preventing evaporation	Retain records of monthly spill bucket inspections & corrective action taken
5.3.7, 5.3.14	Maintain Stage I EVR in good operating condition	Retain records of inspections, leaks repaired & corrective action taken
5.4.5, 5.4.23, 5.4.33	Sulfur fuel content limit	Retain records of fuel type combusted & sulfur content
5.4.6, 5.4.24,	Engine specifications	Retain records of compliance with standards, manufacturer's written instructions & log of maintenance & repair activity.
5.4.10	Fugitive particulate control	Retain records of dust suppression use & results of use, or if not used, explanation of why they were not needed
5.4.12, 5.4.22, 5.4.26, 5.4.32, 5.4.38, 5.4.40	Engine hours limit	Retain records of run hours & engine service (emergency, non-emergency, etc)
5.4.41	Minimize engine time at idle and startup	Retain records of time spent at idle and during startup.

Table 5-2 lists where in the AOP NWCAA used its sufficiency monitoring authority.

Table 5-2: Gap-filling under WAC 173-401-630(1)

AOP Terms	Description	Monitoring
4.1	Required monitoring reports	Reporting periods identified
4.15	PM emissions	VE observation monitoring
4.24	Storage & disposal of VOC containing material from spray coating operations	Monitor, record & retain monthly covered/sealed paint, solvent & waste containers.
5.1.7, 5.1.13, 5.2.28, 5.4.4, 5.4.8-5.4.9, 5.4.14, 5.4.17, 5.4.20, 5.4.30	Visible emissions	VE observation monitoring
5.2.1	HAP-containing housekeeping	Monitor, record & retain monthly covered/sealed paint, solvent & waste containers.

5.2.9	Spray application method	Retain records documenting use of compliant methods.
5.2.14, 5.2.37	Spray booth enclosure requirements	Record & retain documentation when spray coating occurs outside required enclosures
5.2.15, 5.2.32	Spray booth visible emissions	Monitor & records spray booth gap checks monthly
5.2.16	Coating waste handling	Monitor, record & retain monthly covered/sealed paint, solvent & waste containers.
5.2.17	Spray booth filtration	Retain records of spray booth operation & maintenance
5.2.38	Spray coating outside filtered spray enclosure	Record & retain records of spray coating performed outside booth.
5.3.8, 5.3.14	Stage I EVR O&M	Retain records of monthly inspections, leaks repaired, static pressure decay tests conducted & corrective action taken
5.3.11, 5.3.19	Preventing evaporation	Retain records of inspections, leaks repaired & corrective action taken;
5.4.1, 5.4.27	Minimize engine time at idle and startup	Retain records of time spent at idle and during startup.
5.4.11	Fugitive particulate control	Retain records of date & time dust observed & corrective action(s) taken

5.4. 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

AOP Sections 2 through 5 include citations to applicable requirements (e.g., regulations and OACs) and a summary of that requirement. In addition, AOP Sections 4 through 5 include the monitoring, recordkeeping and reports (MR&R) obligations for each requirement.

5.5. Permit Information & Attest

The Permit Information page identifies the facility, 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 NWCAA's authorization for the source to operate under the terms and conditions contained in the permit.

5.6. 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 NAS Whidbey Island, air pollution controls, fuel type, applicable regulations, related comments 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 in 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 NAS Whidbey Island 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

BOI = Boilers

BTH = Spray coating booth

CHL = Chiller

CLN = Gun or parts cleaner

COMP = Compost equipment

DEG = Degreasing unit

DEI = Deicing

EPL = Brush/selective electroplating

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

5.7. AOP Section 2 - Standard Terms & Conditions

The Standard Terms and Conditions section contains administrative requirements and prohibitions that do not generally have ongoing compliance monitoring requirements. The citations giving legal authority to the standard terms and conditions are provided in the section. 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."

5.8. AOP Section 3 - Standard Terms & Conditions for NSPS & NESHAP

This section contains generally applicable administrative requirements or prohibitions with no ongoing compliance monitoring requirements taken from the "General Provisions" of Subpart A of 40 CFR 60, Subpart A of 40 CFR 61, and Subpart A of 40 CFR 63. They apply specifically to the affected sources, affected facilities, or stationary sources subject to the standards of 40 CFR Parts 60, 61, and.

5.9. AOP Section 4 - Generally Applicable Requirements

AOP Section 4 entitled “Generally Applicable Requirements” identifies requirements that apply broadly facility wide. These requirements are generally not called out in OACs and instead are found as general air pollution rules in the NWCAA Regulation or the Washington Administrative Codes.

When referring to the tables in AOP Sections 4 and 5, the first column lists the AOP term number and pollutant or type (e.g., fuel use restriction) of requirement. The AOP terms are numbered consecutively to individually identify each requirement and so that the reader may easily locate a referenced term. Next, the citation column includes the legal citation which is a federally enforceable requirement unless listed as “State Only”. The “description” column is a paraphrase of the requirement for informational purposes only; the language of the cited regulation takes precedence over a paraphrased requirement.

The last column lists the monitoring, recordkeeping and reporting (MR&R) requirements. The MR&R is a summary of the MR&R from the underlying requirements cited in the “citation” column and is not enforceable – the language of the cited regulation takes precedence over a paraphrased requirement. However, when there is text in the MR&R column that states “Directly Enforceable”, all text below that statement has been added by NWCAA under the agency's gap-filling authority (discussed above), found in WAC 173-401-615(b) and WAC 173-401-630, and these gap-filled requirements are enforceable.

In some cases there are no MR&R or test methods listed in the AOP for a permit term. This is often due to the nature of the emission source, the lack of specifics in the underlying requirement, and/or the slim likelihood that the legal requirement will be violated. Note that the facility must certify annual compliance with each term even if there are no explicit MR&R requirements.

5.10. AOP Section 5 - Specifically Applicable Requirements

AOP Section 5 entitled “Specifically Applicable Requirements” lists requirements that are specific to the individual emission units. Each table in AOP Section 5 represents an emission unit or category of emission units (grouping of similar emission units such as RICE).

The emission limitations and MR&R requirements are derived from the underlying requirements that are cited in the first column. As with 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.

5.11. 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. If requested by the source, Section 6 of the permit will list requirements deemed inapplicable based on the applicability of the cited regulation.

5.12. Equipment Permanently Shutdown

Table 5-3 lists emission units at NAS Whidbey Island that have been permanently shutdown according to NWCAA regulation 325 since the previous AOP issuance.

Table 5-3 Equipment Permanently Shutdown at NAS Whidbey Island

Equipment ID	Description	Associated OAC†	Effective Date of Shutdown
BOI-0993-01	Boiler, 8.369 MMBtu/hour, natural gas/ULSD - NHCOH	OAC 243	2017
BOI-2621-01	Boiler, 0.60 MMBtu/hour, diesel-fired - Liquid oxygen area	None	2017
BOI-2771-01	Boiler, 0.45 MMBtu/hr, natural gas-fired – Tactical Support Center	None	2017
BOI-0112-01	Boiler, 0.94 MMBtu/hour, natural gas-fired – Hangar 1	None	2018
BOI-0384-06	Boiler, 54.80 MMBtu/hour, natural gas/jet fuel backup - CHP	OAC 594	2019
BOI-0384-07	Boiler, 54.80 MMBtu/hour, natural gas/jet fuel backup - CHP	OAC 594	2019
BOI-2837-01	Boiler, 2.10 MMBtu/hour, natural gas-fired – Survival Pool	None	2020
BOI-2387-02	Boiler, 0.65 MMBtu/hour, natural gas-fired – Survival Pool	None	2020
BOI-0124-02	Portable Boiler, 2.94 MMBtu/hr, ULSD	None	2021
BOI-0410-01	Boiler, 0.70 MMBtu/hour, natural gas-fired – Hangar 6	None	2021
BOI-0410-02	Boiler, 0.70 MMBtu/hour, natural gas-fired – Hangar 6	None	2021
BOI-0108-01	Boiler, 1.01 MMBtu/hour, propane-fired – Admin Bldg	None	2023
BTH-2547-01	Paint booth	None	2005
BTH-2801-01	Paint booth	OAC 723a	2007
BTH-2547-04	Paint booth	OAC 422b	10/2011
BTH-0995-01	Paint booth	OAC 755a	2013
BTH-2699-01	Paint booth	None	Before 2016
BTH-2681-01	Paint booth – Hangar 9	None	Before 2016
BTH-0985-01	Paint booth – Ejection Seat	None	Unknown
RBL-2547-01	Blast booth	OAC 266	2005

Table 5-3 Equipment Permanently Shutdown at NAS Whidbey Island

Equipment ID	Description	Associated OAC†	Effective Date of Shutdown
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
EOD-2789-01	Popping Furnace – EOD ammunition disposal trailer	None	Between 2017 & 2023
WOO-2555-01	Wood chipper	OAC 586	7/2012
ICE-0385-01	Emergency generator	OAC 551	2013
ICE-2700-04	Emergency generator	OAC 551	2005
ICE-2700-03	Emergency generator	OAC 551	2007
ICE-2700-01	Emergency generator	OAC 551	2009
ICE-2700-02	Emergency generator	OAC 551	2009
ICE-0976-01	Emergency generator	OAC 551	2008
ICE-0384-02	Emergency generator	OAC 624	2014
ICE-0385-02	Emergency generator	OAC 624	2014
ICE-2544-01	Emergency Generator	None	2014
ICE-2707-01	Emergency generator	None	2017
ICE-0993-01	Emergency Generator	None	2018
ICE-0993-02	Emergency generator	OAC 551	2018
ICE-0894-02	Emergency Generator	None	2021
n/a	Soil Vapor Extraction	OAC 635	1999
STR-2547-01	Stripping tank	None	2018
STR-2547-02	Stripping tank	None	2018
DEG-2547-01	Degreasing tank	None	2018
n/a	FRCNW Alodine tank	None	2018
GAS-2595-01	UST Ault Field NEX	OAC 644a	2022
GAS-2595-02	UST Ault Field NEX	OAC 644a	2022
GAS-2595-03	UST Ault Field NEX	OAC 644a	2022
GAS-2622-01	UST Ault Field Gov Fleet	OAC 646	2023
GAS-2623-01	UST Ault Field Fleet	OAC 646	2023

† 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 NAS Whidbey Island.

6. INSIGNIFICANT EMISSION UNITS/ACTIVITIES

Categorically exempt insignificant emissions units (IEUs) listed in WAC 173-401-532 are present at NAS Whidbey Island. These categorically exempt emissions units normally have low emissions and are considered insignificant by regulation and are not required to be listed on the permit application. Specific emission units and activities are considered insignificant according to WAC 173-401-533 based on size or maximum rated capacity; these IEUs must be listed on the permit application. Other emission units or activities generate only fugitive emissions for which there are no specifically applicable requirements. These activities, categorized as insignificant in Chapter 173-401-530(1)(d) WAC, must also be listed on the permit application. All insignificant emission units (IEUs) are subject to AOP Section 4 – Generally Applicable Requirements.

IEUs and activities at NAS Whidbey Island identified in the permit application are listed in the following two tables. Table 7-1 includes all IEUs and activities except for heating equipment; heating equipment that qualify as IEUs are listed in Table 7-2. 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 NAS Whidbey Island 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
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.
AST-0016-01 SPB Fire Station	300-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0017-01 Naval Exchange	380-gal grease 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-0018-01 SPB Transportation Building	1,167-gal used oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-0027-01 SPB Fleet Aviation Spec. Op. Training	1,000-gal heating oil storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0124-01 OSC Vehicle Maintenance/HW Storage	550-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0135-01 Bldg. 2508 stand by generator for ASCOMM Bldg. 135 (EG Tank)	383-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0138-02	385-gal grease 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-0198-01 Water Pump Station	550-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0206-01 Janitorial Admin Bldg	110-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0206-02 Janitorial Admin Bldg	110-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0312-01 SPB Sewer Lift Station (EG Tank)	550-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal

FACILITY ID NO.	Description	IEU Basis
AST-0357-01 SPB Public Works Filling Station	2,000-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-0368-01 Runaway Vault A	300-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0368-02 Airfield (EG tank)	825-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0382-01 Main Galley (EG tank)	639-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0382-03 Main Galley	385-gal grease 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-0384-01 Central Heating Plant (CHP) (EG tank)	300-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0384-02 CHP Generator Day Tank	160-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0384-03 CHP Boiler Backup Fuel Storage Tank	10,000-gal 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.
AST-0384-04 CHP Boiler Backup Fuel Storage Tank	10,000-gal 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.

FACILITY ID NO.	Description	IEU Basis
AST-0385-01 Public Affairs/NAS Bldg (EG tank)	550-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0385-02 Public Affairs/NAS Bldg	57-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0386-01 Hangar 5 (EG Tank)	1,500-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0386-B3 Hangar 5	550-gal 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-0410-01 Hangar 6 (EG Tank)	100-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0410-02 Hangar 6	1,000-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0410-B1 Hangar 6	550-gal 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-0410-B2 Hangar 6	600-gal jet fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0420-01 Wastewater Treatment Plant Headworks "fly lift"	300-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0421-01 Ault Field Sewer Lift Station (EG Tank)	160-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0430-01 Weapons bunker	120-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal

FACILITY ID NO.	Description	IEU Basis
AST-0856-01 Taxiway Airfield G/Radar Bldg (EG Tank)	300-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0856-02 Taxiway Airfield	65-gal diesel storage tanks	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0858-01 Racon (EG Tank)	550-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0858-02 & 03 Racon	240-gal and 1,000-gal (respectively) diesel storage tanks	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0870-01 SPB Sewer Lift Station (EG Tank)	550-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0874-01 Radio Transmitter Bldg	300-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0874-02 Radio Transmitter Bldg (EG tank)	65-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0889-01 Vault B Taxiway (EG Tank)	300-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
"AST-0889-02 Vault B taxiway (Day Tank)"	240-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0892-01 SPB Fuels	2,000-gal jet fuel product recovery 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-0892-02 SPB Fuels	233-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal

FACILITY ID NO.	Description	IEU Basis
AST-0894-01 PAR site (radar) (EG Tank)	150-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0962-02 Officers' Mess	385-gal grease 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-0975-01 AF/Telephone Exchange (EG Tank)	75-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0976-01 Aircraft Systems Training	100-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0976-02 Aircraft Systems Training	650-gal Jet Fuel storage tank	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
AST-0976-03 Aircraft Systems Training	500-gal hydraulic 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-0994-01 Security (EG tank)	1,200-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-0995-01 Ground Support Equipment	550-gal aviation fuel storage tank	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C.
AST-0995-02 Ground Support Equipment	550-gal aviation fuel 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
AST-2510-02 Convergence Zone	385-gal grease 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-2510-03 Convergence Zone	385-gal grease 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-2525-03 Test Cell Fuel Storage	385-gal 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-2525-06 Test Cell Fuel Storage	2,000-gal Jet fuel storage tank	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
AST-2544-03 Hangar 7 (EG Tank)	275-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2544-B1 Hangar 7	550-gal 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-2544-B2 Hangar 7	600-gal 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-2547-01 Fleet Readiness Center	396-gal 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-gal quench oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2547-03 Fleet Readiness Center	75-gal quench oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2547-04 Fleet Readiness Center	5,090-gal CEE-BEE Tank, FRCNW Division 500	WAC 173-401-533(2)(x): Dip-coating operations, using materials with less than one percent VOCs.
AST-2547-05 Fleet Readiness Center	80-gal Alodine and 480-gal Alodine rinsate tank compartment for corrosion preventive coating, FRCNW Division 500	WAC 173-401-533(2)(y): Surface coating, aqueous solution or suspension containing less than one percent VOCs.
AST-2549-01 Auto Hobby Shop		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-2577-01 AF/Intersections of Runway	300-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal

FACILITY ID NO.	Description	IEU Basis
AST-2580-01 AF/Small Arms Training Center	300-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2581-01 Fenceline near Ault Field Flying Club (EG Tank)	60-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2929-05 Ault Field NEX Gas Station	180-gal 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 Radio tacan	550-gal diesel tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2596-02 Radio tacan	65-gal diesel tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2615-01 SPB WWTP	660-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2633-01 Golf Course (Bldg 2925)	500-gal gasoline storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, including gasoline storage tanks
AST-2633-02 Golf Course (Bldg 2925)	300-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2641-01 Security Training Building	500-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2642-01 Hangar 8 (EG Tank)	100-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal

FACILITY ID NO.	Description	IEU Basis
AST-2642-B1 Hangar 8	550-gal 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-2642-B2 Hangar 8	500-gal jet fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2642-B3 Hangar 8	1,000-gal 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-2642E-01 East of bldg. R-43 and 2641 (Bldg 995F)	2,000-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K ga
AST-2642E-02 East of bldg. R-43 and 2641 (Bldg 995F)	550-gal jet fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2644-01 Temp. fire station and recycle annex	500-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2645-02 Sewage Lift Station (EG Tank)	46-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2671-02 Near Bldg 2766	400-gal reclaimed 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-2673-01 Fuel Farm #3 oil/water separator	433-ga reclaimed fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal

FACILITY ID NO.	Description	IEU Basis
AST-2675-01 Fuel Farm #6 oil/water separator	400-gal reclaimed fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2676-01 Fuel Farm #8 oil/water separator	400-gal reclaimed fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2681-01 Hangar 9 (R-12)	100-ga diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2681-B1 Hangar 9	100-gal 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-2681-B2 Hangar 10	450-gal jet fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2699-01 Hangar 10	100-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2699-02 Hangar 10	1,000-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2700-04 & 05 NOPF Bldg	250-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2702-01 Govt Vehicle Fuel Facility	500-gal 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-2733-B1 Hangar 11	300-gal 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-2733-B2 Hangar 11	600-gal jet fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2737-B1 Hangar 12	550-gal 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-2737-B2 Hangar 12	300-gal 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-2737-B3 Hangar 12	400-gal 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.
AST-2742-01 SPB Commissary	260-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2742-02 SPB Commissary	385-gallon grease 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-2749-02 Ault Field NEX	385-gallon grease 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-2757-01 Bulk liquid storage yard, paint storage	10,000-gal diesel/jet fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal

FACILITY ID NO.	Description	IEU Basis
AST-2757-02 Bulk liquid storage yard, paint storage	15,000-ga 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-gal 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-gal 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-2757-08 Bulk liquid storage yard, paint storage	220-gal Polyalphaolefin Lubricants (PAO) 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-2757-09 Bulk liquid storage yard, paint storage	220-gal PAO 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-2757-10 Bulk liquid storage yard, paint storage	5,000-gal 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-2765-01 T-10 Jet Test Cell	120-gal engine preservative oil storage tank	WAC 173-401-532(4) Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.
AST-2766-01 T-10 Jet Test Cell	385-gal 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-2771-01 Tactical Support Center	4,200-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
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-2772-02 Tactical Support Center	unknown gallon diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2796-01 Sewage Treatment Plant (EG Tank)	150-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2801-01 GSE Shop	240-gal 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-2801-02 GSE Shop	240-gal 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-2815-01 Security Dog Kennel (EG Tank)	150-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2836-01 Support Facility (EG Tank)	150-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2853-01 Langley Gate (EG Tank)	84-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2864-01 Charles Porter (EG Tank)	84-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2873-01 Flight Line (New Tower) (EG Tank)	78-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2883-01 Saratoga Heights Near Tank 88	305-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2897-01 B2897 (EG Tank)	425-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2903-01 Indoor Aircraft Washrack (EG Tank)	150-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
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-gal each Jet Fuel 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	275-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2911-03 Refueler shop	350-gal Jet Fuel and water storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2911-04 Refueler shop	540-gal jet fuel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal

FACILITY ID NO.	Description	IEU Basis
AST-2911-05 Refueler Shop	494-gal jet fuel skid tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal, incl gasoline storage tanks
AST-2924-01 Golf Course	55-gal 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-2928-01 Consolidated Fueling Facility near Bldg 2911	438-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2929-01 Ault NEX Gas Station	77-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2929-02A Ault Field NEX Gas Station (split compartment tank)	4,000-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2929-04 Ault Field NEX Gas Station	6,000-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2965-01 Cliffside Park Lift Station (EG tank)	116-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-2987-01 P8 LOX Facility	205-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
AST-3001-01 Tactical Ops Center	4,200-gal diesel storage tank	WAC 173-401-533(2)(c): covered, low VOC, < 10K gal
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.

FACILITY ID NO.	Description	IEU Basis
BKG-SPB-01	JP 8 transfer to pipeline	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
BBL-0018-01	Glove box blasting (<0.75 tpy PM ₁₀)	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (e) 0.75 tons per year of PM ₁₀
BBL-0371-01	Glove box blasting (<0.75 tpy PM ₁₀)	WAC 173-401-530(4)(e) Insignificant emission thresholds. An emission unit or activity shall be considered insignificant if it qualifies under subsection (1)(b), (c) or (d) of this section, or if its actual emissions, based on methods approved by the permitting authority, are below the practical quantification limit (PQL), or are less than or equal to all of the following threshold levels: (e) 0.75 tons per year of PM ₁₀
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-0995-02	GMB02- Glass media blast-media blast (P/N25913 SN Z56271 -(AF-005C - 2-gals)	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 PM10) PMB01- plastic media blast- 4.5-gal CYCLONE MANUFACTURE FRCNW 600 Division, Room 146	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 PM10
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 PM10
BBL-2547-10	White Aluminum Oxide 120 Grit (PN 25913M SN PRJ10843-2), 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 PM10
BBL -2731-01	Glove box blasting (<0.75 tpy PM10)	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 PM10
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.

FACILITY ID NO.	Description	IEU Basis
BTH-0371-01	BOSC Shop – dry filter paint booth for aerosol can application (non-spray coating operation, not subject to NWCAA 508) to room signs, doors, vents, etc; av paint usage last 5 years <2 gal/yr	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	55-gal Parts Washer HYD components /Rods (S/N 33041845) Solvent: MIL-PRF-680, FRCNW 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	110-gal Bearing Parts Washer (Inland Technology P/N IT-80 SN 30241412) Solvent: MIL-PRF-680, FRCNW 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	110-gal Solvent Parts Washer (S/N SPW-0052/PN-PCS-10) Solvent: MIL-PRF-680, FRCNW 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-2547-08	15-gal Turbine Bearing Hot Bath Parts Washer (S/N 11550) Oil Tank heated to 197°F, Material: 1010 Oil (SDS CXVHZ), FRCNW 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)

FACILITY ID NO.	Description	IEU Basis
CLN-2547-09	30-gal Parts Washers (Gray Mill-O-ring S/N 237574-100, PN A-40455-A) Material: DARACLEAN 282, FRCNW 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-2547-12	80-gal 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-2547-13	30-gal Part Washer (Gray Mill)-O-ring (P/N A-40455-A, S/N 237574-101), FRCNW Division 500	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-2547-14	200-gal Aqueous Part Washer (Better Engineering MFG RD-6000 LX-PZX (SN:22643), 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-2547-15	70-gal Part Washer (Better Engineering S/N 21274 -CAGE OKRW1-MODEL# F-SM-3000-N - AF-480A) FRCNW Division 500, Room 1006A	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-2547-16	5-gal OT-Herkules Paint Gun Washer (P/N: 100270221G415 S/N: GAAA 66665), Solvent: EP-921, FRCNW Division 500, Paint Booth Room 1017	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-2547-17	5-gal OT-Herkules Paint Gun Washer (P/N: 100270221G415 S/N: GAAA 66664), Solvent: EP-921, FRCNW Division 500, Paint Booth Room 1017	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-2547-18	80-gal Solvent Part washer - (SPW-0053/PN-PCS-10) Solvent: MIL-PRF-680, FRCNW Division 700, Room 116	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-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)
DEG-0423-01	80-gal 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
DEG-2547-01	500-gal Engine/T56 Parts Washer, Solvent: MIL- PRF-680, FRCNW 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)
DEG-2547-03	80-gal Bearing Degreasing Parts Washer (Inland Technology IT-80 S/N 241413) Solvent: MIL-PRF-680, FRCNW 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)
DEG-2547-04	80-gal Engine External Parts (clamps) Degreasing Part Washer (S/N 1011853) Solvent: MIL-PRF-680, FRCNW 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)
DEG-2547-06	1,060-gal Degreaser tank, Solvent: Mil-PRF-680, FRCNW Division 500	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-2766-01	80-gal Engine External Parts (clamps) Degreasing Part Washer (S/N 81001280) Solvent: MIL-PRF-680, FRCNW 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
DEI-0386-01	Deicer (ethylene glycol) applied to aircraft, runways and paved areas at Hangar 5 - 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	Deicer (ethylene glycol) applied to aircraft, runways and paved areas at Hangar 6 - Fugitive emissions	WAC 173-401-530(1)(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.
DEI-0410-02	Deicer (ethylene glycol) applied to aircraft, runways and paved areas at Hangar 6 - 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	Deicer (ethylene glycol) applied to aircraft, runways and paved areas at Hangar 7 - 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	Deicer (ethylene glycol) applied to aircraft, runways and paved areas at Hangar 8 - 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	Deicer (ethylene glycol) applied to paved areas at MWR Warehouse - 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-2681-01	Deicer (ethylene glycol) applied to aircraft, runways and paved areas at Hangar 9 - 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	Deicer (ethylene glycol) applied to aircraft, runways and paved areas at Hangar 10 - 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-2733-01	Deicer (ethylene glycol) applied to aircraft, runways and paved areas at Hangar 11 - 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	Deicer (ethylene glycol) applied to aircraft, runways and paved areas at Hangar 12 - 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-2980-01	Deicer (ethylene glycol) applied to aircraft, runways and paved areas at Hangar 14 - 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-2990-01	Deicer (ethylene glycol) applied to aircraft, runways and paved areas at Hangar 15 - 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
EPL-0219-01	Brush/Selective Electroplating – Fugitive emissions	WAC 173-401-530(4)(p) 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: Thresholds levels for hazardous air pollutants as defined in WAC 173-401-531.
FIR-EODNW-01	Explosive Ordnance Disposal - 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-2790-01	Propane-fired mobile fire training device, custom - 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.
LAN-FILL-01	Ault Field Landfill (closed) - 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.
PAV-ROAD-01	Paved road driven by various vehicles on base - 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
PCB-0995-02	Powder Coating Booth (GZAA 045598), Ventilates through fabric filtration and exhausts inside building, FRCNW 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)
PDC-2801-01	Powder coating boot for ground support equipment (not spray coating operation subject to NWCAA 508) - 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.
SAN-2818-01	Sand blast booth at B2818, enclosed inside building - 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.
STP-LAND-01	Sewage Treatment Pond <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	Unpaved roadways, Ault Field- 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	Unpaved roadways, Seaplane Base - 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-gal 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-gal Jet Fuel storage tank	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
UST-0386-02 Hangar 5	550-gal 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-0410-01 Hangar 6	550-gal 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-0410-02 Hangar 6	550-gal 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-0423-02 Ordnance Operations Building	2,500-gal 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-0423-03 Ordnance Operations Building	2,500-gal 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-0993-01 Hospital and Dental Clinic	6,000-gal 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-gal 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-2544-01 Hangar 7	550-gal 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-2544-02 Hangar 7	550-gal 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-2700-01 NOPF building	57-gal 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-2700-02 NOPF building	57-gal 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-gal Jet Fuel 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-2872-01 & -02 Middle of taxiways C, E and J	30,000-gal each Jet fuel storage tanks	WAC 173-401-533(2)(t) storage of high boiling point material, initial bp not less than 150°C
UST-2910-04 Fuel facility	2,500-gal 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.
UVC-2801-01	Ultraviolet curing process	WAC 173-401-532(36) Ultraviolet curing processes.
WLD-0018-01	Welding 650 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-0371-01	Welding 30 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-0371-02	Welding <1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-0385-01	Welding <1.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-0385-02	Welding 4.0 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-0976-01	Welding 35 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.
WLD-2547-01	Welding 1664 lb/yr	WAC 173-401-533(2)(i) The following units and activities are determined to be insignificant based on their size or production rate: Welding using not more than one ton per day of welding rod.

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

FACILITY ID NO.	Description	IEU Basis
WWT-SPB-01	Wastewater Treatment fugitive emissions	WAC-173-401-533 (Units and activities defined as insignificant on the basis of size or production rate): (3) The following units or activities may be determined to be insignificant on a case-by-case basis by the permitting authority: (d) NPDES permitted ponds and lagoons utilized solely for the purpose of settling suspended solids and skimming of oil and grease.

Table 6-2 INSIGNIFICANT EMISSION UNITS & ACTIVITIES - HEATING EQUIPMENT

Unit ID	Location	MMBtu / hour	Fuel	Basis for IEU	Install Year
Ault Field					
BOI-0386-01	Hangar 5	1.5	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2008
BOI-0386-02	Hangar 5	1.5	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2008
BOI-0410-03	Hangar 6	0.8	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2022
BOI-0410-04	Hangar 6	0.8	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2022
BOI-0420-01	Water Office	0.23	Propane	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	1998 / 1999
BOI-0423-01	Weapons	0.60	ULSD	WAC 173-401-533 (2)(g) Combustion source of less than one million Btu/hr if using kerosene, No. 1 or No. 2 fuel oil	1990
BOI-0960-01	Chapel	0.6	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2018
BOI-0962-01	Officers' Mess	0.40	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2018
BOI-0962-02	Officers' Mess	0.40	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2018
BOI-2544-01	Hangar 7	0.65	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2005 / 2008

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Unit ID	Location	MMBtu / hour	Fuel	Basis for IEU	Install Year
BOI-2544-02	Hangar 7	0.65	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2005 / 2008
BOI-2556-01	Fleet & Family Info Center	0.004	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2018
BOI-2556-02	Fleet and Family Info Center	0.004	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2018
BOI-2593-01	Flight Simulator	0.75	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2015
BOI-2593-02	Flight Simulator	0.75	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2015
BOI-2595-01	NEX Gas Station	0.102	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2018
BOI-2641-02	PSD	0.63	ULSD	WAC 173-401-533 (2)(g) Combustion source of less than one million Btu/hr if using kerosene, No. 1 or No. 2 fuel oil	2010
BOI-2644-01	NMCI	0.13	ULSD	WAC 173-401-533 (2)(g) Combustion source of less than one million Btu/hr if using kerosene, No. 1 or No. 2 fuel oil	2009
BOI-2734-01	Passenger Terminal	0.65	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2006 / 2008
BOI-2758-02	Aviation Physiology	0.40	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2015
BOI-2836-01	P-3 Support	0.25	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2002 / 2003
BOI-2836-03	P-3 Support	0.26	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2014
BOI-2837-03	Survival Pool	0.50	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2020
BOI-2837-04	Survival Pool	0.50	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2020

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Unit ID	Location	MMBtu / hour	Fuel	Basis for IEU	Install Year
BOI-2837-05	Survival Pool	0.50	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2020
BOI-2897-01	Firehouse	0.21	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2007
BOI-2897-02	Firehouse	0.21	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2007
BOI-2903-01	P-3 Wash Rack	0.90	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2008 / 2010
BOI-2903-02	P-3 Wash Rack	0.90	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2008 / 2010
BOI-2903-03	P-3 Wash Rack	0.90	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2008 / 2010
BOI-2903-04	P-3 Wash Rack	0.90	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2008 / 2010
BOI-2938-01	Child Dev. Center	0.33	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2010
BOI-2970-01	Flight Simulator	0.15	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2015
BOI-2980-01	Hangar 14	0.50	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2017
BOI-2980-02	Hangar 14	0.5	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2017
BOI-2986-01	P&A Sonobuoy Storage	0.08	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2018
BOI-2988-01	P&A Support Equipment Shop	0.97	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2017
BOI-2990-01	Hangar 15	0.40	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2020

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Unit ID	Location	MMBtu / hour	Fuel	Basis for IEU	Install Year
BOI-2990-02	Hangar 15	0.40	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2020
BOI-3000-01	Triton Mission Control Facility	0.20	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2020
BOI-3000-02	Triton Mission Control Facility	0.20	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2020
BOI-3001-01	Tactical Operations Ctr	1.00	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2016
BOI-3001-02	Tactical Operations Ctr	1.00	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2016
FRN-0081-01 to -04	Env. Storage	<1.25 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-0130-01	Golf Clubhouse	0.11 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2022
FRN-0138-01	CPO Club/ Bakerview Restaurant	0.125 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-0138-02	CPO Club/ Bakerview Restaurant	0.11 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-0138-03	CPO Club/ Bakerview Restaurant	0.199 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-0138-04	CPO Club/ Bakerview Restaurant	0.12 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-0138-05	CPO Club/ Bakerview Restaurant	0.12 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-0138-06	CPO Club/ Bakerview Restaurant	0.1 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-0R12-01	Shop space	0.106 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown

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Unit ID	Location	MMBtu / hour	Fuel	Basis for IEU	Install Year
FRN-2580-01	Small Arms Range Ops	0.08 Space heating	ULSD	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2733-01	Hangar 11	0.3 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2022
FRN-2733-02	Hangar 11	0.5 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2022
FRN-2734-01	Air Passenger Terminal	0.30 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2735-01	Medical Admin Whidbey Island	0.04 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2737-01	Hangar 12	0.64 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-2737-02	Hangar 12	0.3 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-2749-01	Ault Field NEX	0.04 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2749-02	Ault Field NEX	0.04 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2789-01	EODNW Ops Bldg	0.122 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2795-01	EODNW Boat Shop	0.3 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2813-01	NEX Gas Station	0.072 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2813-02	NEX Gas Station	0.072 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2813-03	NEX Gas Station	0.060 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown

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Unit ID	Location	MMBtu / hour	Fuel	Basis for IEU	Install Year
IRH-0410-17 to 20	Hangar 6	0.80 Total	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2015
IRH-2544-01	Hangar 7	1.80	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
IRH-2544-02	Hangar 7	1.80	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
IRH-2544-03	Hangar 7	1.80	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
IRH-2544-04	Hangar 7	1.80	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
IRH-2681-01 to 04	Hangar 9	1.20 Total	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
IRH-2699-03 to -06	Hangar 10	0.60 Total	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
IRH-2733-01 and 02	Hangar 11	1.12 Total	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
IRH-2737-01 to 05	Hangar 12	1.25 total	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
IRH-2749-01 to 03	AF NEX	< 5 Total	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
IRH-2762-01 to 03	Self Help Warehouse	< 5 Total	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
IRH-2884-01 to -02	Hazardous / Flammable Warehouse	0.155	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
IRH-2903-01 to -03	Indoor Aircraft Wash Rack	2.6 Total	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
IRH-2988-01 to -04	P&A Support Equipment Shop	< 5 Total	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021

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Unit ID	Location	MMBtu / hour	Fuel	Basis for IEU	Install Year
IRH-GRH-01 to -03	Fire & Crash B2897	0.3 Total	NG - Infrared heater	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
WHT-2733-01	Hangar 11	0.05	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
WHT-2737-01	Hangar 12	0.05	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
Seaplane Base (SPB)					
BOI-2826-01	SPB Lodge	0.40	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG	2001 / 2002
BOI-2826-02	SPB Lodge	1.00	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG	2002
BOI-2938-01	SPB Child Develop. Ctr	0.33	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane and/or LPG	2010
FRN-0016-02	SPB Fire Station	0.90 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-0017-01 to-09	SPB Naval Exchange (NEX)	0.64 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-0017-10 to-11	SPB NEX	0.082 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-0033-01	SPB Admin/ Ops Bldg	0.3 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2021
FRN-0034-01	SPB Command Armory	0.3 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	2022
FRN-2742-01 to-05	SPB Commissary	0.05 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2742-06 to-10	SPB Commissary	0.15 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown

Unit ID	Location	MMBtu / hour	Fuel	Basis for IEU	Install Year
FRN-2742-11 to-12	SPB Commissary	0.074 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2874-01	SPB Youth Center	0.4 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2874-02	SPB Youth Center	0.25 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
FRN-2874-03	SPB Youth Center	0.1 Space heating	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
WHT-2874-01	SPB Youth Center	0.1	Natural Gas	WAC 173-401-533 (2)(e) Combustion source less than five million Btu/hr, exclusively using natural gas, butane, propane &/or LPG	Unknown
Portable					

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". The permit now generally refers to Jet fuel.

"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	horsepower (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 4

8.1. Public Comment Period on Draft Permit

The NWCAA issued draft air operating permit 008R4 (AOP Renewal 4) on November 22, 2023. A 30-day public comment period on the draft permit ran for at least 30 days, ending on December 22, 2023. Notice was posted in the Washington Department of Ecology's Permit Register, and on NWCAA's website.

Copies of draft AOP renewal 4 (NAS Whidbey Island AOP #008R4) 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

No comments were received by NWCAA on the draft AOP.

8.2. EPA Review on Proposed Permit

Following the close of the public comment period, a proposed permit (updated to reflect "proposed" with the proposed date, instead of "draft" with the draft date) and statement of basis was sent to EPA Region 10 on December 27, 2023. EPA's mandatory 45-day review period will close on February 12, 2024. NWCAA requested and received expedited review of NAS Whidbey Island's permit from EPA on January 3, 2024.