

Facility Name: **Marine Corps Logistics Base**  
 City: Albany  
 County: Dougherty  
 AIRS #: 04-13-095-00023

Application #: TV-680669  
 Date Application Received: July 22, 2022  
 Permit No: 9711-095-0023-V-05-0

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## **Introduction**

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Facility Identification**

## 1. Facility Name:

Marine Corps Logistics Base

## 2. Parent/Holding Company Name

U.S. Department of the Navy

## 3. Previous and/or Other Name(s)

None

## 4. Facility Location

Fleming Road  
Albany, Georgia 31704

## 5. Attainment, Non-attainment Area Location, or Contributing Area

The facility location is designated as an attainment area for all criteria pollutants.

**B. Site Determination**

There are no other facilities which could possibly be contiguous or adjacent and under common control.

**C. Existing Permits**

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
9711-095-0023-V-04-0	01/12/2018	3 <sup>rd</sup> Title V permit renewal
Off-Permit-Change	07/03/2018	Use of a new blasting media in Blasting Booths AB01, AB02, AB03, AB07, AB08 and AB15.

## D. Process Description

### 1. SIC Codes(s)

9711: National Security

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

### 2. Description of Product(s)

The facility does not produce any product.

### 3. Overall Facility Process Description

The Marine Corps Logistics Base (MCLB) – Albany is not a production (manufacturing) facility. MCLB provides logistical and maintenance support for U.S. Marine Corps activities. The primary functions of this facility are to warehouse and distribute materials and to repair and rebuild amphibious tanks, jeeps, trucks, radar units, communication equipment, and other vehicles used in marine combat operations.

Air emissions sources at MCLB -Albany include boilers, backup diesel generators, organic liquid storage tanks, vehicle fueling stations, spray painting facilities, paint stripping and cleaning facilities, solvent degreasing equipment, abrasive blasting facilities, and woodworking facilities.

### 4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

## E. Regulatory Status

### 1. PSD/NSR

The facility is non-major source under PSD/NSR regulations because of the facility-based-wide annual VOC emission limits in section 3.2 of Title V permit No. 9711-095-0023-V-05-0. The VOC emissions limits allow the facility/base to avoid being subject to 40 CFR 52.21, *Prevention of Significant Deterioration (PSD)* under New Source Review (NSR) rules.

2. Title V Major Source Status by Pollutant

**Table 2: Title V Major Source Status**

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility’s Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM <sub>10</sub>	✓			✓
PM <sub>2.5</sub>	✓			✓
SO <sub>2</sub>	✓		✓	
VOC	✓	✓		
NO <sub>x</sub>	✓	✓		
CO	✓	✓		
TRS	✓			✓
H <sub>2</sub> S	✓			✓
Individual HAP	✓		✓	
Total HAPs	✓		✓	

3. MACT Standards

This facility/base is a synthetic minor/area source for HAPs and is, therefore, subject to 40 CFR Part 63, Subpart P, *National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Stands*. However, due to the “Once In Always In” provision in the Clean Air Act, this facility/base will remain subject to 40 CFR Part 63, Subpart II, NESHAP for Shipbuilding and Ship Repair. The facility has adopted a 40 CFR Part 63, Subpart II avoidance limit of 264 gallons of marine coatings usage per year in shipbuilding coating operations. By the virtue of being an area source of HAPs, the base has diesel engines/generators which are subject 40 CFR Part 63, Subpart Z, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. In addition, per 40 CFR 63.11169(d)(1), its paint spray booths are exempt from 40 CFR Part 63, Subpart H, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*. Furthermore, per 40 CFR 63.11505(d)(4), the “plating, polishing, coating, or thermal spraying conducted to repair surfaces or equipment” at this facility is not subject to 40 CFR Part 63, Subpart W, *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations*.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes

Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

## Regulatory Analysis

### II. Facility Wide Requirements

#### A. Emission and Operating Caps:

To maintain minor/area source status for HAPs emissions under the MACT standards, a base-wide emissions cap limits any single HAP to less than 10 tons and total HAPs combined from the entire facility/base to less than 25 tons during any twelve consecutive months.

A base-wide NO<sub>x</sub> emission limit of 40 ton-per-year (TPY) from the combustion of natural gas in the base was adopted in the current permit. The limit allowed a previous modification to the base to avoid a PSD/NSR review.

#### B. Applicable Rules and Regulations

Applicable facility-wide air quality rules include the general requirements of 40 CFR 60, New Source Performance Standards (NSPS), 40 CFR 63, National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A, and the general provisions contained in Georgia Rule 391-3-1-.02(2)(a) which are cited, chiefly, in Section VIII of the permit and the general provisions contained in Rule 391-3-1-.02(2)(a).

#### C. Compliance Status

Title V renewal Application No. TV-680669 does not indicate that the facility is operating out of compliance with the rules and regulations.

#### D. Permit Conditions

Conditions 2.1.1, 2.1.2, 2.2.1 and 2.2.2 were all carried over from the current permit No. 9711-095-0023-V-04-0. Condition 2.1.1 allows the whole facility to remain as a synthetic minor source/area source under 40 CFR Part 63. Condition 2.2.1 allowed a previous modification to the base to avoid a PSD/NSR review. Both Conditions 2.2.1 and 2.2.2 subject the facility to the applicable general requirements under 40 CFR 60 Subpart A, *General Provisions* and 40 CFR 63 Subpart A, *General Provisions*.

### III. Regulated Equipment Requirements

#### A. Equipment List for the Process

Equipment List/Emission Unit (Subsection 3.1) was updated based on the application No. TV-680669. Milspray Surface Coating Facility (Portable) (Emission Unit ID No. SC29), Portable Plastic Media Blasting Room (Emission Unit ID No. AB16) and Pyrolysis Reactor System (Emission Unit ID No. PRS1) were all removed from Subsection 3.1 of the draft permit according to the application No. TV-680669. Sponge-Jet Blasting Operations in Bldg. 2236 (Emission Unit ID No. AB15) was renamed as Abrasive Blasting Booth Using Garnet Stone in Bldg. 2236. The Permittee indicated that this facility was no longer using propane as fuel. Therefore, all references to and conditions for propane were eliminated.

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
EC12	Kewanee Hot Water Boiler, 16.7 MMBtu/hr., installed in 1997	40 CFR 60 Subparts Dc 391-3-1-.02(2)(d)	None	None
SB01	Steam Boiler 1 Manufacturer: English Boiler and Tube 30 MM Btu/hr. Located at Building 2210 Installed in 2010	40 CFR 60 Subparts Dc 391-3-1-.02(2)(d)	None	None
SB02	Steam Boiler 2 Manufacturer: English Boiler and Tube 30 MM Btu/hr. Located at Building 2210 Installed in 2010	40 CFR 60 Subparts Dc 391-3-1-.02(2)(d)	None	None
SB03	Steam Boiler 3 Manufacturer: English Boiler and Tube 30 MM Btu/hr. Located at Building 2210 Installed in 2010	40 CFR 60 Subparts Dc 391-3-1-.02(2)(d)	None	None
SB04	Steam Boiler 4 Manufacturer: Johnston (509 Series) 6 MMBtu/hr. Located at Bldg. 2299 Installed in 2010	391-3-1-.02(2)(d)	None	None
SB05	Steam Boiler 5 Manufacturer: Johnston (509 Series) 6 MMBtu/hr. Located at Bldg. 2299 Installed in 2010	391-3-1-.02(2)(d)	None	None
GEN1	Cogeneration Unit GE Jenbacher Engine Generator 2009 Model Year Input: 16,938 MMBtu/hr Output: 1,916 kW Installed in 2010	40 CFR 60 Subpart JJJJ 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b)1	None	None

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
GEN2	Cogeneration Unit GE Jenbacher Engine Generator 2013 Model Year Input: 16,938 MMBtu/hr Output: 2,246 kW Installed in 2013	40 CFR 60 Subpart JJJJ 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b)1	None	None
IC50	Peak Shaving Generator Caterpillar 3512C Output: 1,230 kW Installed in February 2010	40 CFR 60 Subpart IIII 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b)1	None	None
ET01	Engine Testing Facility/Cell (Formerly Known as Dynamometer/ Ground Hop Group DYG1)	391-3-1-.02(2)(e)	None	None
DO01	Curing Oven No. 1 16 MMBtu/hr. Installed in 2005	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
DO02	Curing Oven No. 2 16 MMBtu/hr. Installed in 2005	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
DO03	Curing Oven No. 3 16 MMBtu/hr. Installed in 2005	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
SC08	Open Touch-up Painting Area Located Outside Building 2211	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
SC09	Paint Spray Booth 50' x 20' x 25' Bldg. 2222	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	S9F	Dry Filters
SC10	Paint Spray Booth 50' x 20' x 25' – Bldg. 2222	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	S10F	Dry Filter
SC14	Surface Coating Fugitive Emissions/Open Surface Activities Using Sealants, Adhesives & Lubricants	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	N/A
SC17	Spray Paint Booth – Bldg. 2233	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	S17F	Dry Filters
SC18	Spray Paint Booth – Bldg. 2233	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	S18F	Dry Filters
SC19	Paint Spray Booth Radiator Shop Paint Booth - Bldg. 2200	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	S19F	Dry Filters
SC20	Surface Coating Fugitive Emissions (Touch-up Painting)/ Open Surface Coating Activities	391-3-1-.02(2)(n)	N/A	N/A
SC23	Paint Spray Booth – Bldg. 2257	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SF23	Dry Filter
SC24	Paint Spray Booth – Bldg. 2257	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SF24	Dry Filter
SC26	Camouflage Paint Spray Booth – Bldg. 2211	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SF26	Dry Filter
SC30	Paint Spray Booth (At the Hobby Shop)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
SC33	Spray Paint Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SF33	Dry Filters
SU13	Solvent Fugitive Emissions /Facility-wide Solvent Use Activities	391-3-1-.02(2)(n)	N/A	N/A
AB01	Abrasive Blasting Booth using Garnet stone in Bldg. 2236	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH01	Baghouse
AB02	Abrasive Blasting Booth using Garnet stone in Bldg. 2236	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH02	Baghouse

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
AB03	Abrasive Blasting Booth using Garnet Stone in Bldg. 2236	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH03	Baghouse
AB07	Abrasive Blasting Booth using Garnet stone in Bldg. 2200	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH07	Baghouse
AB08	Abrasive Blasting Booth using Garnet stone in Bldg. 2200	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH08	Baghouse
AB015	Abrasive Blasting Booth Using Garnet Stone in Bldg. 2236	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH15	Baghouse

## B. Equipment & Rule Applicability

40 CFR Part 60, Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h). Boilers SB01, SB02 and SB3 are subject to all applicable requirements of NSPS Subparts A and Dc. Since all the boilers burn natural gas only, they are not subject to any emission limits of NSPS Subpart Dc except the monthly fuel consumption recordkeeping requirement specified in 40 CFR 60.48c(g)(2). The facility is also required to operate natural gas consumption meters in order to provide fuel consumption for the boilers. In addition, all the boilers at this facility, including boilers too small to be subject to NSPS Subpart Dc, are subject to the PM and opacity limits specified in Georgia Rules (d) and (g). Since these boilers fire natural gas only, compliance with the PM and opacity limits in Georgia Rule (d) and the fuel sulfur content limit in Georgia Rule (g) are assured.

Natural gas or landfill gas-fired Cogeneration Units/Generators GEN1 and GEN2 are subject to 40 CFR Part 60, Subpart JJJJ - *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*. The diesel-fired Peak Shaving Generator IC50 is subject to 40 CFR Part 60, Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*. In addition, they are subject to 40 CFR Part 63, Subpart ZZZZ - *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. However, these generators/engines shall comply with 40 CFR Part 63, Subpart ZZZZ by complying with the applicable requirements under 40 CFR Part 60, Subpart JJJJ and 40 CFR Part 60, Subpart IIII. The applicable emission requirements for these generator/engines under both NSPS standards depend on the model year, capacity, and combustion mechanism (spark ignition or compression ignition).

Except boilers, all the PM emission sources including generators/engines are subject to the visible emission limit (40% opacity) specified in Georgia Rule (b), "*Visible Emissions*", and the applicable PM emission rate limits under Rule (e), "*Particulate Emissions from Manufacturing Facilities*".

All the boilers and fuel burning sources including natural gas or landfill gas-fired cogeneration units/generators and diesel-fired generator are subject to Georgia Rule (g), "*Sulfur Dioxide*".

### C. Permit Conditions

Carried over from the current permit No. 9711-095-0023-V-04-0, Condition 3.2.1 limits the VOC emissions from coating and solvent cleaning operations identified in Emission Unit Group SCG1 to less than 175 tons during any twelve consecutive month period. This limit ensures the facility/base-wide VOC emissions be less than 250 tons per year and therefore, makes this facility/base a PSD minor source, and that all modifications up to this point were minor for under pertinent PSD/NSR rules.

Condition 3.2.2 was carried from the current permit. This condition limits the Emission Unit Group ET01 and the Peak Shaving Generator IC50 to firing only distillate (No. 1 or No.2) fuel oil with ultra-low sulfur content.

Condition 3.2.3 was carried from the current permit. This condition specifies that Emission Unit Groups BG02 (which includes Boilers EC12, SB02, and SB03) and COG1, and any fuel burning sources (except generators) that are included in Attachment B of the Title V Permit, be restricted to burn natural gas only.

Carried over from the current permit, Condition 3.2.4 specifies that the Cogeneration Unit GEN1 and the Boilers SB04 and SB05 are allowed to burn only landfill gas and natural gas. This condition also allows both boilers to avoid being subject to 40 CFR Part 63, Subpart JJJJJ - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*.

Conditions 3.2.5, 3.2.6 and 3.2.7 were all carried from the current permit. These conditions contain various operational and emission limits which allow this facility to avoid NSR/PSD permitting in the past.

Conditions 3.2.8 and 3.2.9 were eliminated because the pyrolysis reactor system PRS1 was eliminated according to the application No. TV-680669.

For clarity, current Condition 3.3.1 was revised to specify the effected facilities/boilers subject to NSPS Subpart Dc.

For clarity, current Condition 3.3.2 was revised to specify that currently the Peak Shaving Generator IC50 is subject to NSPS 40 CFR Part 60, Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*.

Condition 3.3.3 was carried over from the current permit. It contains emission rate limits under 40 CFR Part 60, Subpart IIII which are applicable to the Peak Shaving Generator IC50.

Condition 3.3.4 was carried over from the current permit. This condition establishes applicable emission limits for the Peak Shaving Generator IC50 under NSPS Subpart IIII.

According to available manufacturer data, the Peak Shaving Generator IC50, i.e., the 1,230 kW Caterpillar 3512C diesel generator is a 12-cylinder diesel engine/generator combo with total cylinder displacement of 3,574 cubic inches, or approximately 58.57 liters. Each cylinder's

replacement/volume is approximately 4.88 liters. Therefore, Condition 3.3.5 was revised to establish the applicable fuel standards under NSPS Subpart IIII.

Condition 3.3.6 was carried over from the current permit. This condition contains applicable operating requirements under NSPS Subpart IIII for the Peak Shaving Generator IC50.

For clarity, current Condition 3.3.7 was revised to specify that currently the Cogeneration Units GEN1 and GEN2 are subject to NSPS 40 CFR Part 60, Subpart JJJJ - *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*

Condition 3.3.8 was carried over from the current permit. It contains emission rate limits under 40 CFR Part 60, Subpart JJJJ which are applicable to the Cogeneration Units GEN1 and GEN2.

Condition 3.3.9 was carried over from the current permit. It contains applicable operating requirements for minimizing emissions under 40 CFR Part 60, Subpart JJJJ.

For clarity, current Condition 3.3.10 was revised to specify that currently the Cogeneration Units GEN1, GEN2 and the Peak Shaving Generator IC50 are subject to CFR Part 63, Subpart ZZZZ, and shall comply with 40 CFR Part 63, Subpart ZZZZ by complying with all applicable emission standards/requirements under 40 CFR Part 60, Subpart JJJJ or Subpart IIII.

Condition 3.3.11 was carried over from the current permit. The coating usage limit in this condition allows the facility/base to avoid being subject to 40 CFR 63 Subpart II - *National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)*.

Conditions 3.4.1 and 3.4.2 were carried over from the current permit. These conditions establish applicable emission limits for visible and PM emissions from manufacturing processes under Georgia Rules (b) and (e). The facility is using various PM emission control devices including baghouses to comply with the applicable visible and PM emission limits in these rules.

Condition 3.4.3 was carried from the current permit. This condition establishes PM and visible emission limits for fuel burning equipment, i.e., boilers, under Georgia Rule (d). Burning natural gas and landfill gas only, various boilers at this facility/base are expected to comply with the applicable PM and visible emissions under this rule.

Carried from the current permit, Conditions 3.4.4 and 3.4.5 establish operating requirements for controlling PM emissions from abrasive blasting and paint coating processes.

Conditions 3.5.1, 3.5.2 and 3.5.3 were all carried over from the current permit. These conditions ensure the proper function of PM control devices being used by the facility/base, and the compliance with the applicable PM and visible emission limits.

#### **IV. Testing Requirements (with Associated Record Keeping and Reporting)**

##### **A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

##### **B. Specific Testing Requirements**

Conditions 4.2.1, 4.2.2 and 4.2.3 were all carried over from the current permit. Condition 4.2.1 contains the repeat performance testing requirements specified in 40 CFR 60.4243(b)(2)(ii). The initial performance test has already been completed and the relevant condition has not been included in the permit.

40 CFR 60.4244(a) through (g) specify the test methods and other procedures that the engine owner/operator must use when conducting the performance testing required by Conditions 4.2. The testing specifications and requirements are included in Conditions 4.2.2 and 4.2.3.

## V. Monitoring Requirements

### A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

### B. Specific Monitoring Requirements

Condition 5.2.1 was carried over from the current permit. This condition contains monitoring/recordkeeping requirements for operating time of the Peak Shaving Generator IC50 and for fuel used by the Cogeneration Units GEN1 and GEN2, the Boilers SB01, SB02, SB03, SB04 and SB05, and the Emission Unit Group ET01.

Conditions 5.2.2 and 5.2.3 were carried over from the current permit, except Dry Filter S1F and SF29, and Paint Spray Booth SC01 which were no longer listed by the application TV-680669. The monitoring, inspection, and recordkeeping requirements in both conditions ensure the proper function of PM control devices being used by the facility/base, and the compliance with the applicable PM and visible emission limits.

Condition 5.2.4 in the current permit was eliminated because the pyrolysis reactor system with ID No. PRS1 was no longer in service.

### C. Compliance Assurance Monitoring (CAM)

Not Applicable

## **VI. Record Keeping and Reporting Requirements**

### **A. General Record Keeping and Reporting Requirements**

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a [quarterly or semiannual] basis.

Current Condition 6.1.7 was updated by removing emission or emission control units no longer listed by the application No. TV-680669. These removed emission or emission control units are Pyrolysis Reactor System PRS1, Exhaust/Overspray Dry Filter Systems S1F and SF29, and Baghouse BH16.

### **B. Specific Record Keeping and Reporting Requirements**

All conditions in this subsection were carried over from the current permit except references to emission or emission control units no longer listed in the application No. TV-680699. Nevertheless, Condition 6.2.23 in the current permit was eliminated because the Permittee fulfilled its requirements. Conditions 6.2.24, 6.2.25 and 6.2.26 in the current permit were also eliminated because the Pyrolysis Reactor System PRS1 was no longer listed as an emission unit by the application No. TV-680669.

Condition 6.2.1 requires compliance with all applicable recordkeeping and reporting requirements of the shipbuilding or ship repair MACT standards in order to demonstrate the exempt status of the facility/base.

Conditions 6.2.2 thru 6.2.5 were carried from the current permit. These conditions establish the recordkeeping and compliance demonstration requirements for VOC emissions from Emission Group SCG1 and Paint Spray Booth SC30. These conditions ensure the relevant emission sources to comply with their emission limits in the permit.

Condition 6.2.6 requires the Permittee to maintain a log of any failure to operate any pollution control equipment specified at any time that the associated paint spray booth is in operation. Such a failure shall be reported as specified in Condition 6.1.7.

Condition 6.2.7 requires the Permittee to maintain a log of any failure to operate any listed baghouses at any time that the abrasive blasting equipment is in operation. Such a failure shall be reported as specified in Condition 6.1.7.

Condition 6.2.8 requires the Permittee to maintain monthly records of base-wide natural gas usage.

Condition 6.2.9 requires the Permittee to verify that each shipment of fuel oil received at the facility for use in the equipment group ET01 complies with specification in Condition 3.2.2.

Condition 6.2.10 requires the Permittee to calculate the total volume of natural and propane burned combined in each of the Boilers EC12, SB02 and SB03 and in the Cogeneration Unit GEN1 and GEN2 each month.

Condition 6.2.11 requires the Permittee to calculate the net operating hours of the Peak Shaving Generator IC50 each month from the cumulative hours of operation each month and the consecutive twelve-month total hours of operation for each month in a reporting period.

Condition 6.2.12 requires the Permittee to calculate the total volume of landfill gas burned combined each month in the Cogeneration Units GN1 and GN2 and in the boilers SB04 and SB05.

Condition 6.2.13 requires the Permittee to calculate the total volume of fuel oil burned in the emission unit group ET01 each month and the total volume of fuel oil burned by this source for the last twelve consecutive months each calendar month.

Since the based is no longer using propane as fuel, Condition 6.2.14 in the current permit was eliminated and all references to propane in the permit were eliminated as requested by the Permittee except Condition 8.27.2, which is a template condition.

The condition numbers of the current permit conditions after the deleted Condition 6.2.14 all advanced by one accordingly.

Conditions 6.2.14 and 6.2.15 require the Permittee to calculate monthly facility/base-wide total NO<sub>x</sub> emissions and twelve-month rolling total of NO<sub>x</sub> emissions from natural and propane combustion for each month.

Condition 6.2.16 requires the Permittee to report twelve consecutive month totals of following items for each calendar month in the reporting period:

- Total NO<sub>x</sub> emissions from natural gas combustion determined per Condition 6.2.15;
- Total volume of fuel oil burned in emission unit group ET01 determined per Condition 6.2.13b;
- Total hours of operation of the peak shaving generator IC50 determined per Condition 6.2.11c;
- Total marine coatings usage in shipbuilding coating operations determined per Condition 6.2.1.c;
- Total VOC emissions from emission unit group SCG1 determined per Condition 6.2.5.a; and
- Total VOC emissions from Paint Spray Booth SC30 determined per Condition 6.2.5.b.

Condition 6.2.17 requires the Permittee to maintain monthly facility wide usage records of all materials containing HAPs compounds and the HAP content of these compounds. HAPs emission

rates shall be calculated from these records to demonstrate compliance of the HAPs emission limit in Condition 2.1.1. These records shall be retained for at least five years.

Condition 6.2.18 requires the Permittee to calculate the facility wide total emissions of each HAP and all HAPs combined for each calendar month. Individual and total HAP emissions are calculated for the emissions unit groups SCG1, COG1, Paint Spray Booth SC30; Cogeneration Unit GEN1, boilers and heaters from combustion of natural gas, propane, and landfill gas and from dryer of the Pyrolysis Reactor System.

Condition 6.2.19 requires calculation of individual and total HAP emissions for the entire facility for every twelve consecutive months in a reporting period. This condition also requires notification to the Division if any of the consecutive twelve-month rolling totals for individual or total HAPs exceeds 10 tpy or 25 tpy respectively by the 15th day of the month following the exceedance.

Condition 6.2.20 contains the applicable fuel recordkeeping for the Peak Shaving Generator IC50 and other emergency generators under NSPS 40 CFR 60 Subpart III.

Condition 6.2.21 contains the applicable recordkeeping and reporting requirements for the Cogeneration Unit GEN1 and GN2 under 40 CFR 60 Subpart JJJJ.

Current Condition 6.2.23 was eliminated since the Permittee fulfilled the notification requirements contained in the condition.

Because the pyrolysis reactor system with ID No. PRS1 was no longer in service, current Conditions 6.2.24, 6.2.25 and 6.2.26 were all eliminated.

**VII. Specific Requirements**

## A. Operational Flexibility

None.

## B. Alternative Requirements

None.

## C. Insignificant Activities

See Permit Application on GEOS website.  
See Attachment B of the permit.

## D. Temporary Sources

None.

## E. Short-Term Activities

None.

## F. Compliance Schedule/Progress Reports

None.

## G. Emissions Trading

None.

## H. Acid Rain Requirements

Not applicable.

## I. Stratospheric Ozone Protection Requirements

Not applicable.

## J. Pollution Prevention

Not applicable.

## K. Specific Conditions

None.

**VIII. General Provisions**

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

**Addendum to Narrative**

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//