PERMIT AMENDMENT NO. 9711-153-0033-V-04-2 ISSUANCE DATE:



ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Robins Air Force Base

Facility Address: Highway 247 and Watson Boulevard

Robins AFB, Georgia 31098-1860, Houston County

Mailing Address: 78 CEG/CEIE 775 Macon Street, Bld. 1555

Robins AFB, Georgia 31098-2201

Parent/Holding Company: Robins Air Force Base

Facility AIRS Number: 04-13-153-00033

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

The re-assignment of building numbers, the addition of two new coating and depainting emission unit groups for Building 59D and Building 2390A, and the addition of two new High Velocity Oxygen Fuel (HVOF) Plasma booths in Building 327.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 9711-153-0033-V-04-0. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. 502331 dated January 7, 2022; any other applications upon which this Amendment or Permit No. 9711-153-0033-V-04-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **12** pages.



Richard E. Dunn, Director Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

In this modification Robins Air Force Base is proposing the re-assignment of building numbers, the addition of two new coating and depainting emission unit groups for Building 59D and Building 2390A, and the addition of two new High Velocity Oxygen Fuel (HVOF) Plasma booths in Building 327.

Re-assignment of Emission Unit Group CG06 from Building Number 59 to 59P

Emission Unit Group CG06 (Coating/Depainting Group 6) with emission units ID Nos. C047, C049, CS01, D016, SG47 and SG49 are currently assigned to Building 59. Robins AFB requests that Emission Unit Group CG06 and the associated emission units be assigned to Building 59P.

New coating and depainting Emission Unit Group CG08 for Building 59D

Robins AFB requests that new coating and depainting Emission Unit Group CG08 (Coating/Depainting Group 8) with emission units ID Nos. C054, D029, SG52, and CS01 be assigned to Building 59D.

The coating, depainting, and spray gun cleaning sources and equipment in Building 59D will function the same as similarly operating and permitted processes in Building 59P. These coating/depainting sources will primarily coat/depaint aircraft but may also be used for aerospace and non-aerospace parts. The coating devices will be high efficiency (e.g., high volume low pressure [HVLP] or air assisted airless[AAA] or comparable) in design for high coating transfer ratios leading to maximum application of coating to the surfaces and minimum overspray. The air flow in the hangar will be designed such that air flow will be along the longitudinal axis of the aircraft. The air filtration system will consist of a 3-stage dry particulate filter system.

New coating and depainting Emission Unit Group CG09 for Building 2390A

Robins AFB requests that a new coating and depainting emission unit group for a Narrow Body Paint Booth (NBPB) be assigned to Building 2390A. This group is designated Emission Unit Group CG09 (Coating/Depainting Group 9) with emission units ID Nos. C055, D030, SG53, and CS01.

The coating, depainting, and spray gun cleaning sources in Building 2390A will function the same as similarly operating and permitted processes in Buildings 59P or 59D. These coating/depainting sources will primarily coat/depaint aircraft but may also be used for aerospace and non-aerospace parts. The air flow in the hangar will be designed such that air flow will be along the longitudinal axis of the aircraft. The air filtration system will consist of a 3-stage dry particulate filter system.

Addition of two new High Velocity Oxygen Fuel (HVOF) booths Emission Unit ID Nos. HV03 and HV04 in Building 327

Add two new High Velocity Oxygen Fuel metal thermal spray coating sources with Emission Unit ID Nos. HV03 and HV04 in Building 327. The two new HVOF metal thermal spray coating booths will be similar in function to the two existing and permitted HVOF booths (Emission Unit ID Nos. HV01 and HV02). These metal thermal spray sources will apply specialized powder coatings to produce or repair hard bearing surfaces on select aerospace parts. The air flow in the booths will be designed such that the air flow will be across the part being processed and directed towards the filtration system. The air filtration systems will consist of a cartridge dust collector with HEPA filtration.

As per Condition 7.1.2 Robins AFB plans to move the existing HVOF booths ID Nos. HV01 and HV02 from Building 142 to Building 327 as soon as it is practical in order to consolidate these processes in one location for operational efficiency. They are requesting that the change from Building 142 to Building 327 be included with this modification.

In addition to the other requested changes, Robins AFB proposes the following administrative changes:

- a. Table 3.1 Remove the PSD Avoidance reference for Emission Unit Group BG02 since it does not have a PSD Avoidance cap.
- b. Table 3.1b Emission Unit ID No. G019 change the horsepower rating from 603 horsepower to 755 horsepower.
- c. Condition 6.2.46 For clarity, add Emission Unit Group SGC1 since requirements of Condition 6.2.46(f) apply to these emission units.
- d. The list of Insignificant Activities Based on Emissions Levels The number of Oil/Water Separators (Basewide) should be revised from 47 to 28.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Additional Emission Units

Table 3.1

Emission Units		Applicable	Air Pollution Control Devices	
ID No.	Description	Requirements/Standards	ID No.	Description
BG02	External combustion units in Bldg 644 that are subject to 40 CFR 60 Subpart Dc. [Boilers]	391-3-102(2)(d), 391-3-102(2)(g), 40 CFR 60 Subpart Dc, 40 CFR 63 Subpart DDDDD		
CG01	Aerospace surface coating equipment subject to 40 CFR 63 Subpart GG and 391-3-102(2)(kkk).	391-3-102(2)(b), 391-3-102(2)(e), 391-3-102(2)(kkk), 40 CFR 63 Subpart GG	See table 3.1c.	Dry filters.
CG02	Non-aerospace surface coating equipment not subject to 40 CFR 63 Subpart GG.	391-3-102(2)(b), 391-3-102(2)(e)	See table 3.1c.	Dry filters.
CG03	Surface coating and depainting operations in Bldg 50 that share a PSD avoidance permit condition.	40 CFR 52.21 - PSD Avoidance	C1C1 C1C2	Dry filters.
CG04	Surface coating and depainting operations in Bldg 180 that share a PSD avoidance permit condition.	40 CFR 52.21 - PSD Avoidance	See table 3.1c.	Dry filters.
CG05	Surface coating and depainting operations in Bldg 2036 that share a PSD avoidance permit condition.	40 CFR 52.21 - PSD Avoidance	See table 3.1c.	Dry filters.
CG06	Surface coating and depainting operations in Bldg 59P that share a PSD avoidance permit condition.	40 CFR 52.21 - PSD Avoidance	See table 3.1c.	Dry filters.
CG07	Surface coating and depainting operations in Bldg 2316.	391-3-102(2)(b), 391-3-102(2)(e), 391-3-102(2)(kkk), 40 CFR 63 Subpart GG	See table 3.1c.	Dry filters.
CG08	Surface coating and depainting operations in Bldg 59D that share a PSD avoidance permit condition.	391-3-102(2)(b), 391-3-102(2)(e), 391-3-102(2)(kkk), 40 CFR 63 Subpart GG 40 CFR 52.21 – PSD Avoidance	See table 3.1c.	Dry filters.
CG09	Surface coating and depainting operations in Bldg 2390A that share a PSD avoidance permit condition.	391-3-102(2)(b), 391-3-102(2)(e), 391-3-102(2)(kkk), 40 CFR 63 Subpart GG 40 CFR 52.21 – PSD Avoidance	See table 3.1c.	Dry filters.

Emission Units Air Pollution Control Devices Applicable ID No. Description Requirements/Standards ID No. **Description** CS01 Aerospace hand-wipe 40 CFR 63 Subpart GG cleaning operations. 391-3-1-.02(2)(kkk) HV03 **HVOF** metal plasma 391-3-1-.02(2)(b), HV3C Cartridge dust collector with HEPA filter. booth 391-3-1-.02(2)(e) HV04 **HVOF** metal plasma HV4C Cartridge dust collector 391-3-1-.02(2)(b), booth 391-3-1-.02(2)(e) with HEPA filter.

Table 3.1a. Emission Unit Group Listing for Robins AFB

Table 5.1a. Emission Unit Group Listing for Robins AFB						
Emission Unit Group	Emission Unit Group Name	Emission Unit ID Numbers in the Group				
CG01	Coating Group 1	C001, C002, C003, C004, C005, C006, C007,				
		C008, C009, C010, C015, C020, C028, C029,				
		C030, C036, C041, C042, C043, C044, C045,				
		C047, C049, C050, C052, C053, C054, C055				
CG02	Coating Group 2	C007, C008, C009, C010, C015, C022, C024,				
		C039, C043, C044, C046, C048, C049, C050,				
		C051, C053, C054, C055				
CG08	Coating/Depainting Operations	C054, CS01, D029, SG52				
	Group 8					
CG09	Coating/Depainting Operations	C055, CS01, D030, SG53				
	Group 9					
DG01	Depainting Group 1	A008, D001, D002, D003, D004, D005,				
		D007, D010, D012, D014, D015, D016,				
		D018, D019, D020, D021, D023, D024,				
		D026, D027, D028, D029, D030				
SGC1	Spray Gun Cleaning Group 1	SG01, SG02, SG03, SG05, SG08, SG15,				
		SG20, SG21, SG28, SG29, SG30, SG41,				
		SG44, SG47, SG49, SG50, SG51, SG52 ,				
		SG53				

Table 3.1b. Emission Unit Listing for Robins AFB

	Emission emit Eisting for Rosms 11	1	
Emission		Applicable	~
Unit ID	Emission Unit Description	Emission	Comments
No.		Unit Groups	
C047	Surface Coating-Painting	CG01, CG06	
	[Bldg 59P]		
C049	Surface Coating Spray Booth	CG01, CG02,	
	[adjacent to Bldg 59P]	CG06	
D016	Depainting Operation [Bldg 59P]	DG01, CG06	
G019	Diesel Generator No. 1, 755 Hp	IC05	Subject to 40 CFR 63 Subpart
	[Bldg 127]		ZZZZ.
			Emergency Use only.
SG47	Aerospace Spray Gun Cleaning	SGC1, CG06	
	[Bldg 59P]		
SG49	Aerospace Spray Gun Cleaning	SGC1, CG06	
	(Spray Booth) [Bldg 59P]		
C054	Surface Coating – Painting	CG01, CG02,	
	[Bldg 59D]	CG08	

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Table 3.1b. Emission Unit Listing for Robins AFB

Tubic bilbi	Emission Cint Listing for Robins A	1.0	
Emission		Applicable	2
Unit ID	Emission Unit Description	Emission	Comments
No.		Unit Groups	
C055	Surface Coating – Painting	CG01,CG02,	
	[Bldg 2390A]	CG09	
D029	Depainting Operations [Bldg 59D]	DG01, CG08	
D030	Depainting Operations	DG01, CG09	
D 030	[Bldg 2390A]	D001, C007	
SG52	Aerospace Spray Gun Cleaning [Bldg 59D]	SGC1, CG08	
SG53	Aerospace Spray Gun Cleaning [Bldg 2390A]	SGC1, CG09	
HV01*	HVOF Plasma Booth [Bldg 327]		
HV02*	HVOF Plasma Booth [Bldg 327]		
HV03	HVOF Plasma Booth [Bldg 327]		
HV04	HVOF Plasma Booth		
	[Bldg 327]		
CS01	Aerospace Hand-wipe Solvent	CG03, CG04,	
	Cleaning [Basewide]	CG05, CG06,	
		CG07, CG08 ,	
		CG09 , PG01	

^{*} Indicating the request to change the building number for Title V ID Nos. HV01 and HV02 to Building 327.

Table 3.1c. Air Pollution Control Device Listing for Robins AFB

APCD ID No.	APCD Description	Applicable Emission Unit Groups	Applicable Emission Unit ID Number	Comments
C47C	Dry filters (three-Stage) [Bldg 59P]	CG01, CG02, CG06	C047, D016	
C49C	Dry filters (Three-stage) [adjacent to Bldg 59P]	CG01, CG02, CG06	C049	
C54C	Dry filters (Three-stage) [Bldg 59D]	CG01, CG02, CG08	C054, D029	
C55C	Dry filters (Three-stage) [Bldg 2390A]	CG01, CG02, CG09	C055, D030	
HV1C	Cartridge dust collector with HEPA filter [Bldg 327]		HV01	
HV2C	Cartridge dust collector with HEPA filter [Bldg 327]		HV02	
HV3C	Cartridge dust collector with HEPA filter [Bldg 327]		HV03	

Table 3.1c. Air Pollution Control Device Listing for Robins	AFB
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APCD ID No.	APCD Description	Applicable Emission Unit Groups	Applicable Emission Unit ID Number	Comments
HV4C	Cartridge dust collector with HEPA filter [Bldg 327]		HV04	

^{*} Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

3.2 Equipment Emission Caps and Operating Limits

Modified Condition

3.2.14 The Permittee shall not discharge or cause the discharge into the atmosphere VOCs in amounts equal to or exceeding 40 tons from Emission Unit Group CG06 in **Building 59P** during any twelve consecutive month period.

[40 CFR 52.21 – PSD Avoidance]

New Conditions

- 3.2.15 The Permittee shall not discharge or cause the discharge into the atmosphere VOCs in amounts equal to or exceeding 40 tons from Emission Unit Group CG08 in Building 59D during any twelve consecutive month period.

 [40 CFR 52.21 PSD Avoidance]
- 3.2.16 The Permittee shall not discharge or cause the discharge into the atmosphere VOCs in amounts equal to or exceeding 40 tons from Emission Unit Group CG09 in Building 2390A during any twelve consecutive month period.

 [40 CFR 52.21 PSD Avoidance]

3.4 Equipment SIP Rule Standards

Modified Condition

3.4.3 The Permittee shall not cause, let, suffer, or allow the rate of emissions of particulate matter equal to or exceeding the following: $E = 4.1(P^{0.67})$ for Emission Unit Groups CG01, CG02, DG01, WF01, and Emission Unit ID Nos. D022, HV01, HV02, **HV03, HV04** and OV08, where E equals the emission rate in pounds per hour and P equals the process input rate in tons per hour.

[391-3-1-.02(2)(e)1(i)]

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

Modified Conditions

3.5.4 The Permittee shall perform filter changes of each stage of the filtration systems for Emission Unit Group CG02 and the HVOF metal plasma booth, and Emission Unit ID No. HV01,

HV02, **HV03**, **HV04**, and D022, according to the filter manufacturer's recommendations or locally prepared operating procedures. A record shall be kept of the dates filter changes were performed.

[391-3-1-.02(2)(a)10]

3.5.6 The Permittee shall operate the respective APCD ID Nos. HV1C, HV2C, **HV3C, or HV4C** (cartridge dust collectors with HEPA filters) whenever the associated Emission Unit ID Nos. HV01, HV02, HV03, or HV04 (thermal spray operations) are in use. [391-3-1-.02(2)(a)3(ii)]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

Modified Condition

5.2.12 The Permittee shall, while any of the HVOF metal plasma booths, Emission Unit ID Nos. HV01, HV02, HV03, or HV04, are in operation, continuously monitor the pressure drop across its dry particulate filter system and read and record the pressure drop at least once per shift. These records shall include the individual pressure drop readings and the acceptable range(s) of pressure drop as specified by the filter or booth manufacturer or in locally prepared operating procedures.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

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PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS

6.1 General Record Keeping and Reporting Requirements

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

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Equipment Emission Caps and Operating Limits

PSD/NSR Limitations

- ii. Any time VOC emissions from Emission Unit Group CG03, CG04, CG06, CG08, or CG09 equal or exceed 40 tons per any twelve consecutive month period, as specified by Conditions 3.2.1, 3.2.2, 3.2.14, 3.2.15, and 3.2.16.
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

- xxiii. Any failure to follow the filter change procedures for Emission Unit Group CG02 and Emission Unit ID Nos. D022, HV01, HV02, HV03, and HV04 as specified by Condition 3.5.4.
- xxvii. Any occurrence for which the pressure drop across the dry particulate filter system for the HVOF metal plasma booths, Emission Unit ID Nos. HV01, HV02, HV03 or HV04, is outside the proper operating range, as specified by Condition 5.2.12.
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:

Record Keeping and Reporting Requirements for PSD/NSR Limitations

ii. Notification if the VOC emissions from either Emission Unit Group CG03, CG04, CG06, CG08, or CG09 exceeded 9.99 tons during any three consecutive calendar month period in the reporting period, per Condition 6.2.5.

6.2 Specific Record Keeping and Reporting Requirements

Modified Conditions

- 6.2.4 The Permittee shall maintain monthly usage records of all materials containing VOC in Emission Unit Groups CG03, CG04, CG05, CG06, CG08, CG09, and Emission Unit ID No. D005 (part of Emission Unit Group DG01). These records shall include the total amount of material used and the VOC content of each material (expressed as a weight percentage). The records shall include the weight of any material disposed of as waste, if the waste data will be used as a credit in VOC emission calculations. All calculations used to figure usages shall be kept as part of the monthly record. These usage records shall be kept available for inspection or submittal for five years from the date of record.

 [40 CFR 52.21 PSD Avoidance]
- 6.2.5 The Permittee shall use the records required in Condition 6.2.4 to calculate the monthly VOC emissions for Emission Unit Groups CG03, CG04, CG05, CG06, CG08, and CG09. The Permittee shall notify the Division in writing if the VOC emissions exceed 9.99 tons during any three consecutive calendar month period for either Emission Unit Group CG03, CG04, CG06, CG08, or CG09 and 9.75 tons during any three consecutive calendar month period for Emission Unit Group CG05. This notification shall be postmarked by the sixtieth (60th) day following the end of the month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Conditions 3.2.1, 3.2.2, 3.2.3, 3.2.14, 3.2.15, and 3.2.16, respectively. These records shall be kept available for inspection or submittal for five years from the date of record. All calculations used to determine emissions should be kept as part of the monthly record.

 [40 CFR 52.21 PSD Avoidance]
- 6.2.6 The Permittee shall use the calculations required by Condition 6.2.5 to determine the twelve-month rolling total VOC emissions for each month and notify the Division in writing if these emissions exceed 40 tons during any twelve consecutive month period for either Emission Unit Group CG03, CG04, CG06, CG08, or CG09, or 39 tons during any twelve consecutive month period for Emission Unit Group CG05. This notification shall be postmarked by the sixtieth (60th) day following the end of the month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Conditions 3.2.1, 3.2.2, 3.2.3, 3.2.14, 3.2.15, and 3.2.16, respectively.

 [40 CFR 52.21 PSD Avoidance]
- 6.2.46 The Permittee shall maintain documentation of the following information for Emission Unit Group CG01 and SGC1:
 [391-3-1-.02(6)(b)(1) and 40 CFR 70.6(a)(3)(i)]
 - a. Documentation that the application techniques as specified in Condition 3.3.26 are the only application techniques that can be used to apply non-exempt primers and topcoats. This documentation shall include:
 - i. The type of coating application technique(s) used for each emission unit in Emission Unit Group CG01, and

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- ii. Documentation and written approval from the Division that any other coating application methods used in Emission Unit Group CG01 achieve emission reductions equivalent to HVLP or electrostatic spray application methods.
- b. Documentation that the application devices used to apply non-exempt primers and topcoats are operated per company procedures, local specified operating procedures, and/or manufacturer's specifications. This documentation shall include:
 - i. The operating procedures and/or specifications for each coating application device used in Emission Unit Group CG01, and
 - ii. Documentation that any modified surface coating application equipment used in Emission Unit Group CG01 achieves a transfer efficiency equivalent to HVLP or electrostatic spray application techniques.
- c. A description of the enclosure (per Condition 3.3.29) that is of sufficient detail so that the Division can determine if the enclosure is a paint booth or hanger in which air flow is directed downward or across onto the part and exhausted through one or more outlets.
- d. A description of the control device for each emission unit in Emission Unit Group CG01 that is of sufficient detail to verify that the exhaust air stream described in Condition No. 3.3.29 is controlled by one of the methods described in Condition 3.3.30.
- e. The proper operating range(s) specified by the filter or booth manufacturer or locally prepared operating procedures for the dry particulate filter systems associated with Emission Unit Group CG01 as specified in Condition 3.3.31.
- f. A description of the spray gun cleaning techniques utilized in each emission unit in Emission Unit Group SGC1 that is of sufficient detail to verify that the spray gun cleaning operations are using one or more of the techniques specified in Condition 3.3.35.
- g. Documentation that specifies that the dry particulate filter systems in Emission Unit Group CG01 are certified by the filter manufacturer to meet or exceed the efficiency data points of Tables 2, 3, 4 and 5 of Condition 3.3.30.

The above records shall be kept in a form suitable for submittal to the Division.

Attachments

B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups

ATTACHMENT B

NOTE: Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

I (STGT) I TOTT / TIME BIGED OF ENTERIOR EE / EE	
Description of Emission Units / Activities	Quantity
Oil/Water Separators (Basewide)	28