

Facility Name: U.S. Army Maneuver Center of Excellence – Fort Benning  
 City: Fort Benning  
 County: Chattahoochee  
 AIRS #: 04-13-215-00021

Application #: TV-213541  
 Date Application Received: September 04, 2018  
 Permit No: 9711-215-0021-V-04-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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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:

U.S. Army Maneuver Center of Excellence – Fort Benning.

2. Parent/Holding Company Name

United States Department of Defense, US Army.

3. Previous and/or Other Name(s)

U.S. Army Infantry Center – Fort Benning

4. Facility Location

1 Karker Street  
Fort Benning, Georgia 31905-5000, Chattahoochee County

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

The facility is located in 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
9711-215-0021-V-03-0	March 12, 2014	Title V renewal.
Off Permit Change (TV-23216)	May 1, 2015	The construction of a Battalion-scale waste to energy conversion system, which will operate 3-6 months at Fort Benning.
Off Permit Change (TV-23818)	July 11, 2016	An extension to the initial "off permit change" granted by the Division on May 1, 2015.
9711-215-0021-V-03-1	February 13, 2018	Title V amendment issued for the removal of boilers (H008, H010, H011, and H018 through H022) and paint booth P009 and inclusion of six insignificant boilers in Attachment B.

## D. Process Description

### 1. SIC Codes(s)

9711.

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)

U.S. Army Maneuver Center of Excellence – Fort Benning is a military installation with a primary mission of training and supporting the US Infantry soldiers. The facility does not produce hard good products on an ongoing basis as would be generated in a manufacturing facility, but on occasion produces products to support specific missions of the Army.

### 3. Overall Facility Process Description

The main purpose and mission of the US Army Maneuver Center of Excellence-Fort Benning is to provide training to military personnel and to provide mission ready units, with special capability in infantry and special forces, in support of worldwide US Army efforts. The facility is the headquarters for the Army's Infantry Center and the Armor School. The facility also houses combat units in residence on the base and operates the base's maintenance activities for the equipment that is used by these personnel.

Many of the emission sources are used to heat and cool buildings and housing. This includes a hospital and medical services clinics. The main support services for the base's mission also have emission sources. Most of these are related to maintaining and making available material, equipment and vehicles to Army personnel. These include vehicle maintenance and operational support equipment, such as storage tanks, paint booths, parts washers, wood chippers, a troop support center, an MWR maintenance shop, and a portable rock crusher. Because of the strategic mission of this base, the facility requires a large amount of emergency fuel in the event natural gas is not available to fuel boilers, heaters, and so on. A large liquid petroleum gas (LPG) peaking plant installed in 1999 supplies this backup fuel. The facility also has several large tanks for storing various kinds of distillate fuel oils.

Boilers (ID Nos. H001 – H003) are rated, each, at greater than 10 million Btu per hour and the facility has hundreds of insignificant (< 10 MMBtu/hr) boilers/heaters. These units are used to provide comfort heat and hot water and most of them fire natural gas and liquefied petroleum gas (LPG). Some of the larger-sized boilers are capable of firing distillate fuel oils as emergency backup fuels.

#### 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 a major source under 40 CFR 52.21, *Prevention of Significant Deterioration* (PSD), regulation. As stated in Title V renewal Application No. 213541, its potential-to-emit (PTE) for both of nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO) is more than 250 tons/year. However, a portion of the narrative for amendment No. 9711-215-0021-V-03-1 states: “*Since the facility is now restricted to burn only natural gas in the boilers that are capable of firing distillate fuel oils (ID Nos. H001, H002, and H003) in order to avoid being subject to 40 CFR 63 Subpart JJJJJ “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources,” the facility’s PTE for sulfur dioxide is now less than 250 tpy. The facility’s PTE for volatile organic compounds (VOC) and particulate matter (PM/PM10/PM2.5) is also less than 250 tpy, each.*”

#### 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

Due to the removal of several of its equipment, the facility is no longer a major source for hazardous air pollutants (HAPs) as defined in 40 CFR 63.2. The analysis conducted when Title V permit No. 9711-215-0021-V-03-0 was issued, on March 12, 2014, indicates that the facility is a minor source for HAPs. However, it appears that Conditions related 40 CFR Subpart GG, *National Emission Standards for Aerospace Manufacturing and Rework Facilities*, which applies to major sources of HAPs, were kept in said Title V renewal based on the, then, EPA's policy of "once in, always in." This policy was voided by EPA's January 25, 2018 memorandum titled "Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act."

By the virtue of it being an area source of HAPs, the base has equipment which is subject 40 CFR 63 Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. However, the facility boilers are not subject to 40 CFR 63 Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, because they all are gas-fired boilers. Also, the facility is not subject to 40 CFR 63 Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*, which has provisions that apply to both major and area sources of HAPs, because it choose to comply with the operating limits specified in Condition 3.3.2. Per 40 CFR 63.11169(d)(1), its paint spray booths are exempt from 40 CFR 63 Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*, because they are owned or operated by the Armed Forces of the United States.

### 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:

None applicable.

#### B. Applicable Rules and Regulations

Not applicable.

### C. Compliance Status

Title V renewal Application No. TV-213541 does not indicate that the facility is operating out of compliance with the rules and regulations.

### D. Permit Conditions

None applicable.

## III. Regulated Equipment Requirements

### A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
H001	Hospital Boiler No. 1 Cleaver Brooks ICB200-400-125HW Located in the Central Utility Plant for the new hospital 17.6x10 <sup>6</sup> Btu/hr heat input Firing: NG and DFO	40 CFR 60 Subpart Dc 391-3-1-.02(2)(d)	3.3.1 3.4.2 3.2.1, 3.2.5, 5.2.1 6.1.7, 6.2.1, 6.2.4 6.2.6, 6.2.11, 6.2.12	None	None
H002	Hospital Boiler No. 2 Cleaver Brooks ICB200-400-125HW Located in the Central Utility Plant for the new hospital 17.6x10 <sup>6</sup> Btu/hr heat input Firing: NG and DFO	40 CFR 60 Subpart Dc 391-3-1-.02(2)(d)	3.3.1 3.4.2 3.2.1, 3.2.5, 5.2.1 6.1.7, 6.2.1, 6.2.4 6.2.6, 6.2.11, 6.2.12	None	None
H003	Hospital Boiler No. 3 Cleaver Brooks ICB200-400-125HW Located in the Central Utility Plant for the new hospital 17.6x10 <sup>6</sup> Btu/hr heat input Firing: NG and DFO	40 CFR 60 Subpart Dc 391-3-1-.02(2)(d)	3.3.1 3.4.2 3.2.1, 3.2.5, 5.2.1 6.1.7, 6.2.1, 6.2.4 6.2.6, 6.2.11, 6.2.12	None	None
PWC1	Wood Chipper Bandit 3680 100 tons per hour Equipped with a 514 hp Diesel Engine	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1(i)	3.4.1 3.4.3 3.2.3, 3.2.6, 6.1.7 6.2.2, 6.2.7, 6.2.11	None	None
PWC2	Wood Chipper Bandit 3680 100 tons per hour Equipped with a 514 hp Diesel Engine	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1(i)	3.4.1 3.4.3 3.2.3, 3.2.6, 6.1.7 6.2.2, 6.2.7, 6.2.11	None	None
PRC1	Portable Eagle Rock Crusher 100 tons per hour Equipped with a 212 hp Diesel Engine	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1(i)	3.4.1 3.4.3 6.1.7, 6.2.3, 6.2.11	N/A	Water Spray Bar
TC01 thru TC14	Fourteen Engine Test Cells Located at the Armor School-Unit Maintenance Activities and Vehicle Maintenance Instruction Facility, Building 5205 One 600-BHp Bradley M2/M3 Fighting Vehicle Engine in Each Test Cell	391-3-1-.02(2)(b)1	3.4.1 3.2.7, 5.2.1, 6.1.7 6.2.2, 6.2.8, 6.2.9 6.2.10, 6.2.11	N/A	N/A

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
TC15 thru TC21	Seven Engine Test Cells Located at the Armor School-Unit Maintenance Activities and Vehicle Maintenance Instruction Facility, Building 5215 One 1,500-BHp M1 Abrams Tank Engine in Each Cell.	391-3-1-.02(2)(b)1	3.4.1 3.2.7, 5.2.1, 6.1.7 6.2.2, 6.2.8, 6.2.9 6.2.10, 6.2.11	N/A	N/A
N101	Liquid Petroleum Gas Peak Shaving Air Mixing Plant	391-3-1-.02(2)(e)1(i)	3.4.3 3.2.8, 5.2.1, 6.1.7 6.2.5, 6.2.11	NF01	Flare
TSC001	Troop Support Center Located in Building 3020	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1(i)	3.4.1 3.4.3 6.2.12	None	None
P006	DOL A/T Shop 4 Spray Paint Booth (Painting in support of the U.S. Army Infantry Museum) Located in Building 3207	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1(i)	3.3.4.1 3.4.3 3.3.8 thru 3.3.15 6.1.7	PC06	Dry filter system
P101	DCA Auto Service Center Spray Paint Booth (Hobby Shop for Soldiers) Located in Building 111	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1(i)	3.4.1 3.4.3 6.1.7	PC11	Dry filter system
P200	Spray Paint Booth (Vehicle equipment Maintenance) Located in Building 5320	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1(i)	3.4.1 3.4.3 6.1.7, 6.2.14	PC200	Filter
BB01	Bead Blasting Unit Located in Building 532	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1(i)	3.4.1 3.4.3	PC01	Filter
DG01	21 Cold Cleaners Located in Building 9106	N/A	3.3.2, 6.1.7, 6.2.14	None	None
T016	JP-8/JET A Storage Tank, Located near Building 2390 186,932 gallon capacity Internal floating roof design	N/A	6.2.15	None	None
T017	JP-8/JET A Storage Tank, Located near Building 2390 187,060 gallon capacity Internal floating roof design	N/A	6.2.15	None	None
T018	JP-8/JET A Storage Tank, Located near Building 2390 137,720 gallon capacity Fixed roof design	N/A	6.2.15	None	None
T019	JP-8/JET A Storage Tank, Located near Building 2390 137,586 gallon capacity Fixed roof design	N/A	6.2.15	None	None
T031	JP-8/JET A Storage Tank Located near Building 9031 20,000 gallon capacity Fixed roof design	N/A	6.2.15	None	None
T042	JP-8/JET A Storage Tank Located near Building 9128 20,000 gallon capacity Fixed roof design	N/A	6.2.15	None	None
T043	JP-8/JET A Storage Tank Located near Building 9128 20,000 gallon capacity Fixed roof design	N/A	6.2.15	None	None

## B. Equipment & Rule Applicability

Please refer to the narrative associated with Title V permit No. 9711-215-0021-V-03-0.

### Emission and Operating Caps:

Please refer to the narrative associated with Title V permit No. 9711-215-0021-V-03-0.

### Rules and Regulations Assessment:

Please refer to the narrative associated with Title V permit No. 9711-215-0021-V-03-0.

## C. Permit Conditions

The enclosed renewal permit carries over and updates most of the conditions of the current Title V permit. The following Table provides remarks on some the updates and renumbering changes which, chiefly, resulted from Title V amendment No. 9711-215-0021-V-03-1.

Section No.	Comments
Section 1	Section has been updated to remove equipment that no longer exist. Also, per the base request, is the number "250" has been removed from Section 1.3 because the base has a new hospital with less beds.
Section 2	No changes.
Section 3.1 <i>Emission Units Table 3.1</i>	Table 3.1 was revised to reflect current applicable rules and permit conditions which resulted from Title V amendment No. 9711-215-0021-V-03-1, which removed boilers (H008, H010, H011, and H018 through H022) and paint booth P009 and added six insignificant boilers in Attachment B. Also, T030 was removed because a notice has been submitted requesting its removal.
Section 3.2	Existing Condition 3.2.2 was deleted since boiler (H008, H010, and H011) were removed. Condition 3.2.3, which is now Condition 3.2.2, was modified to remove reference to boilers (H018 through H022) that were removed (It was, also, written in a generic format). Condition 3.2.7 was deleted since boiler H008 was removed. Condition 3.2.8 was deleted since boilers (H010, and H011) were removed. Condition 3.2.9 was deleted since boilers (H018 through H022) were removed.
Section 3.3	Condition 3.3.1 was modified to remove references to boilers (H018 through H022) that were removed. Condition 3.3.2 was deleted since boiler H008 was removed. Condition 3.3.5 was deleted since paint booth P009 was removed. Condition 3.4.1 was modified to remove reference to paint booth P009 that was removed. Condition 3.4.2 was modified to remove references to boilers (H008, H010, H011 and H018 through H022) that were removed. Also, the Conditions related 40 CFR Subpart GG were removed since EPA abandoned its "once in, always in" policy.
Section 3.4	Since paint booth P009 was removed and to avoid unnecessary future modifications, Condition 3.4.3 has been rewritten in a generic format.
Section 3.5	No changes.
Sections 4.1	No changes.
Section 4.2	Testing Condition 4.2.1 was deleted since boiler H008 was removed. It was replaced with a generic condition addressing NSPS general testing requirements.
Section 5.2	Condition 5.2.1 was modified to delete references to boilers (H008, H010, H011 and H018 through H22) and paint booth P009 and associated baghouse B114. Conditions b and f were deleted. Condition 5.2.2 was deleted since baghouse B114 for paint booth P009 was removed. Conditions 5.2.3 and 5.2.4 were deleted.
Section 6.1	Condition 6.1.7 has been updated.
Section 6.2	Section 6.2 has been updated in accordance with the changes of amendment No. 9711-215-0021-V-03-1 and remove Conditions related 40 CFR Subpart GG.



**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**

Not applicable.

**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**

Please refer to the narrative associated with Title V permit No. 9711-215-0021-V-03-0.

**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.

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

Please refer to the narrative associated with Title V permit No. 9711-215-0021-V-03-0.

**VII. Specific Requirements****A. Operational Flexibility**

Conditions 7.1.2 through 7.1.6 includes the provisions for operational flexibility under a national security emergency.

**B. Alternative Requirements**

None applicable.

**C. Insignificant Activities**

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

**D. Temporary Sources**

None applicable.

**E. Short-Term Activities**

None applicable.

**F. Compliance Schedule/Progress Reports**

None applicable.

**G. Emissions Trading**

None applicable.

**H. Acid Rain Requirements**

None applicable.

**I. Stratospheric Ozone Protection Requirements**

None applicable.

**J. Pollution Prevention**

None applicable.

**K. Specific Conditions**

None applicable.

**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.//