

# **Statement of Basis**

**Tier I Operating Permit No. T1-2019.0051**

**Project ID 62331**

**U S Air Force-Mountain Home AFB  
Mountain Home Air Force Base, Idaho**

**Facility ID 039-00001**

**Final**

**October 6, 2020**

**Joe Palmer** *KW*

**Permit Writer**

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

**TABLE OF CONTENTS**

**1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE .....3**

**2. INTRODUCTION AND APPLICABILITY.....4**

**3. FACILITY INFORMATION .....5**

**4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY .....8**

**5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY .....8**

**6. EMISSIONS LIMITS AND MRRR.....14**

**7. REGULATORY REVIEW .....35**

**8. PUBLIC COMMENT .....37**

**9. EPA REVIEW OF PROPOSED PERMIT .....37**

APPENDIX A - EMISSIONS INVENTORY

APPENDIX B - FACILITY COMMENTS ON DRAFT PERMIT

## 1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

ASTM	American Society for Testing and Materials
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CI	compression ignition
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	CO <sub>2</sub> equivalent emissions
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
FRA	Federal Requirements Applicability
GHG	greenhouse gases
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MHAFB	U S Air Force-Mountain Home AFB
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O <sub>2</sub>	oxygen
PC	permit condition
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
PW	process weight rate
RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period

T1	Tier I operating permit
U.S.C.	United States Code
VOC	volatile organic compound

## 2. INTRODUCTION AND APPLICABILITY

U S Air Force-Mountain Home AFB (MHAFB) is a United States Air Force Base, and is located at 366 Gunfighter Ave Suite 331 in Mountain Home. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit oxides of nitrogen above the major source threshold of 100 tons-per-year. HAP emissions are below the major source thresholds of 10 tons-per-year for any single HAP and 25 tons-per-year for any combination of HAP.

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for MHAFB.

The format of this Statement of Basis follows that of the permit. MHAFB Tier I operating permit is organized into sections. They are as follows:

### **Section 1 – Acronyms, Units, and Chemical Nomenclature**

The acronyms, units, and chemical nomenclature used in the permit are defined in this section.

### **Section 2 - Tier I Operating Permit Scope**

The scope describes this permitting action.

### **Section 3 - Facility-wide Conditions**

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements (MRRR) sufficient to assure compliance with a permit condition follows the permit condition.

### **Sections 4 through 10 - Emissions Unit Group 1: Jet Engine Testing – Hush House 1, Building 1344, and Hush House 2, Building 270, Emissions Unit Group 2: Aircraft and Aircraft Parts Surface Coating Spray Booths – Building 1330, Emissions Unit Group 3: Flight Line Area Spray Painting, Emissions Unit Group 4: Vehicle Spray Paint Booth, Emissions Unit Group 5: Bead-Blasting Unit-Building 1330, Emissions Unit Group 6: Miscellaneous Sources, Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart III.**

The emissions unit-specific sections of the permit contain the applicable requirements that specifically apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the Facility-wide Conditions Section. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements (MRRR) sufficient to assure compliance with an applicable requirement follows the applicable requirement.

### **Section 11 - Non-applicable Requirements and Insignificant Activities**

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

This section contains a list of units or activities that are insignificant on the basis of size or production rate. Units and activities listed in this section must be listed in the permit application. The regulatory citation for units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

## Section 12 - General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I facilities. The General Provisions have been reviewed by EPA and contain all terms and conditions required by IDAPA 58.01.01 et al as well as requirements from other air quality laws, rules and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and a rule or permit, the rule or permit shall govern.

### Appendix A

Asbestos contingency plan.

## 3. FACILITY INFORMATION

### 3.1 Facility Description

U S Air Force-Mountain Home AFB operates as an existing air force base. The emissions units at the facility are listed in Section 2 above. Emissions units descriptions are detailed in the specific section of each emission unit in the Tier I operating permit.

### 3.2 Facility Permitting History

#### Tier I Operating Permit History - Previous 5-year permit term May 8, 2015 to May 8, 2020.

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from May 8, 2015, to May 8, 2020. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

May 15, 2019	T1- 2012.0062, Administrative amendment to add a 1000 kW diesel emergency generator in Building 3492 and to add the existing asbestos contingency plan , Permit status (A) but will become (S) as a result of this permitting action.
August 19, 2016	T1-2012.0062, Administrative amendment to correct typographical errors and remove permit conditions for Kewanee boilers, Permit status (S)
May 8, 2015	T1-2012.0062, Tier I operating renewal, Permit status (S)

#### Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

August 23, 2012	PTC No. P-2012.0029 Proj 61056, a PTC modification to use natural gas exclusively and no longer use oil for backup in the hospital boilers, and to replace three existing 750 kW diesel emergency generators with two new 800 kW diesel emergency generators. This PTC replaced P-060068, issued May 24, 2007 (A)
May 24, 2007	PTC No. P-060068, a PTC modification for changing monitoring and operation requirements, and including permit conditions in PTC No. P-040025 issued October 1, 2004 (more details can be found below under "M"). (S)
May 14, 2007	PTC No. P-060048, an initial PTC for four Barrier flight line generator engines. (A)
October 1, 2004	PTC No.P-040026, a PTC revision for change of responsible official and facility contact person. (S)
April 9, 2003	PTC No.P-030004, a PTC revision for change of responsible official. (S)

May 30, 2002 A revised and consolidated PTC was issued for the following sources:

- Hospital Boilers (more details can be found below under “C”)
- Hush House I and Hush House II (more details can be found below under “E”)
- Bead-Blasting Unit (more details can be found below under “G”)
- Flight Line Area Spray Painting (more details can be found below under “I”)
- Vehicle Spray Painting Booth (more details can be found below under “J”)
- Aircraft and Aircraft Parts Surface-coating Spray Booths Building 1330 (Corrosion Control Hangar) (more details can be found below under “F” and “G”) (S)

The following provides detailed background for revised and consolidated PTC No. P-060068 issued May 24, 2007.

A. Hospital Incinerator

Per a DEQ inspection conducted on July 25, 1997, the hospital medical waste incinerator was rendered inoperable sometime in 1995 and removed from the base sometime in 1996.

- October 4, 1989 A modified PTC was issued for the medical waste incinerator. (T)
- November 15, 1988 A modified PTC was issued for the medical waste incinerator. (S)
- June 19, 1986 A PTC was issued for a medical waste incinerator for the new base hospital. (S)

B. Central Heat Plant

- November 2, 2001 A request to cancel the PTC for the central heat plant was received. The central heat plant was permanently closed on November 30, 2001. (T)
- November 15, 1999 A modified PTC was issued for the central heat plant. This permit supersedes all other permits issued for the central heat plant. (S)
- January 8, 1996 A modified PTC was issued for the central heat plant. (S)
- March 31, 1995 A modified PTC was issued for the central heat plant. (S)
- June of 1993 A PTC was issued for the central heat plant, authorizing a change in fuel from coal to natural gas. (S)
- July 31, 1980 A state of Idaho operating permit was issued for the central heat plant. The expiration date of this permit was July 30, 1985. (S)

C. Hospital Boilers

- November 18, 1998 A PTC was issued for the operation of three boilers at the base hospital. (S)

D. Portable Sources

- October 5, 2001 DEQ received a memorandum dated October 5, 1999, written by David C. Bray, Senior Air Pollution Scientist, Office of Air Quality, EPA Region 10, addressing portable sources operating on military installations. Portable sources are not considered part of the base; therefore, their emissions are not counted. Portable sources are not included in this permit. (S)
- August 28, 2000 A modified PTC was issued for portable source operations. This permit supersedes all other permits issued for portable source operations. (S)
- April 19, 2000 A PTC was issued to allow portable sources (rock crushers, hot-mix asphalt plants, and concrete batch plants) to operate on the base. (S)

E. Jet Engine Testing

- November 30, 1999 A PTC was issued to allow jet engine testing in the hush houses. (S)  
September 13, 1996 An exemption from permitting requirements was issued for Hush House 1 (S)

F. Corrosion Control Hangar 1330

- April 27, 2001 A modified PTC was issued for the corrosion control paint booth. (S)  
January 17, 2001 A modified PTC was issued for the corrosion control paint booth. (S)  
September 22, 1995 A modified PTC was issued for the corrosion control paint booth. (S)  
February 2, 1995 A PTC was issued for the corrosion control aircraft paint booth. (S)

G. Bead-blasting Hangar 1330

- November 22, 1995 A PTC was issued for the bead-blasting unit in hangar 1330. (S)

H. Corrosion Control Hangar 192

- December 16, 1997 An exemption from permitting requirements was issued for the corrosion control aircraft paint booth located in hangar 192. (A)

I. Flight Line Area Spray Painting

- March 30, 2000 A modified PTC was issued for the flight line area spray painting operations. (S)  
November 8, 1999 A PTC was issued for the flight line area spray painting operations. (S)

J. Vehicle Spray Paint Booth

- September 19, 1999 A modified PTC was issued for the vehicle paint booth. (S)  
April 18, 1996 A modified PTC was issued for the vehicle paint booth. (S)  
May 28, 1992 A PTC was issued for a vehicle spray paint booth. (S)

K. Aerospace Ground Equipment (AGE)

- July 31, 2000 DEQ issued an exemption from permitting requirements for all turbine engine AGE. (A)  
June 7, 2000 EPA issued a ruling allowing the internal combustion AGE to be considered a non-road engine and therefore exempt from permitting and registration fee payment. (A)

L. Base Hospital, Ethylene Oxide Gas Sterilizer

- September 3, 1996 An exemption from permitting was issued for a backup, ethylene-gas sterilizer. The ethylene oxide sterilizer has since been removed. (T)

M. Hurst Boiler and Three CAT Generator Engines

- May 25, 2004 PTC No.P-030037, initial PTC for installing a dual-fuel burner for the Hurst boiler at MHAFB hospital, and increasing operation hours of three CAT generators (S)  
October 1, 2004 PTC No.P-040025, PTC revision for names change of responsible official and facility contact person. (S)

## 4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

### 4.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit.

### 4.1 Application Chronology

October 29, 2019	DEQ received an application.
December 20, 2019	DEQ determined that the application was complete.
June 19, 2020	DEQ made available the draft permit and statement of basis for peer and regional office review.
July 1, 2020	DEQ made available the draft permit and statement of basis for applicant review.
July 29 – August 28, 2020	DEQ provided a public comment period on the proposed action.
September 1, 2020	DEQ provided the proposed permit and statement of basis for EPA review.
October 6, 2020	DEQ issued the final permit and statement of basis.

## 5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

### 5.1 Process No. 1 - Emissions Unit Group 1: Jet Engine Testing – Hush House 1, Building 1344, and Hush House 2, Building 270.

Table 5.1 lists the emissions units and control devices associated with Emissions Unit Group 1: Jet Engine Testing – Hush House 1, Building 1344, and Hush House 2, Building 270.

**Table 5.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Hush House No. 1	Hush House No. 1	None	Hush House No. 1 Stack
Hush House No. 2	Hush House No. 2	None	Hush House No. 2 Stack

MHAFB tests aircraft engines as required by operational conditions. The engines are tested in one of two “hush-houses,” which were constructed to minimize the noise from engine test operations. The stack has numerous baffles to dissipate the sound energy. Engines are removed from aircraft and transported to one of the hush houses, affixed to a test stand, and then adjusted and/or repaired. Upon completion of the adjustments and repairs, the engine is test fired at idle, approach, intermediate, military and/or afterburner power settings for a short time period. Each criteria pollutant has an individual emissions rate when operated at each power setting.

### 5.2 Process No. 2 - Emissions Unit Group 2: Aircraft and Aircraft Parts Surface Coating Spray Booths – Building 1330.

Table 5.2 lists the emissions units and control devices associated with Emissions Unit Group 2: Aircraft and Aircraft Parts Surface Coating Spray Booths – Building 1330.

**Table 5.2 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
LPB-1330	Large paint booth, LPB-1330	PM filters, carbon adsorption filter	LPB stack
SPB-1330	Small paint booth, SPB-1330	PM filters	SPB stack

The corrosion control treating process consists of surface preparation and painting aircraft and aircraft parts in one of two paint booths. Aircraft and some parts are treated in the large paint booth (LPB-1330), and parts are painted in the small paint booth (SPB-1330). The items to be treated are first cleaned with solvents, then painted using high-volume, low pressure (HVLP) paint spray guns. The painting equipment is cleaned using solvents after use. Both paint booths exhaust through particulate filters that have a manufacturer-rated efficiency of 97%. The large paint booth also exhausts through a carbon adsorption filter, which has a manufacturer-rated efficiency of 90% for VOC emissions. The underlying PTC limits the amount of paint and solvent used on a 24-hour and annual basis. Also, the amount of paint used containing HDI (CAS No. 822-06-0; Hexamethylene Diisocyanate) is limited daily.

### 5.3 Process No. 3 - Emissions Unit Group 3: Flight Line Area Spray Painting.

Table 5.3 lists the emissions units and control devices associated with Emissions Unit Group 3: Flight Line Area Spray Painting.

**Table 5.3 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
NA	Flight line area spray painting	HVLP spray guns	Fugitive emissions

MHAFB conducts open-air spray painting operations in the flight line area. This area includes, but is not limited to, aircraft ramps, aprons, open hangars, and static display aircraft. The coatings are applied using HVLP spray equipment.

### 5.4 Process No. 4 – Emissions Unit Group 4: Vehicle Spray Paint Booth

Table 5.2 lists the emissions units and control devices associated with Emissions Unit Group 4: Vehicle Spray Paint Booth.

**Table 5.4 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Building 1100	Vehicle spray paint booth	Particulate filters	Paint booth stack

Building 1100 contains a vehicle spray paint booth that is used to paint the facility's vehicles (trucks, buses, etc.) and parts as needed.

### 5.5 Process No. 5 – Emissions Unit Group 5: Bead-Blasting Unit-Building 1330

Table 5.2 lists the emissions units and control devices associated with Emissions Unit Group 5: Bead-Blasting Unit-Building 1330.

**Table 5.5 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Building 1330	Bead-blast booth	Dust collector	Bead-blast stack

A plastic media bead-blast unit installed in Building 1330 is used to strip paint from small components such as fuel tanks and bomb racks. The booth vents through a particulate filter rated at 99.9% efficient for removing particles one micron or greater and 100% efficient for particles two microns or greater.

**5.6 Process No. 6 – Emissions Group 6: Miscellaneous Sources**

Table 5.2 lists the emissions units and control devices associated with Emissions Group 6: Miscellaneous Sources.

**Table 5.6 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
PB-198	Miscellaneous Sources	Particulate and HEPA filter, VOC carbon absorption	Various Stacks

Several air pollution sources exist at MHAFFB, which are exempt from obtaining a PTC in accordance with IDAPA 58.01.01.220-223. A source is exempt from obtaining a PTC only if operated in accordance with the information on which the exemption was based. The miscellaneous sources consist of, but are not limited to, turbine aerospace ground equipment (turbine AGE), PB-198 (B-1 hangar), fire training pit, and ordinance disposal.

Generally, applicable requirements for all sources previously determined to be exempt from PTC requirements are contained in the Facility-wide Permit Conditions.

**5.7 Process No. 7 – Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart III**

Table 5.2 lists the emissions units and control devices associated with Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart III.

**Table 5.7 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emission Point ID No.
Building 196, stationary emergency diesel generator, 10 kW	None
Building 258, stationary emergency diesel generator, 200 kW	None
Building 261, stationary emergency diesel generator, 250 kW	None
Building 508, stationary emergency diesel generator, 200 kW	None
Building 610, stationary emergency diesel generator, 300 kW	None
Building 1341, stationary emergency diesel generator, 250 kW	None
Building 1795, stationary emergency diesel generator, 150 kW	None
Building 2316, stationary emergency diesel generator, 100 kW	None
Building 3020, stationary emergency diesel generator, 25 kW	None
Building 3210, stationary emergency diesel generator, 60 kW	None
Building 3240, stationary emergency diesel generator, 25 kW	None
Building 3492, stationary emergency diesel generator, 1000 kW	None
Building 3499, stationary emergency diesel generator, 100 kW	None
Building 3503, stationary emergency diesel generator, 25 kW	None
Building 3535, stationary emergency diesel generator, 25 kW	None
Building 3539, stationary emergency diesel generator, 25 kW	None
Building 6000 (Hospital), stationary emergency diesel generator #1, 800 kW	None
Building 6000 (Hospital), stationary emergency diesel generator #2, 800 kW	None
Building 6300, stationary emergency diesel generator, 10 kW	None
Building 6398, stationary emergency diesel generator, 350 kW	None
Building 6399, stationary emergency diesel generator, 350 kW	None
Building 13509, stationary emergency diesel generator, 20 kW	None

The MHAFFB has 22 existing stationary emergency diesel generator engines that are subject to 40 CFR 60 Subpart III. The two Building 6000 (Hospital) emergency generator engines were permitted for the hospital in PTC No. P-2012.0029 Proj 61056, issued on August 23, 2012. The applicable requirements of

Subpart IIII for the hospital generator engines are now included in the Emission Unit Group 7 of this permit.

## 5.8 Insignificant Emissions Units Based on Size or Production Rate

This section contains a list of units or activities that are insignificant on the basis of size or production rate. Units and activities listed in this section must be listed in the permit application. Table 5.8 lists the units and activities which have been determined to be insignificant on the basis of size or production rate. The regulatory authority for emissions units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

**Table 5.8 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION**

<b>Emissions Unit / Activity</b>	<b>Regulatory Authority / Justification</b>
Fuel system/fuel dispensing, and fuel loading racks as identified in the renewal application received October 2, 2012	IDAPA 58.01.01.317.01(b)(i)(30)
<u>Above ground storage tanks</u>	
Base wide – storage tanks of 260 gallons or less	IDAPA 58.01.01.317.01(b)(i)(1) and (30)
Base wide – storage tanks of 10,000 gallons or less	IDAPA 58.01.01.317.01(b)(i)(3) and (30)
Two 1,500,000 above ground storage (AST) tanks	IDAPA 58.01.01.317.01(b)(i)(30)
<u>External combustion sources</u>	
Base wide – additional external combustion sources less than 5 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(5)
Base wide – external combustion sources less than 0.5 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(6)
Base wide – external combustion sources less than 1 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(7)
Hospital Boiler – Hurst, natural gas, 1.05 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(5)
Surface coating activities as identified in the renewal application received October 2, 2012	IDAPA 58.01.01.317.01(b)(i)(17) and (30)
Fuel tank repair as identified in the renewal application received October 2, 2012	IDAPA 58.01.01.317.01(b)(i)(30)
Petroleum soil bioremediation site as identified in the renewal application received October 2, 2012	IDAPA 58.01.01.317.01(b)(i)(30)
Welding as identified in the renewal application received October 2, 2012	IDAPA 58.01.01.317.01(b)(i)(9)
Composite sanding booth activities as identified in the renewal application received October 2, 2012	IDAPA 58.01.01.317.01(b)(i)(30)

## 5.9 Non-applicable Requirement Determination

The facility provided a list of non-applicability determinations for some federal regulations with the application for T1-2012.0062 issued May 8, 2015. DEQ reviewed the information provided in the past application and have listed those determinations for future reference.

Prevention of Significant Deterioration (PSD) 40 CFR Part 52.21. The PSD rules found at 40 CFR 52.21 and IDAPA 58.01.01.205 do not apply to MHAFB, as the regulated pollutants in this section, after controls, do not equal or exceed the major stationary source threshold of 250 tons per year (40 CFR 52.21(b)(1)(i)(b)).

Risk Management Plan (RMP) Chemical Accident Prevention Provisions 40 CFR Part 68. The RMP rules do not apply, at the time of permitting issuance as no regulated toxic or flammable substances are present in a process at MHAFB above the thresholds found at 40 CFR 68.130.

New Source Performance Standards (NSPS) 40 CFR Part 60 - Subpart Ka. Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification

Commenced After May 18, 1978, and Prior to July 23, 1984. Three jet fuel tanks that contain a storage capacity greater than 40,000 gallons are located at MHAFB. Each jet fuel storage tank was constructed prior to May 18, 1978, and has not been modified or reconstructed, and not subject to Subpart Ka. In addition, JP-8 has a vapor pressure less than 3.5 Kpa.

New Source Performance Standards (NSPS) 40 CFR Part 60 - Subpart Kb. Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. MHAFB contains four tanks with storage capacities between 75 and 151 m<sup>3</sup> with vapor pressures less than 15 kPa. These tanks are exempt from all Subpart Kb requirements, including notification and recordkeeping. Notification and recordkeeping requirements were also eliminated for tanks with capacities less than 75 m<sup>3</sup>.

NSPS 40 CFR Part 60 Subpart WWW - Emission Standards for Municipal Waste Landfills. The onsite Municipal Waste Landfill contains MSW below the threshold design capacity of 2.5 million mega grams. Therefore, it is not subject to NSPS Subpart WWW.

NSPS 40 CFR Part 60 - Subpart GG. Standards of Performance for Stationary Gas Turbines. The four flight line generators are not subject to this standard, as they are not gas turbines.”

#### Subpart MM – Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations

MHAFB operates a Vehicle Spray Paint booth to spray paint existing government vehicles (trucks, buses, etc.) and automobile parts as required for repair and maintenance. The Vehicle Spray Paint booth will apply a separate prime coat and topcoat using the same spray gun to paint or coat damaged vehicle and automobile parts.

This NSPS is applicable to “automobile or light-duty truck assembly plants” at 40 CFR 60.390(c). This term is not defined in this standard but is specifically applies to “plants” which are considered to be large assembly plants for the manufacture of new vehicles.

The term “automobile and light duty truck surface coating operation” is defined at 40 CFR Part 63 subpart IIII ”National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks”. The EPA defines an automobile and light duty truck bodies or collections of body parts for new automobiles or new light duty trucks. (Emphasis added. Proposed Rule 67 FR 78611, December 24, 2002).

The spray booth at the MHAFB is not a plant and does not assemble new automobile or light-duty trucks. Therefore, per 60.390(a), Subpart MM does not apply to the Vehicle Spray Paint booth.

#### 40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants

Section 112 of the Clean Air Act (CAA) Amendments relates to the release of air toxic contaminants. The requirements of CAA Section 112(g) or (j) are not applicable because the facility is not a major source of HAPs (40 CFR 63.40(b)). Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAPS) apply to both major sources of HAPs, defined as PTE equal to or greater than 10 tons per year for any single HAP or PTE equal to or greater than 25 tons per year for total HAP, and area sources of HAPs as defined as any stationary source of HAPs that is not a major source. As HAP emissions are below major source thresholds, MHAFB is not a major source of HAPs. However, the base is an area source of HAPs.

#### 40 CFR Part 63 Subpart DDDDD – Industrial, Commercial and Institutional Boilers and Process Heaters

This Subpart establishes national emission limits and work practice standards for hazardous air pollutants emitted from industrial, commercial, and institutional boilers and process heaters. MHAFB is not a major source of HAP emissions; therefore, this subpart is not applicable.

#### 40 CFR Part 63 Subpart PTTTT – Engine Test Cells/Stands

This Subpart establishes NESHAP for engine test cells/stands located at major sources of hazardous air pollutants emissions. MHAFB is not a major source of HAP emissions; therefore, this subpart is not applicable.

40 CFR Part 63 Subpart BBBBBB – NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

MHAFB receives four types of fuel (gasoline, propane, diesel, and jet fuel) to support its current military mission. Gasoline, propane, and diesel fuel are received by the base via tanker and jet fuel is received via pipeline from bulk terminal in the City of Mountain Home, Idaho. In addition, jet fuel may also be distributed to MHAFB by tanker truck depending on demand. MHAFB does not operate or maintain a bulk terminal, bulk plant, or pipeline facility for gasoline distribution and is not subject to the requirements in 40 CFR 63.11081.

40 CFR Part 63 Subpart JJJJJJ – NESHAP for Industrial, Commercial, and Institutional Boilers area Sources

MHAFB operates and maintains hundreds of small (less than 10 MMBTU/hr) boilers for building heat for each building throughout the base. MHAFB operates these boilers exclusively on natural gas or propane. Therefore, in accordance with 40 CFR 63.11195(e), a gas-fired boiler is not subject to this subpart. A gas-fired boiler is defined as a boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

**5.10 Emissions Inventory**

Table 5.9 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

Listed below Table 5.9 are the references for the emission factors used to estimate the emissions. The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix A of this statement of basis.

**Table 5.9 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)**

Source Description	PM <sub>10</sub> T/yr	NO <sub>x</sub> T/yr	SO <sub>2</sub> T/yr	CO T/yr	VOC T/yr	HAP T/yr
Jet Engine Testing – Hush House Nos. 1 & 2 (Permitted)	4.0	85.0	1.5	63.0	13.0	0.46
Aircraft Paint Booth (Permitted)	0.078				0.015	0.023
Aircraft Parts Paint Booth (Permitted)	0.044				0.009	0.025
Flightline Open-Area Spraying (Permitted)	0.003				1.5	0.002
Vehicle Paint Booth (Permitted)					4.0	0.0004
Bead-blasting Unit (Cr+6 Permitted)	0.002					2.0E-06
Turbine AGE	0.0562	0.486	0.0817	1.462	0.0720	
Fire Training	1.02	0.05	0.04	1.64	3.06	0.0462
Ordinance Disposal (Munitions)	0.01	0.03		0.50		0.0134
Internal Combustion Sources	0.60	9.89	0.51	2.57	0.67	0.0315
Insignificant Activities – Fuel Dispensing					0.79	0.0228
Insignificant Activities – Fuel Loading					1.42	0.0823
Insignificant Activities - Aboveground Storage Tanks (ASTs)					9.93	0.409
Insignificant Activities - External Combustion Sources	1.32	14.61	0.10	14.60	0.96	0.459
Insignificant Activities – Welding/Soldering/Cutting	0.15					0.0526
Insignificant Activities - Woodworking	0.000811					
Insignificant Activities – Miscellaneous Chemicals					5.23	0.477
Insignificant Activities – Degreasing/Solvent Cleaning					2.30	
Insignificant Activities – Open Burn/Open Detonation	0.005	0.001	0.000005	0.002	0.000072	0.00150
Insignificant Activities - Roads	25.183					
Insignificant Activities – Spills/Release					0.696	0.0195
Insignificant Activities – Underground Storage Tank (UST)					0.01	0.0006
<b>Total Emissions</b>	<b>32.47</b>	<b>110.07</b>	<b>0.73</b>	<b>83.77</b>	<b>43.66</b>	<b>2.13</b>

## 6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this T1 facility.

This section is divided into the following subsections.

- Facility-Wide Conditions;
- Emissions Unit Group 1: Jet Engine Testing – Hush House 1, Building 1344, and Hush House 2, Building 270 Emissions Limits;
- Emissions Unit Group 2: Aircraft and Aircraft Parts Surface Coating Spray Booths – Building 1330 Emissions Limits;
- Emissions Unit Group 3: Flight Line Area Spray Painting Emissions Limits;
- Emissions Unit Group 4: Vehicle Spray Paint Booth Emissions Limits;

- Emissions Unit Group 5: Bead-Blasting Unit - Building 1330 Emissions Limits;
- Emissions Unit Group 6: Miscellaneous Sources Emissions Limits;
- Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart III Emissions Limits;
- Tier I Operating Permit General Provisions.

### ***MRRR***

Monitoring, recordkeeping and reporting requirements (MRRR) are the means with which compliance with an applicable requirement is demonstrated. In this section, the applicable requirement (permit condition) is provided first followed by the MRRR. Should an applicable requirement not include sufficient MRRR to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit (i.e. gap filling). In addition to the specific MRRR provided for each applicable requirement, generally applicable facility-wide conditions and general provisions may also be provided, such as performance testing, reporting, and certification requirements.

The legal and factual basis for each permit condition is provided for in this document. If a permit condition was changed due to facility draft comments or public comments, an explanation of the changes is provided.

### ***State Enforceability***

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

### ***Federal Enforceability***

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

## **6.1 Facility-Wide Conditions**

### **Permit Condition 3.1 - Fugitive Dust**

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/2007]

### **MRRR (Permit Conditions 3.2 through 3.4)**

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint; and
- Conduct facility-wide inspections of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

### **Permit Condition 3.5 - Odors**

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/1994]

### **MRRR (Permit Condition 3.6)**

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint; and
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State only), 5/1/1994]

### **Permit Condition 3.7 - Visible Emissions**

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/2000]

### **MRRR (Permit Condition 3.8 through 3.9)**

- Conduct facility-wide inspections of all emissions units subject to the visible emissions standards (or rely on continuous opacity monitoring);
- If visible emissions are observed, take appropriate corrective action and/or perform a Method 9 opacity test;
- Maintain records of the results of each visible emissions inspection.

[IDAPA 58.01.01.322.06, 07, 5/1/1994]

### **Permit Conditions 3.10 through 3.14 - Excess Emissions**

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the excess emissions facility wide conditions and the regulations of IDAPA 58.01.01.130-136.

[IDAPA 58.01.01.130-136, 4/5/2000]

### **MRRR (Permit Conditions 3.11 through 3.14)**

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory; and
- Notify DEQ of each excess emissions events as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ; and
- Maintain records of each excess emissions event.

[IDAPA 58.01.01.130-136, 4/5/2000]

### **Permit Condition 3.15 – Fuel-Burning Equipment PM Standards**

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/1994]

## **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 3.16 - Sulfur Content Limits**

The permittee shall not sell, distribute, use, or make available for use any of the following:

- Distillate fuel oil containing more than the following percentages of sulfur:
  - ASTM Grade 1 fuel oil, 0.3% by weight.
  - ASTM Grade 2 fuel oil, 0.5% by weight.
- Coal containing greater than 1.0% sulfur by weight.
- DEQ may approve an exemption from these fuel sulfur content requirements (IDAPA 58.01.01.725.01 725.04) if the permittee demonstrates that, through control measures or other means, SO<sub>2</sub> emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 3/29/2010]

### **MRRR - (Permit Condition 3.17)**

The permittee shall maintain documentation of supplier verification of fuel sulfur content on an as received basis.

[IDAPA 58.01.01.322.06, 5/1/1994]

### **Permit Condition 3.18 - Open Burning**

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 5/08/2009]

## **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 3.19 - Asbestos**

The permittee shall comply with all applicable requirements of 40 CFR 61, Subpart M—“National Emission Standard for Asbestos.”

[40 CFR 61, Subpart M]

The permittee shall comply with all applicable requirements of the Asbestos Contingency Plan included as section “13 Appendix: Asbestos Contingency Plan” in this permit and the requirements of 40 CFR 61.145(b)(4)(vi), (vii), (xii), and (xvi).

[40 CFR 61.145(b)(4)(vi), (vii), (xii), and (xvi)]

## **MRRR**

The permittee shall document the information as required in the Asbestos Contingency Plan included in section “13 Appendix: Asbestos Contingency Plan” of the permit and the requirements of 40 CFR 61.145(b)(4)(vi), (vii), (xii), and (xvi).

### **Permit Condition 3.20 - Accidental Release Prevention**

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.  
[40 CFR 68.10 (a)]

**MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 3.21 - Recycling and Emissions Reductions**

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.  
[40 CFR 82, Subpart F]

**MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 3.22 through 3.23- NSPS/NESHAP General Provisions**

This facility is subject to NSPS 40 CFR 60 Subpart IIII, and NESHAP 40 CFR 63 Subparts ZZZZ, and CCCCCC, and GG and is therefore required to comply with applicable General Provisions.  
[40 CFR 60/63, Subpart A]

**Permit Condition 3.24 – National Emission Standards for Aerospace Manufacturing and Rework Facilities**

The permittee shall submit an emission inventory of all hazardous air pollutants emitted by all affected stationary sources, as defined by 40 CFR 63.741.c, that are located in the contiguous area under the permittee’s common control. This emission inventory to include speciation of hazardous air pollutants must be submitted in accordance with Permit Condition 3.30, and shall be used to demonstrate compliance to maintain synthetic minor status regarding 40 CFR 63, Subpart GG.  
[40 CFR 63, Subpart GG]

**Permit Condition 3.25 - Monitoring and Recordkeeping**

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.06, 07, 5/1/1994]

**Permit Conditions 3.26 through 3.29 - Performance Testing**

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by

DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used.
- Any extenuating or unusual circumstances regarding the proposed test.
- The proposed schedule for conducting and reporting the test.

[IDAPA 58.01.01.157, 4/5/2000; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/1994]

### **MRRR (Permit Conditions 3.26 through 3.29)**

The permittee shall submit compliance test report(s) to DEQ following testing.

[IDAPA 58.01.01.157, 4/11/2015; IDAPA 58.01.01.322.06, 08.a, 09, 4/5/2000]

### **Permit Condition 3.30 - Reports and Certifications**

This permit condition establishes generally applicable MRRR for submittal of reports, certifications, and notifications to DEQ and/or EPA as specified.

[IDAPA 58.01.01.322.08, 11, 4/5/2000]

### **Permit Condition 3.31 - Incorporation of Federal Requirements by Reference**

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein.

[IDAPA 58.01.01.107, 3/29/2017]

## **6.2 Emissions Unit-Specific Emissions Limits and MRRR**

The emergency hospital generator engines were moved from Emissions Unit Group 8 in the T1-2012.0062, May 15, 2019, amended permit to Emissions Unit Group 7 in this permit.

Permit Condition 3.32 – The permittee shall comply with 40 CFR 63 Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, as applicable, and all applicable general provisions of 40 CFR 63 Subpart A. Within the context of 40 CFR 63 Subpart ZZZZ, the terms “you” and “your” mean “permittee” and “permittee’s” respectively.

Subpart ZZZZ applies to each affected source that is any existing, new, or reconstructed stationary Reciprocating Internal Combustion Engine (RICE) located at a major or area source of HAP emissions as required in 40 CFR 63.6590(a).

Pursuant to 40 CFR 63 Subpart A and §63.10(b)(3), for affected stationary RICE which are exempted from the requirements of Subpart ZZZZ or the requirements of Subpart A, the permittee shall maintain documentation which demonstrates the affected stationary RICE’s exemption. The sources are listed in Table 3.4 below.

[40 CFR 63 Subpart ZZZZ]

**Table 3.4 EXISTING EMERGENCY STATIONARY RICE – SUMMARY OF TABLE 2d TO SUBPART ZZZZ OF PART 63**

Emission Source	Building	Shop	Fuel	Emergency Engine (Y/N)	Power Rating (kW)	Subpart Applicability
<b>On Base Generators</b>						
IC0206	206	FIRE STATION #1	Diesel	Yes	60	ZZZZ
IC0517	517	LIFT STATION 1	Diesel	Yes	25	ZZZZ
IC1014	1014	SP/LE DESK	Diesel	Yes	25	ZZZZ
IC1298	1298	LIFT STATION 3	Diesel	Yes	25	ZZZZ
IC1302	1302	CE CONTRL/DCC	Diesel	Yes	50	ZZZZ
IC1402	1402	WELL #4	Diesel	Yes	300	ZZZZ
IC1403	1403	WATER PLANT	Diesel	Yes	150	ZZZZ
IC1413	1413	Sewage Lift #2	Diesel	Yes	25	ZZZZ
IC1501	1501	COMMAND POST	Diesel	Yes	100	ZZZZ
IC1819	1819	Sewage Lift #6	Diesel	Yes	25	ZZZZ
IC2103	2103	WELL #2	Diesel	Yes	150	ZZZZ
IC2192	2192	WELL #12	Diesel	Yes	500	ZZZZ
IC2316	2316	Dining Facility	Diesel	Yes	100	ZZZZ
IC2708	2708	LIFT STATION 4	Diesel	Yes	25	ZZZZ
IC3491	3491	WWTP	Diesel	Yes	1200	ZZZZ
IC3502	3502	GATR	Diesel	Yes	25	ZZZZ
IC3600	3600	CONTROL TOWER	Diesel	Yes	100	ZZZZ
IC4799	4799	N MELLON BOOSTER	Diesel	Yes	25	ZZZZ
IC5250	5250	500K WATER TOWER	Diesel	Yes	35	ZZZZ
IC6400	6400	MAIN GATE	Diesel	Yes	25	ZZZZ
IC8077	8077	1 M GALLON TANK	Diesel	Yes	60	ZZZZ
<b>Fire Pumps</b>						
IC0197.1	197	AFFF	Diesel	Yes	227	ZZZZ
IC0197.2	197	AFFF	Diesel	Yes	227	ZZZZ
IC0197.3	197	AFFF	Diesel	Yes	227	ZZZZ
IC0197.4	197	AFFF	Diesel	Yes	227	ZZZZ
IC1347.1	1347	AFFF	Diesel	Yes	227	ZZZZ
IC1347.2	1347	AFFF	Diesel	Yes	227	ZZZZ
IC1347.3	1347	AFFF	Diesel	Yes	227	ZZZZ
IC1347.4	1347	AFFF	Diesel	Yes	227	ZZZZ

Permit Condition 3.33 – 40 CFR 63.6595(a) – Compliance Date for Affected Sources.

In accordance with 40 CFR 63.6595(a), the permittee must comply with the applicable 40 CFR 63 Subpart ZZZZ emission limitations and operating limitations no later than the date(s) specified in §63.6595.

[40 CFR 63.6595]

Permit Condition 3.34 through 3.35 – 40 CFR 63, Subpart ZZZZ

On and after the applicable compliance date(s) specified in 40 CFR 63.6595, the permittee shall meet the applicable requirements specified in Table 3.5 (Table 2d to Subpart ZZZZ of Part 63) in accordance with 40 CFR 63.6603 for the respective emergency stationary RICE.

**Table 3.5 EXISTING EMERGENCY STATIONARY RICE – SUMMARY OF TABLE 2d TO SUBPART  
ZZZZ OF PART 63**

For each . . .	You must meet the following requirement, except during periods of startup . . .	During periods of startup you must . . .
Existing emergency stationary CI RICE <sup>(a),(c)</sup>	<ul style="list-style-type: none"> <li>• Change oil and filter every 500 hours of operation or annually, whichever comes first;<sup>(b)</sup></li> <li>• Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;</li> <li>• Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</li> </ul>	

- a) If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.
- b) Sources have the option to utilize an oil analysis program as described in §63.6625(i) and (j) in order to extend the specified oil change requirement in Table 2d of this subpart.
- c) Sources can petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.

[40 CFR 63.6603]

On and after the applicable compliance date(s) specified in 40 CFR 63.6595, the permittee shall at all times operate and maintain the emergency engine(s), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions, in accordance with 40 CFR 63.6605.

[40 CFR 63.6605]

MRRR – (permit Condition 3.36 through 3.39)

On and after the applicable compliance date(s) specified in 40 CFR 63.6595, the permittee shall meet the monitoring, installation, collection, operation, and maintenance requirements specified in Subpart ZZZZ of Part 63 in accordance with 40 CFR 63.6625. The permittee shall:

- Operate and maintain the existing emergency engine(s) and after-treatment control device (if any) according to the manufacturer’s emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine(s) in a manner consistent with good air pollution control practice for minimizing emissions, in accordance with 40 CFR 63.6625I.
- Install a non-resettable hour meter if one is not already installed, in accordance with 40 CFR 63.6625(f).
- Minimize the engine(s)’ time spent at idle during startup and minimize the engine(s)’ startup time to a period needed for appropriate and safe loading of the engine(s), not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2.23.1 (Table 2d to Subpart ZZZZ) apply, in accordance with 40 CFR 63.6625(h).
- Have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2.23.1 (Table 2d to Subpart ZZZZ) in accordance with 40 CFR 63.6625 (i) and (j). The analysis program must be part of the maintenance plan for the engine(s).

- If any of the limits are exceeded, the oil shall be changed within 2 days of receiving the results of the analysis; if the engine(s) is not in operation when the results of the analysis are received, the oil shall be changed within 2 days or before commencing operation, whichever is later.
- The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine(s).

[40 CFR 63.6625]

On and after the applicable compliance date(s) specified in 40 CFR 63.6595, the permittee shall demonstrate continuous compliance with each applicable emission limitation and operating limitation in Table 3.5 (Table 2d to Subpart ZZZZ of Part 63) according to the methods specified in Table 3.6 (Table 6 to Subpart ZZZZ of Part 63), in accordance 40 CFR 63.6640(a).

**Table 3.6 SUMMARY OF TABLE 6 TO SUBPART ZZZZ OF PART 63**

For each . . .	Complying with the requirement to . . .	You must demonstrate continuous compliance by . . .
Existing emergency stationary RICE located at an area source of HAP	Work or Management practices	<ul style="list-style-type: none"> <li>• Operating and maintaining the stationary RICE according to the manufacturer’s emission-related operation and maintenance instructions; or</li> <li>• Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.</li> </ul>

- On and after the applicable compliance date(s) specified in 40 CFR 63.6595, the permittee shall report each instance in which each applicable emission limitation or operating limitation in Table 2d to Subpart ZZZZ was not met in accordance with 40 CFR 63.6640(b). These instances are deviations from the emission and operating limitations. These deviations must be reported according to the requirements in 40 CFR 63.6650.
- The permittee shall also report each instance in which the applicable requirements in Table 8 to Subpart ZZZZ of Part 63 were not met in accordance with 40 CFR 63.6640I.
- On and after the applicable compliance date(s) specified in 40 CFR 63.6595, the permittee shall operate the emergency engine(s) according to the requirements in 40 CFR 63.6640(f)(1)(i) through (iii). Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year is prohibited. If you do not operate the engine(s) according to these requirements, the engine(s) will not be considered an emergency engine(s) and will need to meet all requirements for non-emergency engines.
  - There is no time limit on the use of emergency stationary RICE in emergency situations.
  - The permittee shall operate the emergency engine(s) for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company associated with the engine(s). Maintenance checks and readiness testing of such units is limited to 100 hours per year. A petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.
  - The permittee may operate the emergency engine(s) up to 50 hours per year in non-emergency situations, but those 50 hours are counted toward the 100 hours per year provided for maintenance and testing.

[40 CFR 63.6640]

On and after the applicable compliance date(s) specified in 40 CFR 63.6595, the permittee shall keep the records described in 40 CFR 63.6655 in accordance with 40 CFR 63.6655 and 40 CFR 63.6660.

- Records required in Table 6 of 40 CFR 63, Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies to you.
- Records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan.
- Records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).
- The permittee shall keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- The permittee shall keep each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- The permittee must keep records of hours of operation of the CI engines in accordance with 40 CFR 63.6655(f).

On and after the applicable compliance date(s) specified in 40 CFR 63.6595, the permittee shall comply with the applicable portion of general provisions in Table 8 to 40 CFR 63, Subpart ZZZZ in accordance with 40 CFR 63.6665.

The permittee shall comply with the requirements of 40 CFR 63 Subpart A – General Provisions.

**[40 CFR 63.6611, 40 CFR 63.6665, 40 CFR 63 Subpart A]**

Permit Condition 3.40 through 3.43 – 40 CFR 63 Subpart CCCCCC

The permittee shall comply with 40 CFR 63 Subpart CCCCCC-National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, as applicable, and all applicable general provisions of CFR 63 Subpart A.

Subpart CCCCCC applies to fuel dispensing at MHAFB which may include, but is not limited to, the transfer of fuels from above ground storage tanks, underground storage tanks, and tanker trucks into various engine fuel tanks (i.e., aircraft, motor vehicles, and other equipment).

In accordance with 40 CFR 63.11111, for compliance with NESHAP Subpart CCCCCC, gasoline throughput from the gasoline storage tank shall not exceed 10,000 gallons per month.

**[40 CFR 63.11111]**

In accordance with 40 CFR 63.11111, if the affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold.

**[40 CFR 63.11111]**

In accordance with 40 CFR 63.11112, the emission sources to which this subpart applies are gasoline storage tanks and associated equipment components in vapor or liquid gasoline service at existing gasoline dispensing facilities (GDF) that meet the criteria specified in § 63.11111. Pressure/vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at GDF are covered emission sources.

**[40 CFR 63.11111]**

In accordance with 40 CFR 63.11116(a), the permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

- Minimize gasoline spills;

- Clean up spills as expeditiously as practicable;
- Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
- Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

In accordance with 40 CFR 63.11117(b), the permittee must only load gasoline into storage tanks at the facility by utilizing submerged filling, as defined in 40 CFR 63.11132, and the following:

- Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the tank;
- Submerged fill pipes installed after November 9, 2006, must be no more than 6 inches from the bottom of the tank;
- Submerged fill pipes not meeting the specification of the two statements above are allowed if the permittee can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by the Administrator's delegated representative during the course of a site visit; and
- Gasoline storage tanks with a capacity of less than 250 gallons are not required to comply with the submerged fill requirements in 40 CFR 63.11117(b), but must comply only with all of the requirements in 40 CFR 63.11116.

**[40 CFR 63.11116, 40 CFR 63.11117]**

In accordance with 40 CFR 63.11113 and 40 CFR 63.11116I, the permittee shall comply with the standards in this subpart no later than January 10, 2011.

**[40 CFR 63.11113]**

MRRR – (permit Condition 3.44 through 3.47)

In accordance with 40 CFR 63.11115(b) and 40 CFR 63.11125(d), the permittee shall keep records as specified below:

- Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

**[40 CFR 63.11115, 40 CFR 63.11125]**

In accordance with 40 CFR 63.11111I, the permittee shall monitor and record monthly throughput of gasoline from the gasoline storage tank to demonstrate compliance with the NESHAP Subpart CCCCC Gasoline Throughput Limit permit condition. Records required under this paragraph shall be kept for a period of five years.

**[40 CFR 63.11111]**

In accordance with 40 CFR 63.11116(b), the permittee is not required to submit notifications or reports as specified in §63.11125, §63.11126, or subpart A of this part, the permittee must have records available within 24 hours of a request by the Administrator to document gasoline throughput.

**[40 CFR 63.11116]**

In accordance with 40 CFR 63.11115(b) and 40 CFR 63.11126(b), the permittee shall report, by March 15 of each year, the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission

limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.11115(a), including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred.

[40 CFR 63.11115, 40 CFR 63.11126]

Emissions Unit Group 1: Jet Engine Testing – Hush House 1, Building 1344, and Hush House 2, Building 270

Permit Condition 4.1 - Emissions Limits – (PTC No P-2012.0029, Proj 61056, August 23, 2012)

Particulate matter, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emissions from the Hush House 1 and 2 augmentortubes shall not exceed any corresponding emissions rate limit listed in Table 4.3 below.

**Table 4.3 Emissions Unit Group 1: Jet Engine Testing – Hush House 1, Building 1344, and Hush House 2, Building 270 Emission Limits <sup>(a)</sup>**

Source Description	PM/PM <sub>10</sub> <sup>(b)</sup>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
	T/yr <sup>(c)</sup>	T/yr <sup>(c)</sup>	T/yr <sup>(c)</sup>	T/yr <sup>(c)</sup>	T/yr <sup>(c)</sup>
Hush Houses 1 and 2 combined	4.0	1.5	85	63	13

- a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c) Tons per any consecutive 12-calendar month period.

MRRR - (Permit Condition 4.2 through 4.5 and 3.25)

Compliance with the PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, and CO emissions limits in Permit Condition 4.1 is determined by Permit Condition 4.2 (operating hour limits) and Permit Condition 4.5 (monitoring and recording hours of operations.)

Compliance with the tons per year emissions limits from the Hush House 1 and Hush House 2 can be determined through calculations using AP-42 or other DEQ-approved emissions factors. Emissions calculations shall be kept at the site in accordance with Facility-wide Permit Condition 3.25.

Emissions Unit Group 2: Aircraft and Aircraft Parts Surface Coating Spray Booths – Building 1330

Permit Condition 5.1 - PM Emissions Limits – (PTC No. P-2012.0029, Proj 61056, August 23, 2012)

No person shall discharge to the atmosphere from any source operating on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 9,250 lb/hr,  

$$E = 0.045(PW)^{0.6}$$
- b. If PW is equal to or greater than 9,250 lb/hr,  

$$E = 1.10(PW)^{0.25}$$

MRRR - (Permit Condition 3.25)

If the permittee chooses to assure compliance through testing, the appropriate test methods for PM process weight rate shall be in accordance with IDAPA 58.01.01.157. The permittee may also choose to assure compliance through calculations using AP-42 or other DEQ-approved emissions factors and a maximum process throughput (see Permit Conditions 5.2, 5.3, and 5.4). Any recordkeeping and monitoring information maintained for process weight rate shall be retained for a period of five years in accordance with Facility-wide Condition 3.25.

Permit Conditions 5.2 and 5.3 – Operating Requirements – (PTC No. P-2012.0029, Proj 61056, August 23, 2012)

**LPB – 1330 Throughput Limits**

The maximum throughput of all coatings and solvents in the aircraft painting booth (LPB-1330) shall not exceed 684 gal/day or 1,250 gallons per any consecutive 12-month period.

**SPB – 1330 Throughput Limits**

The maximum throughput of coatings and solvents in the aircraft parts painting booth (SPB-1330) shall not exceed 140 gal/day or 350 gallons per any consecutive 12-month period.

**MRRR – (Permit Condition 5.8, Throughput Monitoring)**

The permittee is required to ensure through monitoring that:

The permittee is required to monitor and record the throughput (type and amount) of all coatings and solvents applied in painting booths nos. LPB-1330 and SPB-1330 on days of application. Throughput must be recorded in gal/day and gal per any consecutive 12-month period. The consecutive 12-month period throughput shall be calculated monthly. All record shall be retained for five years at the site in accordance with Facility-wide Condition 3.25.

**Permit Condition 5.4 – Operating Requirements for Hexamethylene Diisocyanate (HDI) – (PTC No. P-2012.0029, Proj 61056, August 23, 2012)**

The maximum daily throughput of materials containing not more than 1% by weight HDI (CAS No. 822-06-0) shall be limited to the quantities listed in the following tables. The maximum daily throughput of materials containing in excess of 1% by weight HDI (CAS No. 822-06-0) shall be determined on a case-by-case basis.

**Aircraft and Aircraft Parts Surface Coating Spray Booths  
No More than 1% HDI (CAS No. 822-06-0) Containing Material Throughput Limitations**

**Table 5.3 LPB-1330 THROUGHPUT LIMITS**

HDI Upper Limit	Density Range		Calculated Throughput Limit
	Lower	Upper	
C (wt%)	$\rho$ (lb/gal)	$\rho$ (lb/gal)	Q (gal/day)
1.0%	< 8.0	8.0	431
1.0%	8.0	10.0	345
1.0%	10.0	12.0	288
1.0%	12.0	14.0	246
1.0%	14.0	16.0	216

**Table 5.4 SPB-1330 THROUGHPUT LIMITS**

HDI Upper Limit	Density Range		Calculated Throughput Limit
	Lower	Upper	
C (wt%)	$\rho$ (lb/gal)	$\rho$ (lb/gal)	Q (gal/day)
1.0%	<8.0	8.0	32
1.0%	8.0	10.0	25
1.0%	10.0	12.0	21
1.0%	12.0	14.0	18
1.0%	14.0	16.0	16

MRRR (Permit Condition 5.10, Monitoring of HDI-Containing Materials)

The permittee is required to ensure through monitoring that:

The permittee shall record the days of application for all materials used in the booths that contain quantifiable amounts of HDI. The records shall contain, but are not limited to, the following information: the name and identification number of each HDI-containing product used, its content of HDI in percent by weight (wt%), the density of each HDI-containing product in pounds per gallon (lb/gal), throughput calculations for materials containing more than 1% by weight HDI, and the amount used in gallons of each product. All record shall be retained for five years at the site in accordance with Facility-wide Condition 3.25.

Permit Conditions 5.5 through 5.7 – Operating Requirements [Maintain Efficiency of the Booth, Pressure Drop for Filtration System, and the use of HVLP Spray Paint Guns] – (PTC No. P-2012.0029, Proj 61056, August 23, 2012)

The permittee is required to ensure through monitoring that:

- The permittee shall conduct inspections of the LPB-1330 particulate-matter filtration system, the LPB 1330 VOC adsorption system, and the SPB-1330 particulate-matter filtration system on days the paint booths are in operation. The filtration systems shall be maintained in accordance with manufacturer specifications and the filtration system Operations and Maintenance (O&M) manual.
- The pressure drop across the LPB-1330 and SPB-1330 particulate-matter filtration systems shall be maintained within the manufacturer or O&M manual specifications.

The permittee shall use HVLP spray guns or equivalent low-emissions spray guns for bulk-paint applications.

MRRR (Permit Condition 5.9 and 5.11, Filtration System Inspection and Maintenance, O&M Manual)

The permittee is required to ensure through monitoring that:

- The permittee shall maintain records of all inspections and maintenance performed on the LPB-1330 particulate-matter filtration system, the LPB-1330 VOC adsorption system, and the SPB-1330 particulate-matter filtration system. The records shall include, but are not limited to, the date of the inspection and/or maintenance performed, the relative condition of the filter pads, and the type of maintenance performed (e.g., replacement of pads, etc.). All record shall be retained for five years at the site in accordance with Facility-wide Condition 3.25.
- The permittee shall have developed an O&M Manual for the LPB-1330 particulate-matter filtration system and VOC adsorption system, and the SPB-1330 particulate-matter filtration system. The manual shall describe the procedures that will be followed to comply with the manufacturer specifications for the air pollution control devices. This manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

### Emissions Unit Group 3: Flight Line Area Spray Painting

Permit Condition 6.1 – VOC Emissions Limits – (PTC No. P-2012.0029, Proj 61056, August 23, 2012)

Emissions of VOC shall not exceed 1.5 T/yr.

MRRR - (permit Condition 6.2 through 6.4, 3.25)

The permittee is required to ensure through monitoring that:

- The paint throughput is limited to 16.1 gal/day and not to exceed 300 gal/yr.
- To use a HVLP spray paint guns, or equivalent.
- To monitor the type and amount of paint used daily, monthly, and annually.
- Retain records of the paint used at the source for five years and in accordance with the Facility-wide Condition 3.25.

#### Emissions Unit Group 4: Vehicle Spray Paint Booth

Permit Condition 7.1 and 7.2 – PM and VOC Emissions Limits – (PTC No. P-2012.0029, Proj 61056, August 23, 2012)

Emissions of PM and VOC shall not exceed any of the following limits:

- PM Emissions Limits – Process weight rate equations per IDAPA 58.01.01.701.01
  - a. If PW is less than 9,250 lb/hr,
$$E = 0.045(PW)^{0.6}$$
  - b. If Pw is equal to or greater than 9,250 lb/hr,
$$E = 1.10(PW)^{0.25}$$
- VOC Emissions Limits

Emissions of VOC shall not exceed 4 T/yr.

MRRR - (Permit Condition 7.3 through 7.8, 3.25)

The permittee is required to ensure through monitoring that:

- The paint throughput is limited to 300 gal/yr.
- To use a HVLP spray paint guns, or equivalent.
- To monitor the type and amount of paint used daily, monthly, and annually.
- The pressure drop across the filtration system is within manufacturer specifications.
- To inspect the filtration system when the paint booth is in operation and maintain it in accordance with the manufacturer specifications. The records of inspections and maintenance must be recorded and compiled and retained at the site such as the type of maintenance performed, date of inspection performed, etc.
- To retain records of the paint used at the source for five years and in accordance with the Facility-wide Condition 3.25.

#### Emissions Unit Group 5: Bead-Blasting Unit-Building 1330

Permit Condition 8.1 and 8.2 – PM and VOC Emissions Limits – (PTC No. P-2012.0029, Proj 61056, August 23, 2012)

Emissions of Hexavalent chromium ( $Cr^{+6}$ ) and PM shall not exceed any of the following limits:

- $Cr^{+6}$  Emissions Limits

Emissions of  $Cr^{+6}$  shall not exceed 0.137 lb/yr.

- PM Emissions Limits – Process weight rate equations per IDAPA 58.01.01.701.01
  - a. If PW is less than 9,250 lb/hr,
$$E = 0.045(PW)^{0.6}$$
  - b. If PW is equal to or greater than 9,250 lb/hr,
$$E = 1.10(PW)^{0.25}$$

MRRR - (Permit Condition 8.3 through 8.7, 3.25)

The permittee is required to ensure through monitoring that:

- The bead-blast unit is not operating more than 4,500 hours per any consecutive 12-monh period.
- The annual average weight percent of hexavalent chromium is not to exceed 1.075% of the PM controlled by the dust collector per year.

- The dust collector is operated and maintained in accordance with the manufacturer specifications.
- The operating hours of the bead-blast unit is recorded and maintained and the records be retained at the site for five year in accordance with Facility-wide Condition 3.25.
- The PM collected from the dust collector assembly is sampled to determine the weight percent of Cr<sup>+6</sup> for determining compliance with Permit Condition 8.4 (Hexavalent Chromium Weight Percent). The material collected is required to be sampled and analyzed prior to disposal. All of this information is needed to be compiled for the most recent five years and the sampling records be retained at the site in accordance with Facility-wide Condition 3.25.

Emissions Unit Group 6: Miscellaneous Sources

A minor change is made to this section of the permit. The “all fixed internal combustion generator and pump engines and the generators and pumps range in size from 5 to 1609 hp” portion of the summary description is deleted from the section. Internal combustions engines that are previously qualified as insignificant activities have been removed from the list because they are subject to either Subparts ZZZZ or IIII. Therefore, the applicable requirements associated with those engines are addressed in this renewal under the corresponding subpart that applies to them in this permit.

No other changes are made to this section of the permit from that of the previous Tier I operating permit No.T1-2007.0041 issued July, 22, 2008.

Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart IIII

Permit Condition 10.1 Emissions Limits pertain to all emergency diesel generators in this Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart IIII

A detailed regulatory analysis is contained in Appendix A of T1-2012.0062 Proj 61117 “Statement of Basis” dated May, 8, 2015.

Permit Condition 10.2 Emissions Limits pertains only to the two Building 6000 (Hospital) emergency generator engines:

**Table 10.3 EMERGENCY GENERATOR ENGINES EMISSIONS LIMITS <sup>(a)</sup>**

Source Description	SO <sub>2</sub>	NO <sub>x</sub>
	T/yr <sup>(b)</sup>	T/yr <sup>(b)</sup>
Emergency Generator IC Engines	0.01	5.80

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) Tons per any consecutive 12-calendar month period.

Permit Condition 10.3 – NSPS 40 CFR 60, Subpart IIII – Compliance Requirements pertains to all emergency diesel generators in this Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart IIII

- The emergency generator engine may be operated for the purpose of maintenance checks and readiness testing in accordance with 40 CFR 60.4211(e), provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine.
  - Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary internal combustion engines in emergency situations.
  - For approval of additional hours to be used for maintenance checks and readiness testing, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the emergency engines beyond 100 hours per year.
  - Any operation other than emergency operation, and maintenance and testing is prohibited.

- The permittee shall operate and maintain the emergency generator engines and the control devices according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer, in accordance with 40 CFR 60.4211(a). In addition, the permittee may only change those settings that are permitted by the manufacturer. The permittee shall also meet the requirements of 40 CFR parts 89, 94 and/or 1068, as applicable.

[40 CFR 60.4211]

Permit Condition 10.4 – NSPS 40 CFR 60, Subpart IIII – Operating and Maintenance Requirements pertains to all emergency diesel generators in this Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart IIII

The permittee shall operate and maintain emergency stationary internal combustion engines that achieve the emission standards as required in 40 CFR 60.4205(b) according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer, over the entire life of the engine, in accordance with 40 CFR 60.4206.

[40 CFR 60.4205, 40 CFR 60.4206; IDAPA 58.01.01.322.06, 5/1/1994; PTC No. P-2012.0029, 8/23/2012]

MRRR (Permit Condition 10.5) - NSPS 40 CFR 60, Subpart IIII – Monitoring Requirements pertains to all emergency diesel generators in this Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart IIII

The permittee shall meet the monitoring requirements of 40 CFR 60.4209. In addition, the permittee shall also meet the monitoring requirements specified in 40 CFR 60.4211.

- The permittee shall install a non-resettable hour meter on the emergency generator, prior to startup of the engine.
- If the emergency generator is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the permittee when the high backpressure limit of the engine is approached.

[40 CFR 60.4209, 40 CFR 60.4211]

MRRR - (Permit Condition 10.6) – NSPS 40 CFR 60, Subpart IIII – Fuel Requirements pertain to all emergency diesel generators in this Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart IIII

The permittee shall use diesel fuel that meets the requirements of 40 CFR 80.510(b), in accordance with 40 CFR 60.4207(b) as follows:

- 15 parts per million by weight (ppmw) maximum sulfur content; and a
- Minimum cetane index of 40, or maximum aromatic content of 35 volume percent.

[40 CFR 60.4207, 40 CFR 80.510(b), PTC No. P-2012.0029, 8/23/2012]

MRRR - (Permit Condition 10.7) – NSPS 40 CFR 60, Subpart IIII – Engine Replacement pertains to all emergency diesel generators in this Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart IIII

If the permittee decides to change out/replace the IC engines, the permittee shall meet the engine replacement requirements of 40 CFR 60.4208 at that time.

[40 CFR 60.4205, 40 CFR 60.4206]

MRRR - (Permit Condition 10.8) – NSPS 40 CFR 60, Subpart IIII – Notification, Report, and Records pertains to all emergency diesel generators in this Emissions Unit Group 7: Emergency Diesel Generator Engines Subject to 40 CFR 60 Subpart IIII

The permittee is not required to submit an initial notification as required in 40 CFR 60.7(a)(1) for the emergency generator engines, in accordance with 40 CFR 60.4214(b).

If an emergency generator engine is equipped with a diesel particulate filter, the permittee shall keep records of any corrective action taken after the backpressure monitor has notified the permittee that the

high backpressure limit of the engine is approached, in accordance with 40 CFR 60.4214(c).  
[40 CFR 60.4205, 40 CFR 60.4206]

The permittee shall comply with Table 8 to Subpart III of Part 60-Applicability of General Provisions to Subpart III.  
[40 CFR 60.4218]

**MRRR – (Permit Condition 10.9) - Operation and Maintenance Recordkeeping**

The permittee shall maintain records of the operation and maintenance of the IC engine to demonstrate compliance with the Operation and Maintenance Requirement permit condition.  
[PTC No. P-2012.0029, 8/23/2012]

**MRRR – (Permit Condition 10.10) - SO<sub>2</sub> and NO<sub>x</sub> Emission Calculations** pertains only to the two Building 6000 (Hospital) emergency generator engines

The permittee shall calculate and record the emissions of SO<sub>2</sub> and NO<sub>x</sub> per consecutive 12-month period from the two generator engines using appropriate EPA AP-42 or manufactured supplied emission factors, or a DEQ approved alternative method. All records shall be maintained in accordance with Facility-wide Permit Condition 3.25.

[IDAPA 58.01.01.322.06, 07, 5/1/1994]

### **6.3 General Provisions**

Unless expressly stated, there are no MRRR for the general provisions.

#### **General Compliance, Duty to Comply**

The permittee must comply with the terms and conditions of the permit.  
[IDAPA 58.01.01.322.15.a, 5/1/1994; 40 CFR 70.6(a)(6)(i)]

#### **General Compliance, Need to Halt or Reduce Activity Not a Defense**

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.  
[IDAPA 58.01.01.322.15.b, 5/1/1994; 40 CFR 70.6(a)(6)(ii)]

#### **General Compliance, Duty to Supplement or Correct Application**

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.  
[IDAPA 58.01.01.315.01, 5/1/1994; 40 CFR 70.5(b)]

#### **Reopening, Additional Requirements, Material Mistakes, Etc.**

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.  
[IDAPA 58.01.01.322.15.c, 5/1/1994; IDAPA 58.01.01.386, 3/19/1999; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

#### **Reopening, Permitting Actions**

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.  
[IDAPA 58.01.01.322.15.d, 5/1/1994; 40 CFR 70.6(a)(6)(iii)]

## **Property Rights**

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/1994; 40 CFR 70.6(a)(6)(iv)]

## **Information Requests**

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/2000; IDAPA 58.01.01.322.15.f, 4/5/2000; 40 CFR 70.6(a)(6)(v)]

## **Information Requests, Confidential Business Information**

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/1994; IDAPA 58.01.01.128, 4/5/2000; 40 CFR 70.6(a)(6)(v)]

## **Severability**

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/1994; 40 CFR 70.6(a)(5)]

## **Changes Requiring Permit Revision or Notice**

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/2008; IDAPA 58.01.01.322.15.i, 3/19/1999; IDAPA 58.01.01.380-386, 7/1/2002; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/2002; IDAPA 58.01.01.209.05, 4/11/2006; 40 CFR 70.4(b)(14) and (15)]

## **Federal and State Enforceability**

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/1994; IDAPA 58.01.01.322.15.k, 3/23/1998; Idaho Code §39-108; 40 CFR 70.6(b)(1), (2)]

## **Inspection and Entry**

Upon presentation of credentials, the facility shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;

- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/1994; 40 CFR 70.6(c)(2)]

### **New Applicable Requirements**

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/2000; IDAPA 58.01.01.314.10.a.ii, 5/1/1994; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

### **Fees**

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/2003; 40 CFR 70.6(a)(7)]

### **Certification**

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/1994; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

### **Renewal**

The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/2000; 40 CFR 70.5(a)(1)(iii)]

If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/1994; 40 CFR 70.7(b)]

### **Permit Shield**

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
  - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
  - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;

- The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
- The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/2000;  
IDAPA 58.01.01.322.15.m, 325.01, 5/1/1994; IDAPA 58.01.01.325.02, 3/19/1999;  
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/1999; 40 CFR 70.6(f)]

### **Compliance Schedule and Progress Reports**

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/2000; IDAPA 58.01.01.314.9, 5/1/1994; IDAPA 58.01.01.314.10, 4/5/2000;  
40 CFR 70.6(c)(3) and (4)]

### **Periodic Compliance Certification**

The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as specified.

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified; and
- All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/2005; 40 CFR 70.6(c)(5)(iii) as amended,  
62 Fed. Reg. 54900, 54946 (10/22/1997); 40 CFR 70.6(c)(5)(iv)]

### **False Statements**

The permittee may not make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/1998]

### **No Tampering**

The permittee may not render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/1998]

### **Semiannual Monitoring Reports.**

In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months as specified.

[IDAPA 58.01.01.322.15.q, 3/23/1998; IDAPA 58.01.01.322.08.c, 4/5/2000; 40 CFR 70.6(a)(3)(iii)]

## **Reporting Deviations and Excess Emissions**

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition.
- Emission control device does not meet a required operating condition.
- Observations or collected data that demonstrate noncompliance with an emissions standard.
- Failure to comply with a permit term that requires a report.

[IDAPA 58.01.01.322.15.q, 3/23/1998; IDAPA 58.01.01.135, 4/11/2006; 40 CFR 70.6(a)(3)(iii)]

## **Permit Revision Not Required, Emissions Trading**

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/2000; 40 CFR 70.6(a)(8)]

## **Emergency**

In accordance with IDAPA 58.01.01.332, an “emergency” as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/2000; 40 CFR 70.6(g)]

## **7. REGULATORY REVIEW**

### **7.1 Attainment Designation (40 CFR 81.313)**

The facility is located in Elmore County which is designated as attainment or unclassifiable for PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>2</sub>, SO<sub>x</sub>, and Ozone. Reference 40 CFR 81.313.

### **7.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)**

The facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for NO<sub>x</sub> as demonstrated previously in the Emissions Inventory Section of this analysis. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10, and is subject to Tier I permitting requirements.

### **7.3 PSD Classification (40 CFR 52.21)**

The facility is not a major facility as defined by 40 CFR 52.21 because it does not emit or has the potential to emit any regulated air pollutants in amount greater than 250 tons per year. In addition, the facility is not a designated facility as defined in IDAPA 58.01.01.006.30. Therefore, this facility is not subject to Prevention of Significant Deterioration (PSD) permitting requirements.

### **7.4 NSPS Applicability (40 CFR 60)**

#### **40 CFR 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

The permittee shall comply with all applicable portions of 40 CFR 63, Subpart IIII, which are specified in Permit Conditions 10.1 through 10.12.

MHAFB used to operate four stationary spark ignition internal combustion engines on the flight line. The four barrier flight line engines were permitted under (PTC No. P-060048 issued May, 14, 2007), and each had a rated output capacity of 65.9 horsepower. They were switched to four Deutz Model 49 hp diesel-fired engines and were granted a permit to construct exemption on 9/2/15 which are now regulated under Subpart III.

Exemption documentation shall be maintained on site which shall identify the exemption determined to apply to the source and verify that the source qualifies for the identified exemption. The records and documentation shall be kept for a period of time not less than five (5) years from the date the exemption determination has been made or for the life of the source for which the exemption has been determined to apply, whichever is greater, or until such time as a permit to construct or an operating permit is issued which covers the operation of the source. The owner or operator shall submit the documentation to DEQ upon request.

#### **MRRR**

The Tier I Permit Conditions 10.1 through 10.12 include monitoring, reporting and recordkeeping requirements to ensure the facility demonstrates compliance with the applicable requirements of Subpart III.

The FRA documentation for Subpart III is contained in Appendix A of the T1-2012.0062 Proj 61117 “Statement of Basis” dated May 8, 2015.

#### **7.5 NESHAP Applicability (40 CFR 61)**

The facility is not subject to a NESHAP under Part 61 at the time of permit issuance.

#### **7.6 MACT Applicability (40 CFR 63)**

Because the facility has aerospace manufacturing and rework stations, many compression ignition IC engines powering electrical generators, and a gasoline dispensing facility (for vehicle refueling), the following NESHAP requirements apply to this facility:

- 40 CFR 63, Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities
- 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
- 40 CFR 63, Subpart CCCCCC - National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

#### **40 CFR 63, Subpart GG      National Emission Standards for Aerospace Manufacturing and Rework Facilities**

The Tier I Permit Condition 3.24 specifies the permittee shall submit an emission inventory of all hazardous air pollutants emitted by all affected stationary sources, as defined by 40 CFR 63.741.c, that are located in the contiguous area under the permittee’s common control. This emission inventory to include speciation of hazardous air pollutants must be submitted in accordance with Permit Condition 3.30, and shall be used to demonstrate compliance to maintain synthetic minor status regarding 40 CFR 63, Subpart GG.

#### **MRRR**

The Tier I Permit Condition 3.30 includes all periodic reports and certification requirements to ensure the MHAFB facility demonstrates compliance with the applicable requirements of Subpart GG.

#### **40 CFR 63, Subpart ZZZZ      National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

The permittee shall comply with all applicable portions of 40 CFR 63, Subpart ZZZZ, which are specified in Permit Conditions 3.32 through 3.45.

## **MRRR**

The Tier I Permit Conditions 3.32 through 3.45 includes monitoring, reporting and recordkeeping requirements to ensure the MHAFB facility demonstrates compliance with the applicable requirements of Subpart ZZZZ.

See Appendix A of the T1-2012.0062 Proj 61117 “Statement of Basis” dated May 8, 2015, for the Federal Requirements Applicability (FRA) form submitted by MHAFB.

### **40 CFR 63, Subpart CCCCCC                      National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities**

The permittee shall comply with all applicable portions of 40 CFR 63, Subpart CCCCCC, which are specified in Permit Conditions 3.46 through 3.55.

## **MRRR**

The Tier I Permit Conditions 3.46 through 3.55 includes monitoring, reporting and recordkeeping requirements to ensure the MHAFB facility demonstrates compliance with the applicable requirements of Subpart CCCCCC.

See Appendix B of the T1-2012.0062 Proj 61117 “Statement of Basis” dated May 8, 2015, for the Federal Requirements Applicability (FRA) form submitted by MHAFB.

## **7.7 CAM Applicability (40 CFR 64)**

Individual permit units at facilities that are subject to Title V permitting requirements (Tier I permits) may be subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). 40 CFR Part 64 requires CAM for units that meet the following three criteria:

- The unit must have an emission limit for the pollutant;
- The unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- The unit must have a pre-control potential to emit of greater than the major source thresholds.

MHAFB is not subject to CAM because no unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year.

## **7.8 Acid Rain Permit (40 CFR 72-75)**

MHAFB source is not an affected source subject to the Acid Rain Permit program in 40 CFR 72-75.

## **8. PUBLIC COMMENT**

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from July 29, 2020, to August 28, 2020. During this time, comments were not submitted in response to DEQ's proposed action.

## **9. EPA REVIEW OF PROPOSED PERMIT**

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on September 1, 2020, via the online the Electronic Permit System (EPS). On October 1, 2020, EPA responded that the permit was not reviewed and EPA has no objection to issuance.

## **Appendix A - Emissions Inventory**

Table 4.2-1

**Facility Wide Potential to Emit Emission Inventory**

Emission Source	Type	PM <sub>10</sub> (tpy)	PM <sub>2.5</sub> (tpy)	NO <sub>x</sub> (tpy)	SO <sub>2</sub> (tpy)	CO (tpy)	VOC (tpy)	HAPs (tpy)	ODS (tpy)
Jet Engine Testing	Point	4.0	4.0	85	1.5	63	13	0.46	
Aircraft Surface Coating Spray Booth	Point	0.078	0.078	-	-	-	0.015	0.023	
Aircraft Parts Surface Coating Spray Booth	Point	0.044	0.044	-	-	-	0.009	0.025	
Flight Line Area Spray Painting)	Point	0.003	0.003	-	-	-	1.5	0.002	
Vehicle Spray Paint Booth	Point	-	-	-	-	-	4.0	0.0004	
Bead-blasting Unit (Cr *6 Permitted)	Point	0.002	0.002	-	-	-	-	0.000002	
Turbine AGE	Fugitive	0.0562	0.0547	0.486	0.0817	1.462	0.0720	-	
Fire Training	Point	1.02	1.02	0.05	0.04	1.64	3.06	0.0462	
Ordinance Disposal (Munitions)	Fugitive	0.01	0.01	0.03	-	0.50	-	0.0134	
Internal Combustion Sources	Point	0.60	0.60	9.89	0.51	2.57	0.67	0.0315	
Insignificant Activities - Fuel Dispensing	Point	-	-	-	-	-	0.79	0.0228	
Insignificant Activities - Fuel Loading	Point	-	-	-	-	-	1.42	0.0823	
Insignificant Activities - Aboveground Storage Tanks (ASTs)	Point	-	-	-	-	-	9.93	0.409	
Insignificant Activities - External Combustion Sources	Point	1.32	1.32	14.61	0.10	14.60	0.96	0.459	
Insignificant Activities - Welding/Soldering/Cutting	Fugitive	0.15	0.15	-	-	-	-	0.0526	
Insignificant Activities - Woodworking	Fugitive	0.000811	0.000811	-	-	-	-	-	
Insignificant Activities - Miscellaneous Chemicals	Fugitive	-	-	-	-	-	5.23	0.477	
Insignificant Activities – Degreasing/Solvent Cleaning	Fugitive	-	-	-	-	-	2.30	-	
Insignificant Activities – Open Burn/Open Detonation	Fugitive	0.005	0.002	0.001	0.000005	0.002	0.000072	0.00150	
Insignificant Activities - Roads	Fugitive	25.183	2.605	-	-	-	-	-	
Insignificant Activities – Spills/Release	Fugitive	-	-	-	-	-	0.696	0.0195	
Insignificant Activities – Underground Storage Tank (UST)	Fugitive	-	-	-	-	-	0.01	0.0006	
<b>Total</b>		<b>32.47</b>	<b>9.89</b>	<b><u>110.07</u></b>	<b>0.73</b>	<b>83.77</b>	<b>43.66</b>	<b>2.13</b>	<b>0.08</b>

Table 4.2-2

**Actual Emission Estimates Summary for Calendar Year 2018**

Emission Source	Type	PM <sub>10</sub> (tpy)	PM <sub>2.5</sub> (tpy)	NO <sub>x</sub> (tpy)	SO <sub>2</sub> (tpy)	CO (tpy)	VOC (tpy)	HAPs (tpy)	ODS (tpy)
Jet Engine Testing	Point	0.315	0.273	5.956	0.390	5.108	2.148	-	
Aircraft Surface Coating Spray Booth	Point	0.00425	0.00409	-	-	-	0.0763	0.00124	
Aircraft Parts Surface Coating Spray Booth	Point	0.003026	0.002915	-	-	-	0.1008	0.00044	
Flight Line Area Spray Painting	Point	-	-	-	-	-	-	-	
Vehicle Spray Paint Booth	Point	-	-	-	-	-	0.000881	0.000247	
Bead-blasting Unit (Cr +6 Permitted)	Point	0.00198	0.00182	-	-	-	-	0.000002	
Turbine AGE	Fugitive	0.0562	0.0547	0.486	0.0817	1.462	0.0720	-	
Fire Training	Point	1.0185	1.0185	0.0541	0.0354	1.612	3.054	0.036	
Ordinance Disposal (Munitions)	Fugitive	0.0130	0.009	0.0264	-	0.498	-	0.0098	
Internal Combustion Sources	Point	0.070	0.070	1.105	0.066	0.317	0.075	0.000875	
Insignificant Activities - Fuel Dispensing	Point	-	-	-	-	-	0.049	0.00142	
Insignificant Activities - Fuel Loading	Point	-	-	-	-	-	1.229	0.0714	
Insignificant Activities - Aboveground Storage Tanks (ASTs)	Point	-	-	-	-	-	1.255	0.1043	
Insignificant Activities - External Combustion Sources	Point	0.727	0.727	6.751	0.0573	8.034	0.527	0.0126	
Insignificant Activities - Welding/Soldering/Cutting	Fugitive	0.00459	0.00459	-	-	-	-	0.00166	
Insignificant Activities - Woodworking	Fugitive	0.000326	0.000326	-	-	-	-	-	
Insignificant Activities - Miscellaneous Chemicals	Fugitive	-	-	-	-	-	0.448	0.145	
Insignificant Activities - Degreasing/Solvent Cleaning	Fugitive	-	-	-	-	-	1.995	-	
Insignificant Activities - Open Burn/Open Detonation	Fugitive	0.00422	0.001985	0.000502	0.000005	0.00112	0.000067	0.001173	
Insignificant Activities - Roads	Fugitive	25.183	2.605	-	-	-	-	-	
Insignificant Activities - Spills/Release	Fugitive	-	-	-	-	-	0.696	0.0195	
Insignificant Activities - Underground Storage Tank (UST)	Fugitive	-	-	-	-	-	0.0057	0.00024	
<b>Total</b>		<b>27.40</b>	<b>4.77</b>	<b>14.38</b>	<b>0.63</b>	<b>17.03</b>	<b>11.73</b>	<b>0.41</b>	<b>0.08</b>

## **Appendix B - Facility Comments on Draft Permit**

**The following comments were received from the facility on the DRAFT permit on July 15, 2020 prior to the Public Comment period:**

Permit Condition 3.32: Table 3.4

**Facility Comment:** All fire pumps are AFFF, change FIRESTATION to AFFF for 197 engines.

**DEQ Response:** DEQ has recognized the typo and will correct it.

Revised Permit Condition 3.32: FIRESTATION was corrected to read AFFF.

Permit Condition 3.32: Table 3.4

**Facility Comment:** IC2316, Shop name is Dining Facility.

**DEQ Response:** DEQ has recognized the typo and will correct it.

Revised Permit Condition 3.32: Dining Facility was added to the table.

Permit Conditions 3.40 – 3.45: These permit conditions pertain to non-emergency stationary spark ignition reciprocating internal combustion engines (SI RICE).

**Facility Comment:** MHAFFB no longer operates any stationary SI RICE. Recommend removing this portion of the permit if possible.

**DEQ Response:** DEQ has reviewed your application received October 29, 2019. The supporting documentation indicates that MHAFFB no longer operates any SI RICE. Consequently, DEQ will remove Permit Conditions 3.40 – 3.45 as requested.

Revised Permit Condition 3.40 – 3.45: These permit conditions are removed.

Permit Condition 3.47 and 3.48: 40 CFR 63, Subpart CCCCCC – Gasoline Throughput Limit and the affected sources.

**Facility Comment:** June 2018 monthly throughput exceeded 10,000 gals. IAW 40 CFR 63.11111, service station must now comply with 63.11116 and 63.11117.

**DEQ Response:** DEQ recognizes the throughput exceeded 10,000 gals in June 2018 and will revise the permit condition accordingly.

Revised Permit Condition 3.47 and 3.48 have become 3:41 and 3:42:

Revised Permit Condition 3.41: In accordance with 40 CFR 63.11111, for compliance with NESHAP Subpart CCCCCC, gasoline throughput from the gasoline storage tank shall not exceed 100,000 gallons per month.

Revised Permit Condition 3.42: In accordance with 40 CFR 63.11116(a), the permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

- Minimize gasoline spills;
- Clean up spills as expeditiously as practicable;
- Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
- Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

In accordance with 40 CFR 63.11117(b), the permittee must only load gasoline into storage tanks at the facility by utilizing submerged filling, as defined in 40 CFR 63.11132, and the following:

---

- Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the tank;
- Submerged fill pipes installed after November 9, 2006 must be no more than 6 inches from the bottom of the tank;
- Submerged fill pipes not meeting the specification of the two statements above are allowed if the permittee can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by the Administrator's delegated representative during the course of a site visit; and
- Gasoline storage tanks with a capacity of less than 250 gallons are not required to comply with the submerged fill requirements in 40 CFR 63.11117(b), but must comply only with all of the requirements in 40 CFR 63.11116.

Permit Condition 8.6: Hours of Operation Recordkeeping - The permittee shall monitor and record the beat-blast unit hours of operation on a monthly and annual basis. A compilation of the most recent five years of records shall be maintained onsite and shall be made available to DEQ representatives upon request.

**Facility Comment:** beat-blast should be bead-blast

**DEQ Response:** DEQ has recognized the typo and will correct it.

Revised Permit Condition 8.6: Hours of Operation Recordkeeping - The permittee shall monitor and record the bead-blast unit hours of operation on a monthly and annual basis. A compilation of the most recent five years of records shall be maintained onsite and shall be made available to DEQ representatives upon request.

Permit Condition Table 10.1: Row – Building 2316...

**Facility Comment:** Building 2316 generator was manufactured in 1999: therefore is ZZZZ and captured in Table 3.4. Please remove from Table 10.1.

**DEQ Response:** DEQ has recognized the typo and will remove the error.

Revised Permit Condition Table 10.1: Row – Building 2316... was removed from Table 10.1.

Permit Condition Table 10.2: Row – 10.4 Fuel Sulfur...

**Facility Comment:** Fuel Sulfur content is permit condition 10.6 not 10.4.

**DEQ Response:** DEQ has recognized the typo and will correct the error.

Revised Permit Condition Table 10.2: Row – 10.6 Fuel Sulfur...

Permit Condition 10.9: Sulfur Content Monitoring – Two Building 6000 (Hospital) Emergency Generator Engines...

**Facility Comment:** Is this sulfur content monitoring statement necessary given the information already included under "Facility Wide Conditions" pg. 10 para 3.17?

**DEQ Response:** DEQ acknowledges the sulfur content monitoring statement is included in the "Facility Wide Conditions" and will remove Permit Condition 10.9.

Revised Permit Condition 10.9: Old Permit Condition is removed.

Permit Condition 10.10: Operation and Maintenance Recordkeeping – Two Building 6000 (Hospital) Emergency Generator Engines...

**Facility Comment:** Wouldn't the record keeping requirement apply to all IIII engines? If so, no need to specifically call out hospital generators.

**DEQ Response:** DEQ acknowledges the record keeping requirements apply to all IIII engines . Therefore the two building 6000 (Hospital) Emergency Generator Engines wording will be removed. Permit Condition 10.10 will be replaced with 10.9.

Revised Permit Condition 10.9: Operation and Maintenance Recordkeeping – The permittee shall maintain records of the operation and maintenance of the IC engines to demonstrate compliance with the Operation and Maintenance Requirement permit condition.