



# **COMMONWEALTH of VIRGINIA**

*DEPARTMENT OF ENVIRONMENTAL QUALITY*  
TIDEWATER REGIONAL OFFICE

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## **STATEMENT OF LEGAL AND FACTUAL BASIS** **Significant Permit Modification**

Norfolk Naval Shipyard  
Portsmouth, Virginia  
TRO-60326

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Norfolk Naval Shipyard has applied for a Significant Modification to the Title V Operating Permit for its facility in Portsmouth, Virginia. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Permit Writer/Contact:

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Date: May 12, 2015

Regional Air Permits  
Manager:

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Troy D. Breathwaite

Date: May 11, 2015

Regional Director:

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Maria R. Nold

Date: May 12, 2015

## I. Facility Information - Shipyard

### Permittee:

Norfolk Naval Shipyard  
Portsmouth, VA 23709-5000

### Responsible Official:

Mr. Jesse Alspaugh  
Director of Occupational, Safety, Health and Environmental Division  
by Direction of the Shipyard Commander

### Facility

Norfolk Naval Shipyard  
Portsmouth, VA 23709-5000

### Contact Person:

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**County-Plant Identification Number:** 51-740-00006

**Facility Description:** NAICS 928110 and 336611 - NNSY is one of four NAVY shipyards in the United States. The facility occupies 810.25 acres and employs approximately 7,000 people. NNSY has the capability to dry-dock any NAVY vessel including nuclear and non-nuclear powered carriers and submarines. There are five operable dry-docks located at NNSY and multiple ships and piers. Various activities are conducted in support of repair and overhaul operations including, but not limited to: blasting, painting, welding, electroplating, utility steam production, machining and crane loading. Many of these activities are conducted in large buildings and shops located in the industrial area of the yard. Shipboard equipment and machinery is often removed from a dry-docked vessel by overhead crane, and is taken to various shops within the shipyard for repair or overhaul after which they are returned to the ship for re-installation. Power to the facility is supplied by way of steam from Wheelabrator and the electrical grid. The facility also has some large generators onsite to supply power to the grid when necessary. The following North American Industry Classification System (NAICS) codes apply to the operations at NNSY:

- 928110 (9711) - National security
- 336611 (3731) - Shipbuilding and repairing

The Southgate Annex, which is located next to NNSY, is owned and operated by the Commander, Navy Region Mid-Atlantic (CNRMA). Emission units for this area are listed in the CNRMA section of the permit. New Gosport, Stanley Court and Scott Center are not considered part of this facility for Title V purposes.

The facility is a Title V major source for all criteria pollutants. It is also a major source of HAPs and is therefore, subject to the Shipbuilding MACT (Subpart II), the Chrome MACT (Subpart N), the RICE MACT (Subpart ZZZZ), the CI ICE NSPS (Subpart IIII) and the Asbestos NESHAP (Subpart M). This source is located in an attainment area for ozone and in an attainment area for all other pollutants, and is a PSD major source because of its relationship with Wheelabrator Portsmouth, Inc. Wheelabrator Portsmouth Inc. is a support facility for NNSY by supplying steam to the shipyard. The facility is currently permitted under a Minor NSR Permit issued on February 24, 2014.

This permit action is to increase the throughput of blast media and the types of blast media used in the training blast booth PNTS-B172-034. The changes were incorporated into their minor NSR permit dated February 23, 2015. We are also removing 1 unit from the degreasing section of the plant because the unit has been removed (DEGS-B59-015)

and 2 units from the insignificant emissions unit list because it turns out these are electric units (FURN-006 and 046) not fuel burning emission units.

## **II. COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, has been conducted (9/23/13). In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

## **III. REQUESTED MODIFICATION AND REASON FOR MODIFICATION**

The source has submitted an application for a significant permit modification to increase the throughput of blast media and the types of blast media used in the training blast booth PNTS-B173-034. These changes will incorporate the changes made to their minor NSR permit issued on February 23, 2015. There are also 3 other units that are being removed from the permit: 1 emission unit from the degreasing section of the plant (DEGS-B59-015) which has been removed from the facility and 2 emission units in the insignificant emissions unit list (FURN-006 and 046) which it turns out are run by electricity, not their own fuel.

## **IV. APPLICABILITY OF 9VAC5-80-230**

This permit modification involves the addition of new significant emission units that required a modification to their minor NSR permit. The modification to the minor NSR permit did require a case-by-case determination; therefore, this permit will be processed using the significant modification procedures outlined in 9VAC5-80-230.

## **V. CHANGES TO TITLE V OPERATING PERMIT**

### Section I

- Changed the underlying minor NSR issuance date.
- Added a description of this permit action to the last paragraph of the facility description.

### Section II (Emission Units):

- Changed the underlying minor NSR permit date.
- Degreasers - Removed DEGS-B59-015 from the emission unit list because it has been removed from the facility.
- Insignificant emissions unit list - Removed FURN-006 and 046 because they are not fuel burning equipment, they run on electricity.

### Section III (Internal Combustion Units -

- Changed the underlying minor NSR date in each applicable condition.

### Section IV (Abrasive blasting Operations) -

- Changed Condition 23 to reflect the newly approved blast media allowed to be used in the training blast booth.
- Changed the underlying minor NSR date in each applicable condition.
- Changed Condition 30 to reflect the new throughput limit for the blast media in the training blast booth.
- Changed condition 31 to reflect the emission limits from the increased throughput from all the blast booths.
- Changed Condition 34 to include the dry docks for the semi-annual VEE to match what is in the minor NSR permit.
- Changed condition 38C to say "approved blast media" instead of listing out all the approved blast media.

Section VI (Degreasing Operations)

- Removed (DEGS-B59-015 from the list of emission units associated with this section of the permit.

Section VII (Electroplating Operations)

- Changed the underlying minor NSR date in each applicable condition.

Section VIII (Coating Operations)

- Changed the underlying minor NSR date in each applicable condition.

Section X (Insignificant Emissions Units):

- Removed FURN-006 and 046 from the list because they are not fuel burning equipment. They operate using electricity and are therefore not emission points.

Section XV (Facility - Wide Conditions - Shipyard and CNRMA)

- Changed the underlying minor NSR date in each applicable condition.

## **VI. PUBLIC PARTICIPATION**

The proposed permit will be placed on public notice in the Virginian-Pilot from Wednesday, March 25, 2015 to Friday, April 24, 2015.