



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE

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COMMONWEALTH OF VIRGINIA Department of Environmental Quality Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Joint Expeditionary Base Little Creek
Virginia Beach, Virginia
Permit No. TRO-60033

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 9VAC5 Chapter 80, Joint Expeditionary Base Little Creek has applied for a Title V Operating Permit for its Virginia Beach, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Air Permit Writer/Contact: _____
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Date: March 22, 2016

Regional Air Permits
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Maria R. Nold

Date: March 22, 2016

Regional Director: _____
Maria R. Nold

Date: March 22, 2016

I. FACILITY INFORMATION

Permittee

U.S. Department of the Navy

Responsible Official

John H. Chamberlayne
Director, Environmental Compliance
Commander Navy Region Mid-Atlantic

Facility

Joint Expeditionary Base Little Creek
1450 Gator Boulevard
Virginia Beach, Virginia 23521

Contact Person

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County-Plant Identification Number: 51-710-00013

SOURCE DESCRIPTION

NAICS Codes: 928110 - National Security
336611 - Shipbuilding and repairing

The facility is a multi-disciplined United States Navy base that provides on-base facilities and services for the administrative and logistical support of operating forces, resident commands, organizations, home-ported ships, and other Navy and allied units. No products are manufactured at the facility. Various activities and operations are conducted to support the overhaul and repair activities for Navy vehicles, marine vessels, equipment, and buildings. In addition, the base is used as a training facility for the Atlantic fleet.

The facility is a Title V major source of SO₂, NO_x, CO, VOC, and HAP. This source is located in an attainment area for all pollutants, and is a PSD-size source. The facility is currently permitted under a State Operating Permit issued on November 9, 2015.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on September 3, 2014. 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 been found to be out of compliance with NSPS Subparts IIII and JJJJ, MACT Subpart ZZZZ, and 40 CFR 82, Subpart F (Protection of Stratospheric Ozone: Recycling and Emissions Reduction).. A detailed Compliance Plan is included in Section X of the Title V permit for these federal requirements.

II. EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emission units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Abrasive Blasting Operations							
Grit media blasting operation (ABRA-GRP1)							
ABRA-CB125-012	STABRA-CB125-001 & STABRA-CB125-002	Causeway Blasting Booth in bldg CB-125. Installed in 1992.	22,500 lb/hr	Dustrex baghouses. Installed in 1992.	CDABRA-CB125-001 & CDABRA-CB125-002	PM/PM-10	11/09/15 SOP
ABRA-CB125-023	STABRA-CB125-003 & STABRA-CB125-004	Causeway Blasting Booth in bldg CB-125. Installed in 1992.	22,500 lb/hr	Dustrex baghouses. Installed in 1992.	CDABRA-CB125-003 & CDABRA-CB125-004	PM/PM-10	11/09/15 SOP
Aluminum oxide/sponge media blasting operation							
ABRA-3816A-003	STABRA-3816A-003	Indoor abrasive blasting operation for the Landing Craft Air Cushion (LCAC) Service Life Extension Program (SLEP) in bldg 3816A. Installed in 2008.	180 lb/hr	Fabric filter. Installed in 2008.	CDABRA-3816A-003	PM/PM-10	3/4/08 Exemption Letter
Boilers							
Group I boilers (BOIL-GRP1)							
BOIL-777-001	STBOIL-777-001	Nebraska oil/natural gas-fired boiler, model NS-ES-58 in bldg 777. Installed in 2005.	76.2 MMBtu/hr	Low NOx burner and flue gas re-circulation system	CDBOIL-777-001	NOx	11/09/15 SOP
BOIL-777-002	STBOIL-777-002	Nebraska oil/natural gas-fired boiler, model NS-ES-58 in bldg 777. Installed in 2005.	80.0 MMBtu/hr	Low NOx burner and flue gas re-circulation system	CDBOIL-777-002	NOx	11/09/15 SOP
BOIL-777-003	STBOIL-777-003	Nebraska oil/natural gas-fired boiler, model NS-ES-58 in bldg 777. Installed in 2005.	75.6 MMBtu/hr	Low NOx burner and flue gas re-circulation system	CDBOIL-777-003	NOx	11/09/15 SOP
BOIL-777-004	STBOIL-777-004	Nebraska oil/natural gas-fired boiler, model NS-ES-58 in bldg 777. Installed in 2005.	75.6 MMBtu/hr	Low NOx burner and flue gas re-circulation system	CDBOIL-777-004	NOx	11/09/15 SOP

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Group II boiler (BOIL-GRP2)							
BOIL-3511-007	STBOIL-3511-007	Distillate oil-fired boiler in bldg 3511. Installed after 1972.	0.3548 MMBTU/hr	-	-	-	-
Group III boilers (BOIL-GRP3)							
BOIL-1602-009, BOIL-1602-010, BOIL-3445-011, BOIL-3445-012, BOIL-3049A-013, BOIL-3049A-014, BOIL-3056-021, BOIL-3129-022, BOIL-3147-023 BOIL-3363-024, BOIL-3364-025, BOIL-3408-026, BOIL-3430-027, BOIL-3445-028, BOIL-3505-029, BOIL-3690-030, BOIL-3854-031	STBOIL-1602-009, STBOIL-1602-010, STBOIL-3445-011, STBOIL-3445-012, STBOIL-3049A-013, STBOIL-3049A-014, STBOIL-3056-021, STBOIL-3129-022, STBOIL-3147-023 STBOIL-3363-024, STBOIL-3364-025, STBOIL-3408-026, STBOIL-3430-027, STBOIL-3445-028, STBOIL-3505-029, STBOIL-3690-030, STBOIL-3854-031	Natural gas-fired boilers. Installed after 1972.	Each < 10 MMBtu/hr	-	-	-	-
Group IV Boilers (BOIL-GRP4)							
OCOM-CB301-025 & OCOM-CB301-026	STOCOM-CB301-025 & STOCOM-CB301-026	Used oil-fired boilers. Installed after 1972.	Each 0.185 MMBtu/hr	-	-	-	-
Engines/Generators							
ICGF-108-001	STICGF-108-001	John Deere 4045TF diesel emergency generator. Manufactured 2001.	40 kW	-	-	-	-

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ICGF-115-058	STICGF-115-058	Perkins CM51035 diesel emergency generator in bldg 115. Manufactured 2004.	20 kW 27 HP	-	-	-	-
ICGF-123-001	STICGF-123-001	PSI A030T740 natural gas emergency generator. Manufactured 2010.	150 kW	-	-	-	-
ICGF-752-036	STICGF-752-036	Caterpillar 3406B_D1 diesel emergency generator in bldg 752. Manufactured 1991.	250 kW 335 HP	-	-	-	-
ICGF-773-039	STICGF-773-039	Caterpillar diesel emergency generator in bldg 773. Manufactured 1994.	1600 kW 2146 HP	N/A	N/A	N/A	11/09/15 SOP
ICGF-774-040	STICGF-774-040	Caterpillar diesel emergency generator in bldg 774. Manufactured 1994.	1600 kW 2146 HP	N/A	N/A	N/A	11/09/15 SOP
ICGF-777-037	STICGF-777-037	Caterpillar diesel emergency generator in bldg 777. Manufactured 1987.	725 kW 1220 HP	-	-	-	11/09/15 SOP
ICGF-1126-042	STICGF-1126-042	John Deere 6068HF485 diesel emergency generator in bldg 1126. Manufactured 2013.	180 kW 241 HP	-	-	-	-
ICGF-1166-043	STICGF-1166-043	Olympian 1006GTG diesel emergency generator in bldg 1166. Manufactured 2005. Installed 10/24/2005.	100 kW 134 HP	-	-	-	-
ICGF-1265-049	STICGF-1265-049	Caterpillar 3456 diesel emergency generator in bldg 1265. Manufactured 2006.	600 kW 805 HP	-	-	-	11/09/15 SOP
ICGF-1265-053	STICGF-1265-053	Caterpillar 3412 diesel emergency generator in bldg 1265. Manufactured 2005.	500 kW 671 HP	-	-	-	11/09/15 SOP

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
ICGF-1265-059	STICGF-1265-059	Caterpillar 3456 diesel emergency generator in bldg 1265. Manufactured 2005.	500 kW 671 HP	-	-	-	11/09/15 SOP
OCOM-1501-012	STICGF-1501-012	Caterpillar 3208 diesel emergency generator in bldg 1501. Installed before August 1981.	75 kW 101 HP	-	-	-	-
OCOM-1518-017	STICGF-1518-017	Perkins diesel emergency generator in bldg 1518. Manufactured 2001.	150 kW 201 HP	-	-	-	-
ICGF-1522-001	ST ICGF-1522-001	Onan diesel emergency generator in bldg 1522.	20 kW				
ICGF-1555-001	STICGF-1555-001	Perkins CM51035 diesel emergency generator in bldg 1555. Manufactured 2004.	20 kW 27 HP	-	-	-	-
ICGF-1558-001	STICGF-1558-001	Generac A3797 propane emergency generator. Manufactured 1998.	35 kW				
ICGF-1609-041	STICGF-1609-041	Caterpillar 3056 diesel emergency generator in bldg 1609. Manufactured 1996.	100 kW 134 HP	-	-	-	-
ICGF-1618-001	STICGF-1618-001	Caterpillar 3306 diesel emergency generator in bldg 1618. Manufactured 2003.	300 kW 402 HP	-	-	-	-
ICGF-1625-001	STICGF-1625-001	Caterpillar 3454diesel emergency generator in bldg 1625. Manufactured 2010.	40 kW 54 HP	-	-	-	-
ICGF-2000-057	STICGF-2000-057	John Deere 6068TF250 diesel emergency generator in bldg 2000. Manufactured 2003.	125 kW 168 HP	-	-	-	-
ICGF-2083-063	STICGF-2083-063	Generac C2920 diesel emergency generator in bldg 2083. Manufactured 2000.	25 kW 34 HP	-	-	-	-

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ICGF-2115-001	STICGF-2115-001	John Deere 4045HF285 diesel emergency generator in bldg 2115. Manufactured 2010.	80 kW 107 HP	-	-	-	-
ICGF-3006-048	STICGF-3006-048	Perkins AG51040 diesel emergency generator in bldg 3006. Manufactured 2004.	30 kW 40 HP	-	-	-	-
ICGF-3075-060	STICGF-3075-060	Ford WSG1068 natural gas emergency generator in bldg 3075. Manufactured 2005. Installed after August 2005.	100 kW 134 HP	-	-	-	-
ICGF-3144-001	ST ICGF-3144-001	John Deere 5030HF285G diesel emergency generator. Manufactured 2012.	62 kW				
ICGF-3150-049	STICGF-3150-049	Caterpillar 3454 diesel emergency generator in bldg 3150. Manufactured 2008.	60 kW 81 HP	-	-	-	-
ICGF-3165-004	STICGF-3165-004	Caterpillar 3304 PC diesel emergency generator. Manufactured 1970.	75 kW 101 HP	-	-	-	-
ICGF-3293-066	STICGF-3293-066	Generac 70874 diesel emergency generator in bldg 3293. Manufactured 1989.	35 kW 47 HP	-	-	-	-
ICGF-3400-001	STICGF-3400-001	John Deere 4024TF281 diesel emergency generator in bldg 3400. Manufactured 2010.	30 kW 40 HP	-	-	-	-
ICGF-3445-067	STICGF-3445-067	Generac 74474 diesel emergency generator in bldg 3445. Manufactured 1992.	250 kW 335 HP	-	-	-	-
ICGF-3501-002	STICGF-3501-002	Olympian GM8.1 natural gas emergency generator. Manufactured 2008	150 kW				

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
ICGF-3504-001	STICGF-3504-001	GM 8.1LT natural gas emergency generator. Manufactured 2008	150 kW				
ICGF-3505-007	STICGF-3505-007	Caterpillar 3454 diesel emergency generator. Manufactured 2013.	100 kW 134 HP	-	-	-	-
ICGF-3505-008	STICGF-3505-008	Caterpillar 3454 diesel emergency generator. Manufactured 2013.	60 kW 81 HP	-	-	-	-
ICGF-3509-001	STICGF-3509-001	Caterpillar G3412 natural gas fired emergency generator in bldg 3509. Manufactured 2011.	515 kW 691 HP	-	-	-	-
ICGF-3520-001	ST ICGF-3520-001	John Deere 6068HF275 diesel emergency generator. Manufactured 2006	135 kW				
ICGF-3539-064	STICGF-3539-064	Caterpillar G3412 natural gas emergency generator in bldg 3539. Manufactured 2006.	450 kW 604 HP	-	-	-	-
ICGF-3708B-069	STICGF-3708B-069	Perkins 2643D640GF5 diesel emergency generator in bldg 3708B. Manufactured 2004. Installed 11/28/05.	100 kW 134 HP	-	-	-	-
ICGF-3808-065	STICGF-3808-065	Ford WSG1068 natural gas emergency generator in bldg 3808. Manufactured 2006. Installed 6/24/06.	75 kW 107 HP	-	-	-	-
ICGF-3823-032	STICGF-3823-032	Caterpillar 3408DI diesel emergency generator in bldg 3823. Manufactured 1986.	365 kW 551 HP	-	-	-	-
ICGF-3841-068	STICGF-3841-068	Ford WSG1068 natural gas emergency generator in bldg 3841. Manufactured 2006 (11/30/06).	75 kW 101 HP	-	-	-	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
ICGF-3842-001	STICGF-3842-001	Ford WSG1068 natural gas fired emergency generator. Manufactured 2005.	75 kW 101 HP				
ICGF-3848-033	STICGF-3848-033	John Deere 4039TF001 diesel emergency generator in bldg 3848. Manufactured 2004.	60 kW 81 HP	-	-	-	-
ICGF-3854-001	STICGF-3854-001	Caterpillar 3406 natural gas emergency generator in bldg 3854. Manufactured 1997.	160 kW 233 HP	-	-	-	-
ICGF-3854-002	STICGF-3854-002	Cummins GTA855G2 natural gas emergency generator in bldg 3854. Manufactured 2006.	215 kW 336 HP	-	-	-	-
OCOM-3872-010	STOCOM-3872-010	One diesel training engine in bldg 3872. Manufactured 1999.	190 HP	-	-	-	11/09/15 SOP
OCOM-3872-011	STOCOM-3872-011	One diesel training engine in bldg 3872. Manufactured 1999.	190 HP	-	-	-	11/09/15 SOP
OCOM-3872-019	STOCOM-3872-019	One diesel training engine in bldg 3872. Manufactured 1999.	75 HP	-	-	-	11/09/15 SOP
OCOM-3872-020	STOCOM-3872-020	One diesel training engine in bldg 3872. Manufactured 1999.	135 HP	-	-	-	11/09/15 SOP
OCOM-3879-023	STICGF-3879-023	Onan diesel emergency generator in bldg 3879. Manufactured 1976.	100 kW 134 HP	-	-	-	-
ICGF-3889-001	STICGF-3889-001	Ford WSG1068 natural gas fired emergency generator. Manufactured 2006.	75 kW 101 HP				
ICGF-3889-002	STICGF-3889-002	Generac E133MSN320A1 natural gas fired emergency generator. Manufactured 2012.	250 kW				

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
ICGF-3892-001	STICGF-3892-001	John Deere diesel emergency generator in bldg 3892. Manufactured 2005.	125 kW 168 HP	-	-	-	-
OCOM-5000-024	STICGF-5000-024	Cummins 4BT3.9-G2 diesel emergency generator in bldg 5000. Manufactured 1995.	55 kW 74 HP	-	-	-	-
ICGF-5326-001	STICGF-5326-001	Generac natural gas fired emergency generator. Manufactured 2010.	27 kW				
ICGF MAGAZINE-056	STICGF-MAGAZINE-056	Perkins AG51040 diesel emergency generator. Manufactured 2003.	30 kW 40 HP				
ICGF-PIER35-054	STICGF-PIER35-054	Olympian diesel emergency generator D40P31 at Pier 35. Manufactured 2004.	40 kW 54 HP	-	-	-	-
ICGF-L3-Triton	STICGF-L3-Triton	One diesel non-emergency generator (contractor owned). Manufactured 2007.	1000 kW 1350 HP	N/A	N/A	N/A	11/09/15 SOP
ICGF-L3-MTU	STICGF-L3-MTU	One diesel non-emergency generator (contractor owned). Manufactured 2011.	550 kW 815 HP	N/A	N/A	N/A	11/09/15 SOP
ICGF-L3-WACKER	STICGF-L3-WACKER	One diesel non-emergency generator (contractor owned). Manufactured 2006.	125 kW 150 HP	N/A	N/A	N/A	11/09/15 SOP
ICGF-Oceaneering-WACKER	STICGF-Oceaneering-WACKER	One diesel non-emergency generator (contractor owned). Manufactured 2007.	38 kW 67 HP	N/A	N/A	N/A	11/09/15 SOP
ICGF-Oceaneering-GENERAC	STICGF-Oceaneering-GENERAC	One diesel non-emergency generator (contractor owned). Manufactured 2015.	60 kW 92 HP	N/A	N/A	N/A	11/09/15 SOP

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
ICGF-Oceaneering-GENERAC	STICGF-Oceaneering-GENERAC	One diesel non-emergency generator (contractor owned). Manufactured 2015.	60 kW	N/A	N/A	N/A	11/09/15 SOP
Firing Ranges							
FIRI-3817-001	STFIRI-3817-001	Indoor firing range in bldg 3817. Installed in 1992.	750 rounds/hr	Particulate filter. Installed in 1992.	CDFIRI-3817-001	PM/PM-10, Lead	11/09/15 SOP
FIRI-3638-002	STFIRI-3638-002	Indoor firing range in bldg 3638. Installed in 2005.	4400 rounds/hr	Particulate filter. Installed in 2005.	CDFIRI-3638-002	PM/PM-10, Lead	11/09/15 SOP
Gasoline Operations							
PETO-3838-001A	ASPETO-3838-001A	Gasoline loading rack and associated storage tank in the fuel farm. Installed pre-1972.	Operates at less than 4,000 gal/day	-	-	-	-
GSTA-GRP2							
GSTA-1612-003	ASGSTA-1612-003	Gasoline dispensing facility and associated storage tanks: GSTA-1612-003 at bldg 1612 (WCITGO) w/ tanks TNKU-1612-019, 020 & 021. Installed after 1972.	GSTA-1612-003 with four pumps. TNKU-1612-019, 020 & 021 - 10,000 gallons each	All tanks with Stage 1 Vapor Recovery	Stage 1	VOC/HAPS	N/A

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
GSTA-3093-001	ASGSTA-3093-001	Gasoline dispensing facility and associated storage tanks: GSTA-3093-001 at bldg 3093 (ECITGO) w/ tanks TNKU-3093-001, 002 & 003. Installed after 1972.	GSTA-3093-001 with 12 pumps. TNKU-3093-001, 002 & 003 - 12,000 gallons each	All tanks with Stage 1 Vapor Recovery	Stage 1	VOC/HAPS	N/A
GSTA-3836A-006	ASGSTA-3836A-006	Gasoline dispensing facility and associated storage tanks: GSTA-3836A-006 at bldg 3836 (NEX by fuel farm). Installed after 1972.	GSTA-3836A-006 with one pump.	All tanks with Stage 1 Vapor Recovery	Stage 1	VOC/HAPS	N/A
Painting Operations - Non-Shipbuilding/Ship Repair							
PNTS-GRP2							

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
PNT0-3816-007 PNT0-3511-008, PNT0-3514-009, PNT0-3874-010, PNT0-CB123-012, PNT0-3855-014, PNT0-3812-015, PNT0-3853-016, PNT0-1126-017, PNT0-CB315-018, PNT0-3869-019, PNT0-3896-020, PNTS-CB301-010, PNTS-1619-015, PNTS-3814-040, & PNTS-PORT OPS-041	ASPNT0-3816-007, ASPNT0-3511-008, ASPNT0-3514-009, ASPNT0-3874-010, ASPNT0-CB123-012, ASPNT0-3855-014, ASPNT0-3812-015, ASPNT0-3853-016, ASPNT0-1126-017, ASPNT0-CB315-018, ASPNT0-3869-019, ASPNT0-3896-020, ASPNTS-CB301-010, ASPNTS-1619-015, ASPNTS-3814-040, &ASPNTS-PORT OPS-041	Aerosol can spray paint activities	-	-	-	-	-
PNTS-GRP3							
PNT0-1131-003, PNT0-1522-004, PNT0-3165-005, PNT0-3226-006, PNT0-1619-050, PNT0-PORT OPS-051, & PNT0-3814-052	ASPNT0-1131-003, ASPNT0-1522-004, ASPNT0-3165-005, ASPNT0-3226-006, ASPNT0-1619-050, ASPNT0- PORT OPS-051, & ASPNT0-3814-052	Brush/roller painting activities	-	-	-	-	-
Painting Operations - Shipbuilding/Ship Repair							

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
PNTS-PIER SIDE							
PNTO-CONTRACTOR-020 & PNTO-SHIP FORCE-021	ASPNTO-CONTRACTOR-020 & ASPNTO-SHIP FORCE-021	Pier side ship painting activities	-	-	-	-	-
PNTS-SHIP							
PNTO-3816-002, PNTO-1263-011, PNTO-3874-011, PNTO-3814-013, PNTO-3869-019, PNTO-1619-030, PNTO-BMU2-031, PNTO-PORT OPS-032, PNTO-CB124-033, PNTO-NSWG2-034, PNTO-SBT20-035, & PNTO-UCT1-036	ASPNTO-3816-002, ASPNTO-1263-011, ASPNTO-3874-011, ASPNTO-3814-013, ASPNTO-3869-019, ASPNTO-1619-030, ASPNTO-BMU2-031, ASPNTO-PORT OPS-032, ASPNTO-CB124-033, ASPNTO-NSWG2-034, ASPNTO-SBT20-035, & ASPNTO-UCT1-036	Ship painting activities	-	-	-	-	-
Painting Operations - Wood Finishing							
PNTS-WOOD							

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
PNTS-CB301-001, PNTS-1618-002, PNTS-1522-003, PNTS-3165-004, PNTS-3227-005, & PNTS-3530-006	ASPNTS-CB301-001, ASPNTS-1618-002, ASPNTS-1522-003, ASPNTS-3165-004, ASPNTS-3227-005, & ASPNTS-3530-006	Wood finishing activities	-	-	-	-	-
Woodworking Operations							
WOOD-GRP1							
WOOD-1618-008	STWOOD-1618-008	WOOD-1618-008 in bldg 1618. Installed pre-1972.	-	Fabric filters	CDWOOD-1618-008	PM/PM-10	-
WOOD-GRP2							
WOOD-1522-003, WOOD-3165-004, WOOD-3227-005, WOOD-117-006, WOOD-3530-009 & WOOD-3806-001	STWOOD-1522-003, STWOOD-3165-004, STWOOD-117-006, STWOOD-3530-009, & STWOOD-3806-001	WOOD-1522-003 in bldg 1522. Installed pre-1972. WOOD-3165-004 in bldg 3175. Installed pre-1972. WOOD-117-006 in bldg 117. Installed pre-1972. WOOD-3530-009 in bldg 3530. Installed pre-1972. WOOD-3806-001 in bldg 3806. Installed pre-1997.	-	Cyclones	CDWOOD-1522-003, CDWOOD-3165-004, CDWOOD-117-006, CDWOOD-3530-009, & CDWOOD-3806-001	PM/PM-10	-
Degreasing Operations - Non-Halogenated Cold Degreasers (DEGS-GRP1)							
DEGS-CB205-001	N/A	Solvent Degreasing in bldg CB-205. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-CB315-001	N/A	Solvent Degreasing in bldg CB-315. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-3817-018	N/A	Solvent Degreasing in bldg 3817. (solvent < 120°F)	< 10 gallons	-	-	-	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
DEGS-3511-021	N/A	Solvent Degreasing in bldg 3511. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-3514-024	N/A	Solvent Degreasing in bldg 3514. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-3859-025	N/A	Solvent Degreasing in bldg 3859. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-3165-031	N/A	Solvent Degreasing in bldg 3165. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-3810-032	N/A	Solvent Degreasing in bldg 3810. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-3615-044	N/A	Solvent Degreasing in bldg 3615. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-3615-045	N/A	Solvent Degreasing in bldg 3615. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-CB125-046	N/A	Solvent Degreasing in bldg CB-125. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-2632-001	N/A	Solvent Degreasing in bldg 2632. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-2632-002	N/A	Solvent Degreasing in bldg 2632. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-2632-003	N/A	Solvent Degreasing in bldg 2632. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-2632-004	N/A	Solvent Degreasing in bldg 2632. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-2632-005	N/A	Solvent Degreasing in bldg 2632. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-108-001	N/A	Solvent Degreasing in bldg 108. (solvent < 120°F)	< 10 gallons	-	-	-	-
DEGS-117-001	N/A	Solvent Degreasing in bldg 117. (solvent < 120°F)	< 10 gallons	-	-	-	-

Changes to the equipment list:

ABRA-3816A-024 has been re-named ABRA-3816A-003.

Group II boiler BOIL-3870-004 and woodworking operation WOOD-CB301-007 have been removed from the equipment list. These units have been removed from the facility. DEQ was informed of the removal of these units during an inspection on September 3, 2014.

Group II boiler BOIL-3511-007, the Group III boilers, and the Group IV boilers have been moved from the insignificant emission unit list. These units are now subject to MACT DDDDD (Major Source Boiler MACT).

The generator groupings (Group I, II, III, etc.) have been eliminated. These groupings were originally assigned to aid in the identification of the units when some of the units were significant and some were insignificant. All units are now subject to MACT ZZZZ and are, therefore, significant. Thus, the groupings are no longer necessary.

The manufacture dates for engines/generators ICGF-3015-003, ICGF-3505-007, ICGF-3505-008, ICGF-3823-032, ICGF-3848-033, ICGF-1126-042, ICGF-2083-063, ICGF-3293-066, OCOM-2115-021, OCOM-3400-022, OCOM-3879-023, OCOM-3872-010, OCOM-3872-011, OCOM-3872-019, OCOM-3872-020, ICGF-777-037, ICGF-1265-049, ICGF-1265-053, and ICGF-1265-059 have been updated. These units have been replaced over the years.

The classification of the engines/generators ICGF-773-039 and ICGF-774-040 has been changed to emergency only.

The kW ratings for engines/generators ICGF-1126-042, ICGF-2115-021, ICGF-3854-001, and ICGF-3854-002 have been corrected.

Generators ICGF-3550-031, ICGF-3816A-003, ICGF-3816A-004, and ICGF-3892-035 have been removed from the equipment list. These units have been removed from the facility.

Emergency generators ICGF-2000-057, ICGF-1628-062, ICGF-1618-001, ICGF-2115-001, ICGF-3400-001, ICGF-3708-001, ICGF-3892-001, ICGF-3509-001, ICGF-1555-001, and ICGF-3537-001 have been added to the equipment list. These units were installed since the last Title V permit was issued, but did not require NSR permitting, due to their small sizes and use as emergency generators.

Non-emergency generators ICGF-L3-TRITON, ICGF-L3-MTU, ICGF-L3-WACKER, ICGF-Oceanneering-WACKER, and ICGF-Oceanneering-GENERAC have also been added to the equipment list. An NSR permit was issued for these units on August 28, 2015. The NSR requirements were included in the SOP dated November 9, 2015.

Paint booths PNTS-3661-006 and PNTS-CB125-016 (PNTS-GRP1) have been removed from the permit. These units are no longer in operation.

GSTA-3084-005 has been replaced with GSTA-3093-001.

EMISSIONS INVENTORY

A copy of the 2014 emissions report is attached. Emissions are summarized in the following tables.

2014 Actual Emissions

	2014 Criteria Pollutant Emission in Tons/Year					
	VOC	CO	SO ₂	PM ₁₀	PM _{2.5}	NOx
Total	11.511	8.735	0.614	2.495	0.713	36.061

2014 Facility Hazardous Air Pollutant Emissions

Pollutant	2014 Hazardous Air Pollutant Emissions in Tons/Yr
Ammonia (NH ₃)	0.485

III. EMISSION UNIT APPLICABLE REQUIREMENTS - Abrasive Blasting Operations Requirements - ABRA-GRP1 and ABRA-3816A-024

Limitations

The following limitations are derived from the State Operating Permit issued November 9, 2015:

- Condition 1 (SOP Condition 2): Approved Media
- Condition 2 (SOP Condition 3): Emission Controls
- Condition 3 (SOP Condition 4): Throughput
- Condition 4 (SOP Condition 5): Process Emission Limits
- Condition 5 (SOP Condition 6): Visible Emission Limit

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

- | | |
|--------------|------------------------------------------------------------------------|
| 9VAC5-50-80 | Standard for Visible Emissions for New and Modified Stationary Sources |
| 9VAC5-50-260 | BACT Standard for New and Modified Stationary Sources |

The 20/30% new source opacity standard has been included in Condition 6 for ABRA-3816A-003.

Monitoring

Additional periodic monitoring requirements which meet the requirements of Part 70 are outlined in Condition 7 for ABRA-CB125-012 and ABRA-CB125-023. The source is required to perform monthly visual emissions observations on each baghouse stack exhaust for each abrasive blasting booth. If such visual observation indicates any visible emissions, the source is required to take corrective action to eliminate the visible emissions. If corrective action fails to eliminate the visible emissions, the source is required to conduct a Method 9 visible emissions evaluation (VEE) to determine compliance with the opacity limit in Condition 5. The source is required to maintain records of all visual emissions observations/VEEs. The recordkeeping requirements have been re-formatted into a list for clarity.

No periodic monitoring has been included for ABRA-3816A-003. No visible emissions in excess of the 20/30% opacity standard are expected from this operation.

Recordkeeping

Condition 8 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. The annual throughput of new steel grit blasting media (in tons) for the abrasive blasting booths (Ref. Nos. ABRA-CB125-012 and ABRA-CB125-023), combined, calculated monthly for the latest 12-consecutive month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- b. Records of the following items for each abrasive blasting booth baghouse stack exhaust (Ref. Nos. STABRA-CB125-001 through 004):
 - i. Records of monthly visual observations, including the name of the observer, the date and time of the observation, identification of the stack, an indication that the process was operating, an indication of the presence or absence of visible emissions, the duration of any visible emission

incident, and any corrective action taken to eliminate visible emissions, including the date and time the process was shut down and/or repairs were completed.

- ii. Each Method 9 visible emissions evaluation performed.

IV. EMISSION UNIT APPLICABLE REQUIREMENTS - Fuel Burning Equipment Requirements - BOIL-777-001, BOIL-777-002, BOIL-777-003, BOIL-777-004, BOIL-3511-007, BOIL-1602-009, BOIL-1602-010, BOIL-3445-011, BOIL-3445-012, BOIL-3049A-013, BOIL-3049A-014, BOIL-3056-021, BOIL-3129-022, BOIL-3147-023, BOIL-3363-024, BOIL-3364-025, BOIL-3408-026, BOIL-3430-027, BOIL-3445-028, BOIL-3505-029, BOIL-3690-030, BOIL-3854-031, OCOM-CB301-025, and OCOM-CB301-026.

Limitations

The following limitations are derived from the State Operating Permit issued November 9, 2015:

- Condition 9 (SOP Condition 8): Fuel
- Condition 10 (SOP Condition 9): Fuel
- Condition 11 (SOP Condition 10): Fuel Throughput
- Condition 12 (SOP Condition 11): Emission Controls
- Condition 13 (SOP Condition 12): Requirements by Reference
- Condition 14 (SOP Condition 13): Process Emission Limits
- Condition 15 (SOP Condition 14): Visible Emission Limit

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

- | | |
|--------------|-------------------------------------------------------------------------------------|
| 9VAC5-50-260 | BACT Standard for New and Modified Stationary Sources |
| 9VAC5-50-400 | EPA New Source Performance Standards (General) |
| 9VAC5-50-410 | EPA New Source Performance Standards (Designated standards of performance) |
| 9VAC5-60-90 | EPA Maximum Achievable Control Technology Standards (General) |
| 9VAC5-60-100 | EPA Maximum Achievable Control Technology Standards (Designated emission standards) |

The following Codes of Federal Regulations have been determined to be applicable:

- | | |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| 40 CFR 60, Subpart Dc | Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units |
| 40 CFR 63, Subpart DDDDD | National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters |

The requirements for the Group II boiler (Ref. No. BOIL-3870-004) have been removed. This unit is no longer at the facility. These changes are also reflected in the SOP.

The applicable limitations from MACT DDDDD are included in Conditions 16 and 17.

Testing and Monitoring

The fuel certification condition from the SOP (SOP Condition 15) is included in Condition 18.

Additional periodic monitoring requirements which meet the requirements of Part 70 are outlined in Condition 19 for each Group I boiler. The source is required to perform monthly visual emissions observations on each Group I boiler stack. If such visual observation indicates any visible emissions, the source is required to take corrective action to eliminate the visible emissions. If corrective action fails to eliminate the visible emissions, the source is required to conduct a Method 9 visible emissions evaluation (VEE) to determine compliance with the opacity limit in Condition 15. The source is required to maintain records of all visual emissions observations/VEEs. The recordkeeping requirements have been re-formatted into a list for clarity.

The testing and monitoring requirements from MACT DDDDD are included in Conditions 20 and 21.

Notifications, Recordkeeping, and Reporting

Condition 22 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. For each of the Group I boilers (Ref. Nos. BOIL-777-001, 002, 003, and 004), the monthly and annual throughput of distillate oil (in gallons) and natural gas (in cubic feet). Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- b. The annual throughput of distillate oil (in gallons) and natural gas (in cubic feet) for the Group I boilers (Ref. Nos. BOIL-777-001, 002, 003, and 004), combined, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- c. All fuel supplier certifications for the distillate oil delivered for the Group I boilers (Ref. Nos. BOIL-777-001, 002, 003, and 004), as required by Condition 18.
- d. Records of the following items for each Group I boiler stack:
 - i. Records of monthly visual observations, including the name of the observer, the date and time of the observation, identification of the stack, an indication that the process was operating, an indication of the presence or absence of visible emissions, the duration of any visible emission incident, and any corrective action taken to eliminate visible emissions, including the date and time the process was shut down and/or repairs were completed.
 - ii. Each Method 9 visible emissions evaluation performed.

The notification, recordkeeping, and reporting requirements from MACT DDDDD are included in Conditions 23 and 24.

The NSPS Dc fuel quality reporting requirements are included in Condition 25.

V. EMISSION UNIT APPLICABLE REQUIREMENTS - Engine/Generator Requirements - (See table in Section V of Title V permit for Emission Unit ID's)

The equipment table at the beginning of this section has been updated with all of the equipment changes noted in Section II. It has also been updated to include all of the engine/generators at the facility.

Limitations

The following limitations are derived from the State Operating Permit issued November 9, 2015:

- Condition 26 (SOP Condition, 18 and 22): Fuel
- Condition 27 (SOP Conditions 19 and 23): Fuel
- Condition 28 (SOP Condition 20): Fuel
- Condition 29 (SOP Condition 21): Fuel Throughput
- Condition 30 (SOP Condition 24): Fuel Throughput
- Condition 31 (SOP Condition 25): Emission Controls
- Condition 32 (SOP Condition 26): Emission Controls
- Condition 33 (SOP Condition 27): Operation of the Non-Emergency Generators
- Condition 34 (SOP Condition 28): Generator Engine Fuel
- Condition 35 (SOP Condition 29): Generator Engine Fuel Throughput
- Condition 50 (SOP Condition 30): Process Emission Limits
- Condition 51 (SOP Condition 31): Process Emission Limits
- Condition 52 (SOP Condition 32): Emission Limits
- Condition 53 (SOP Condition 33): Visible Emission Limit
- Condition 54 (SOP Condition 34): Visible Emission Limit

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

- | | |
|--------------|-------------------------------------------------------------------------------------|
| 9VAC5-50-260 | BACT Standard for New and Modified Stationary Sources |
| 9VAC5-50-400 | EPA New Source Performance Standards (General) |
| 9VAC5-50-410 | EPA New Source Performance Standards (Designated standards of performance) |
| 9VAC5-60-90 | EPA Maximum Achievable Control Technology Standards (General) |
| 9VAC5-60-100 | EPA Maximum Achievable Control Technology Standards (Designated emission standards) |

The following Codes of Federal Regulations have been determined to be applicable:

- | | |
|-------------------------|-------------------------------------------------------------------------------------------------------------------|
| 40 CFR 60, Subpart IIII | Standards of Performance for Stationary Compression Ignition Internal Combustion Engines |
| 40 CFR 63, Subpart ZZZZ | National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines |

The requirements for generators ICGF-3550-031, ICGF-3816A-003, ICGF-3816A-004, and ICGF-3892-035 have been removed. These units are no longer at the facility. These changes are also reflected in the SOP.

The approved fuel and fuel specification requirements for generators OCOM-3872-010, 011, 019, and 020, ICGF-777-037, ICGF-1265-049, ICGF-1265-053, ICGF-1265-059, ICGF-773-039 and ICGF-774-040 (SOP Conditions 18 and 22 and 19 and 23) have been combined to reduce redundancy in the permit. These conditions were originally separated because the engines/generators were separated into groupings (Group II, III, and V); however, now that all of the units are significant, the source has requested that the groupings be eliminated. The fuel requirements for the non-emergency generators (Ref. Nos. ICGF-L3-TRITON, ICGF -L3-MTU, ICGF-L3-WACKER, ICGF-Oceanering-WACKER, and ICGF-Oceanering-GENERAC) have been included in a separate condition, as these conditions reference the requirements for “diesel fuel” and not “distillate oil”, as required in the DEQ Diesel Engine Boilerplate dated January 28, 2013.

The applicable limitations, monitoring, recordkeeping, and reporting requirements from NSPS IIII are included in Condition 36.

The applicable limitations, monitoring, recordkeeping, and reporting requirements from MACT ZZZZ are included in Conditions 37 through 50.

Condition 53 has been revised to cover all of the engines/generators at the facility, except for the non-emergency generators, which are subject to a 5% opacity standard (Condition 54).

Monitoring

The fuel certification requirements from the SOP (SOP Conditions 35 and 36) are included in Conditions 55 and 56.

Additional periodic monitoring requirements which meet the requirements of Part 70 are outlined in Condition 57 for generators ICGF-773-039 and ICGF-774-040. The source is required to perform annual visual emissions observations on each generator stack. If such visual observation indicates any visible emissions, the source is required to take corrective action to eliminate the visible emissions. If corrective action fails to eliminate the visible emissions, the source is required to conduct a Method 9 visible emissions evaluation (VEE) to determine compliance with the opacity limit in Condition 57. The source is required to maintain records of all visual emissions observations/VEEs. The recordkeeping requirements have been re-formatted into a list for clarity.

Additional periodic monitoring requirements which meet the requirements of Part 70 are outlined in Condition 58 for the non-emergency generators (Ref. Nos. ICGF-L3-TRITON, ICGF -L3-MTU, ICGF-L3-WACKER, ICGF-Oceanering-WACKER, and ICGF-Oceanering-GENERAC). The source is required to perform annual visual emissions observations on each generator stack. If such visual observation indicates any visible emissions, the source is required to take corrective action to eliminate the visible emissions. The source is required to maintain records of all visual emissions observations.

Recordkeeping and Reporting

Condition 59 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. The annual throughput of distillate oil (in gallons) for engines/generators OCOM-3872-010,011, 019, and 020, ICGF-777-037, ICGF-1265-049, ICGF-1265-053, and ICGF-1265-059, combined, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- b. The annual throughput of distillate oil (in gallons) for generators ICGF-773-039 and ICGF-774-040, combined, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- c. The annual throughput of diesel fuel (in gallons) consumed by the engines used to operate the stationary non-emergency generators (Ref. Nos. ICGF-L3-TRITON, ICGF -L3-MTU, ICGF-L3-WACKER, ICGF-Oceaneering-WACKER, and ICGF-Oceaneering-GENERAC), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. The permittee shall demonstrate compliance with this fuel throughput limit by tracking the monthly quantities of fuel delivered for use in the stationary non-emergency generators;
- d. All fuel supplier certifications for the distillate oil/diesel fuel delivered for the engines/generators, as required by Conditions 55 and 56.
- e. Information on each stationary non-emergency generator set (Ref. Nos. ICGF-L3-TRITON, ICGF -L3-MTU, ICGF-L3-WACKER, ICGF-Oceaneering-WACKER, and ICGF-Oceaneering-GENERAC), including the engine make, model, serial number, model year, maximum engine power (bhp), and engine displacement, and the generator's rated electrical power output (kW); and
- f. The manufacturer's written operating instructions or procedures developed by the owner/operator that is approved by the engine manufacturer for each stationary non-emergency generator (Ref. Nos. ICGF-L3-TRITON, ICGF -L3-MTU, ICGF-L3-WACKER, ICGF-Oceaneering-WACKER, and ICGF-Oceaneering-GENERAC).
- g. Records as necessary to demonstrate compliance with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ for the engines and generators listed in the table at the beginning of Section V as applicable to these subparts.

- h. Records of the following items for each generator stack:
 - i. Records of annual visual observations for generators ICGF-773-039, ICGF-774-040, ICGF-L3-TRITON, ICGF -L3-MTU, ICGF-L3-WACKER, ICGF-Oceaneering-WACKER, and ICGF-Oceaneering-GENERAC, including the name of the observer, the date and time of the observation, identification of the stack, an indication that the process was operating, an indication of the presence or absence of visible emissions, the duration of any visible emission incident, and any corrective action taken to eliminate visible emissions, including the date and time the process was shut down and/or repairs were completed, as required by Conditions 57 and 58.
 - ii. Each Method 9 visible emissions evaluation performed for generators ICGF-773-039, ICGF-774-040, as required by Condition 58.

VI. EMISSION UNIT APPLICABLE REQUIREMENTS - Firing Range Requirements - (FIRI-GRP: FIRI-3817-001 and FIRI-3638-002)

Limitations

The following limitations are derived from the State Operating Permit issued November 9, 2015

Condition 60 (SOP Condition 38): Emission Controls
Condition 61 (SOP Condition 39): Visible Emission Limit

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9VAC5-50-80 Standard for Visible Emissions for New and Modified Stationary Sources

Monitoring

Periodic monitoring requirements which meet the requirements of Part 70 are outlined in Condition 62. The source is required to perform annual visual emissions observations on each firing range stack. If such visual observation indicates any visible emissions, the source is required to take corrective action to eliminate the visible emissions. If corrective action fails to eliminate the visible emissions, the source is required to conduct a Method 9 visible emissions evaluation (VEE) to determine compliance with the opacity limit in Condition 61. The source is required to maintain records of all visual emissions observations/VEEs. The recordkeeping requirements have been re-formatted into a list for clarity.

Recordkeeping and Reporting

Condition 63 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Records of annual visual observations, including the name of the observer, the date and time of the observation, identification of the stack, an indication that the process was operating, an indication of the presence or absence of visible emissions, the duration of any visible emission incident, and any corrective action taken to eliminate visible emissions, including the date and time the process was shut down and/or repairs were completed.
- b. Each Method 9 visible emissions evaluation performed.

VII. EMISSION UNIT APPLICABLE REQUIREMENTS - Gasoline Operations Requirements - (GSTA-1612-003, GSTA-3093-001, GSTA-3836A-006, and PETO-3838-001A)

All references to GSTA-3084-005 have been changed to GSTA-3093-001. As indicated in Section II, GSTA-3093-001 has replaced GSTA-3084-005.

Limitations

The following Virginia Administrative Code has specific emission requirements that have been determined to be applicable:

9VAC5-40-5200 et seq. Emission Standards For Petroleum Liquid Storage and Transfer Operations
(Rule 4-37)

Monitoring

Periodic monitoring requirements which meet the requirements of Part 70 are outlined in Condition 65. The source is required to observe a gasoline delivery to GSTA-1612-003, GSTA 3093-001, GSTA-3860-006, and PETO-3838-001A once per year to determine compliance with the Stage 1 requirements outlined in Condition 64.

Recordkeeping

Condition 66 includes requirements for maintaining records of all monitoring and testing required by the permit. The permittee is required to maintain records of the annual Stage I vapor recovery system usage monitoring results, including any corrective actions taken, if necessary.

VIII. EMISSION UNIT APPLICABLE REQUIREMENTS - Painting Operations Requirements - Shipbuilding/Ship Repair (PNTS-PIER SIDE and PNTS-SHIP)

Limitations

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9VAC5-50-20 F	Compliance for New and Modified Stationary Sources (Disposal of Volatile Organic Compounds)
9VAC5-60-90	EPA Maximum Achievable Control Technology Standards (General)
9VAC5-60-100	EPA Maximum Achievable Control Technology Standards (Designated emission standards)

The following Code of Federal Regulations has been determined to be applicable:

40 CFR 63, Subpart II National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)

The applicable limitations from MACT II are included in Conditions 67 through 73.

The VOC work practice requirements from 9VAC5-50-20 F are included in Condition 74.

Monitoring

The applicable monitoring requirements from MACT II are included in Condition 75.

Recordkeeping

The applicable recordkeeping requirements from MACT II are included in Condition 76. These records include:

- a. For each compliance procedure used (40 CFR 63.785(c)(1), (2), (3), and (4)), the permittee shall maintain records to demonstrate compliance with the chosen procedure. (9VAC5-80-110 and 40 CFR 63.785(c)).
- b. Each owner or operator shall comply with the applicable recordkeeping and reporting requirements in 40 CFR 63.10(a), (b), (d), and (f). (9VAC5-80-110, 9VAC5-60-100, and 40 CFR 63.788(a))
- c. Each owner or operator of a major source shipbuilding or ship repair facility having surface coating operations with less than 264 gallons annual marine coating usage shall record the total volume of coating applied at the source to ships. Such records shall be compiled monthly and maintained for a minimum of 5 years. (9VAC5-80-110, 9VAC5-60-100, and 40 CFR 63.788(b)(1))
- d. For each coating used in ship painting (Ref. Nos. PNTS-SHIP), the permittee shall compile records on a monthly basis. At a minimum, these records shall include:
 - i. All documentation supporting initial notification;
 - ii. A copy of the approved implementation plan;
 - iii. The volume of each low-usage exempt coating applied;

- iv. Identification of the coatings used, their appropriate coating categories, and the applicable VOHAP limit;
- v. Certification of the as-supplied VOHAP content of each batch of coating;
- vi. A determination of whether containers meet the standards as described in 63.783(b)(2) (Condition 72);
- vii. The results of any Method 24 of appendix A to 40 CFR part 60 or approved VOHAP measurement test conducted on individual containers of coating, as applied; and
- viii. Any additional information as determined by the compliance procedure(s) described in 63.785(c) that the permittee followed.

Reporting

The applicable reporting requirements from MACT II are included in Condition 77.

IX. EMISSION UNIT APPLICABLE REQUIREMENTS - Painting Operations Requirements - Wood Finishing (PNTS-WOOD)

Limitations

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9VAC5-50-20 F	Compliance for New and Modified Stationary Sources (Disposal of Volatile Organic Compounds)
9VAC5-60-90	EPA Maximum Achievable Control Technology Standards (General)
9VAC5-60-100	EPA Maximum Achievable Control Technology Standards (Designated emission standards)

The following Code of Federal Regulations has been determined to be applicable:

40 CFR 63, Subpart JJ National Emission Standards for Wood Furniture Manufacturing Operations

The applicable limitations from MACT JJ are included in Condition 78 through 80.

The VOC work practice requirements from 9VAC5-50-20 F are included in Condition 81.

Recordkeeping

The applicable recordkeeping requirements from MACT JJ are included in Condition 82. These records shall include, but are not limited to, purchase or usage records demonstrating that the source meets the definition of "incidental wood furniture manufacturer" in 40 CFR 63.801.

X. EMISSION UNIT APPLICABLE REQUIREMENTS - Woodworking Operations Requirements - (WOOD-GRP1 and WOOD-GRP2)

Limitations

The following Virginia Administrative Code has specific emission requirements that have been determined to be applicable:

9VAC5-40-2250 et seq. Emission Standards For Woodworking Operations (Rule 4-17)

The applicable limitations from Rule 4-17 are included in Conditions 83 through 85.

The 20/60% existing source opacity standard is included in Condition 86 for units WOOD-1618-008, WOOD-1522-003, WOOD-3165-004, WOOD-3227-005, WOOD-117-006, and WOOD-3530-009.

The 20/30% new source opacity standard is included in Condition 87 for unit WOOD-3806-001.

Monitoring

Periodic monitoring requirements which meet the requirements of Part 70 are outlined in Condition 88. The source is required to perform annual internal inspections on each cyclone to ensure structural integrity. For units with no access to perform an internal inspection, external inspections are deemed acceptable.

Condition 89 also requires that the source perform annual visual emissions observations (VEO) on each woodworking exhaust. Lack of visible emissions shall indicate compliance with the provisions of 9VAC5-40-2270 B, as outlined in Condition 84. If such periodic evaluations indicate any visible emissions, the permittee shall take appropriate action to correct the cause of the visible emissions. The source is required to maintain records of all VEOs. This condition has been revised from the previous permit to include a more appropriate compliance demonstration with the emission limit in Condition 84. While this condition does not provide a means of determining direct compliance with the 0.05 gr/scf limit, it can be assumed that the lack of visible emissions provides reasonable assurance that the limit is not being exceeded. The recordkeeping requirements have also been re-formatted into a list for clarity.

Recordkeeping

Condition 90 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Annual inspection results of the cyclones (Ref. Nos. CDWOOD-1522-003, CDWOOD-3165-004, CDWOOD-3227-005, CDWOOD-117-006, CDWOOD-3530-009, and CDWOOD-3806-001);
- b. Records of annual visual observations for each woodworking stack (Ref. Nos. STWOOD-1618-008, STWOOD-1522-003, STWOOD-3165-004, STWOOD-3227-005, STWOOD-117-006, STWOOD-3530-009, and STWOOD-3806-001), including the name of the observer, the date and time of the observation, identification of the stack, an indication that the process was operating, an indication of the presence or absence of visible emissions, the duration of any visible emission incident, and any corrective action taken to eliminate visible emissions, including the date and time the process was shut down and/or repairs were completed.

XI. EMISSION UNIT APPLICABLE REQUIREMENTS - Degreasing Operations Requirements - Non-Halogenated Cold Cleaners (DEGS-GRP1)

Limitations

The following Virginia Administrative Code has specific emission requirements that have been determined to be applicable:

9VAC5-40-3260 et seq. Emission Standards For Solvent Metal Cleaning Operations Using Non-Halogenated Solvents (Rule 4-24)

The applicable limitations from Rule 4-24 are included in Conditions 91 through 93.

Monitoring

Periodic monitoring requirements which meet the requirements of Part 70 are outlined in Conditions 94 and 95. The source is required to perform annual inspections on each degreasing unit to ensure that the label with the operating procedures is placed on or near the unit. The source is also required to perform annual inspections on each degreasing unit to ensure that each unit has a cover or enclosed remote reservoir, and waste solvent from each unit is stored in closed containers.

Recordkeeping

Condition 96 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Annual inspection results and any corrective actions taken;
- b. Method(s) of waste solvent disposal.

XII. EMISSION UNIT APPLICABLE REQUIREMENTS - Facility Wide

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9VAC5-50-30 F Performance Testing for New and Modified Stationary Sources

Testing

The facility-wide testing requirements from the SOP (SOP Condition 1) are included in Condition 97.

If testing is conducted in addition to the monitoring specified in the permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ (Condition 98).

XIII. Compliance Plan

A DEQ-EPA joint inspection in June 2011 indicated that the source is out of compliance with 40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines), 40 CFR 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines), and 40 CFR 82, Subpart F (Protection of Stratospheric Ozone: Recycling and Emissions Reduction). The source has not yet received the inspection report from EPA; however, the source has submitted a Compliance Plan as part of the Title V renewal application. The plan has been included in Conditions 100 through 109 and outlines a schedule for coming into compliance with each federal requirement with which the source is currently out of compliance, as follows:

Title V Permit Condition(s) With Which Source is Out of Compliance	Regulatory Citation(s)	Description of Requirement	Proposed Compliance Schedule	Compliance Plan Title V Permit Condition
General Condition 147 (Stratospheric Ozone Protection)	40 CFR 82.156(i)(5)	Leak rate calculations for equipment normally containing 50 pounds or more refrigerant charge	Within 6 months of permit issuance	Condition 101
Conditions 38, 40, and 41	40 CFR 63.6645(a)	Initial notifications for each non-emergency generator	Within 1 month of permit issuance	Condition 102
Conditions 45 and 46	40 CFR 63.6625(d) and (f), 40 CFR 63.6655(f)	Record through the non-resettable hour meter the time of operation of the engine and the reason the engine was in operation during that time	Within 12 months of permit issuance	Condition 103
Conditions 42 and 47	40 CFR 63.6640(f)(1-3)	Records of operating hours to show the engines meet the definition of "emergency engine".	Within 12 months of permit issuance	Condition 104
Condition 36	40 CFR 60.4209(a), 40 CFR 60.4214(b)	Record through the non-resettable hour meter the time of operation of the engine and the reason the engine was in operation during that time	Within 12 months of permit issuance	Condition 105
Condition 36	CFR 60.4207(b), 40 CFR 80.510(b)	Records to document that the fuel meets the requirements of 40 CFR 80.510(b): <ul style="list-style-type: none"> • Maximum sulfur content of 15 ppm • Minimum cetane index of 40 or maximum aromatic content of 35% by volume 	Within 12 months of permit issuance	Condition 106

Although Conditions 103 and 105 outline similar requirements, each regulation (MACT ZZZZ, NSPS IIII) contains slightly different language and compliance requirements. The requirements have been broken up into separate conditions to allow for the use of the specific language from each regulation.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9VAC5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

112-117. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

This general condition cite(s) the Article(s) that follow(s):

Article 1 (9VAC5-80-50 et seq.), Part II of 9VAC5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9VAC5-80-80. Application

9VAC5-80-140. Permit Shield

9VAC5-80-150. Action on Permit Applications

123. Failure/Malfunction Reporting

Section 9VAC5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9VAC5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9VAC5-20-180 is from the general regulations. All affected facilities are subject to section 9VAC5-20-180 including Title V facilities. Section 9VAC5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9VAC5-20-180 and 9VAC5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

This general condition cites the sections that follow:

9VAC5-40-50 Notification, Records and Reporting

9VAC5-50-50 Notification, Records and Reporting

127. Permit Modification

This general condition cites the sections that follow:

9VAC5-80-50 Applicability, Federal Operating Permit For Stationary Sources

9VAC5-80-190 Changes to Permits

9VAC5-80-260 Enforcement

9VAC5-80-1100 Applicability, Permits For New and Modified Stationary Sources

9VAC5-80-1605 Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9VAC5-80-2000 Applicability, Permits for Major Stationary Sources and Major Modifications
Locating in Nonattainment Areas

141-144. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9VAC5-80-250 and 9VAC5-20-180. The malfunction requirements are listed in General Conditions 141-144 and General Condition 123. For further explanation see the comments on General Condition 123.

These general conditions cite the sections that follow:

9VAC5-20-180 Facility and Control Equipment Maintenance or Malfunction
9VAC5-80-110 Permit Content

148. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains the citations from the Code of Federal Regulations that follow:

40 CFR 61.145, National Emissions Standards for Asbestos as it applies
NESHAP Subpart M to demolition and renovation

40 CFR 61.148, National Emissions Standards for Asbestos as it applies to
NESHAP Subpart M insulating materials

40 CFR 61.150, National Emissions Standards for Asbestos as it applies to waste
NESHAP Subpart M disposal

This general condition cites the regulatory sections that follow:

9VAC5-60-70 Designated Emissions Standards
9VAC5-80-110 Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State:

- 9VAC5, Chapter 40, Part II, Article 2: Existing Source Standards for Odor (Rule 4-2)
- 9VAC5, Chapter 60, Part II, Article 4: Existing Source Standards for Toxic Pollutants (Rule 6-4)
- 9VAC5, Chapter 50, Part II, Article 2: New and Modified Source Standards for Odor (Rule 5-2)
- 9VAC5, Chapter 60, Part II, Article 5: New and Modified Source Standards for Toxic Pollutants (Rule 6-5)

INAPPLICABLE REQUIREMENTS

Citation	Title of Citation	Description of Applicability
40 CFR, Part 63, Subpart JJ	National Emission Standards for Wood Furniture Manufacturing Operations. All sections except §63.801.	JEB Little Creek meets the definition of "incidental wood furniture manufacturer" in 40 CFR 63.801 (a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components). The facility is exempt from the requirements of this subpart with the exception of the requirement to maintain records of the purchase/usage of finishing material and adhesives to demonstrate qualification as an incidental wood furniture manufacturer.
40 CFR, Part 63, Subpart IIII	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks	JEB Little Creek does not conduct surface coating of new automobile or light-duty truck bodies or body parts. All surface coating of vehicles consists of refinishing operations.
40 CFR, Part 63, Subpart MMMM	National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products	This subpart does not apply to the surface coating of metal parts and products performed on-site at installations owned or operated by the Armed Forces of the United States.
40 CFR, Part 63, Subpart NNNN	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances	JEB Little Creek does not coat any "Large Appliances" as defined by this regulation.
40 CFR, Part 63, Subpart P PPPP	National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Stands	JEB Little Creek does not operate any engine test cells/stands. All engines are used to power generators or pumps.
40 CFR, Part 63, Subpart R RRRR	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture	JEB Little Creek does not operate any metal furniture coating lines.
40 CFR, Part 63, Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	JEB Little Creek is not an area source of HAPs.
40 CFR, Part 61,	National Emission Standards for	JEB Little Creek does not process or manufacture

Citation	Title of Citation	Description of Applicability
Subpart M	Asbestos. All sections except for 40 CFR §61.145, §61.146, §61.150, §61.152 and §61.153	asbestos containing products and is only subject to the regulations associated with removal and disposal of asbestos containing material.
40 CFR, Part 60, Subpart EE	NSPS for Surface Coating of Metal Furniture	JEB Little Creek does not operate any metal furniture coating lines.
40 CFR, Part 60, Subpart Kb	NSPS for VOC Liquid Storage Tanks	JEB Little Creek storage tanks contain liquids below the listed exempt vapor pressure.
40 CFR, Part 60, Subpart MM	NSPS for Automobile and Light-Duty Truck Coating Operations	JEB Little Creek is not an automobile and light-duty truck assembly plant.
40 CFR, Part 60, Subpart SS	NSPS for Industrial Surface Coating Large Appliances and Products	JEB Little Creek does not coat any "Large Appliance Parts" or "Large Appliance Products" as defined by the regulation.
9VAC5, Chapter 40 Article 25	VOC Standards That Apply to Storage or Transfer of Volatile Organic Liquids Other Than Petroleum Liquids	These requirements do not apply to fixed roof tanks with a storage capacity less than 40,000 gallons containing volatile organic liquids other than petroleum liquids.
9VAC5, Chapter 40, Article 26	VOC Emission Standards For "Existing" Large Appliance Coating Application Systems	JEB Little Creek does not coat any "Large Appliance Parts" or "Large Appliance Products" as defined by the regulation.
9VAC5, Chapter 40, Article 28	VOC Emission Standards For Automobile And Light Duty Truck Coating Application Systems	JEB Little Creek coating operations are not an integral part of a production process and consist of vehicle refinishing operations. This allows the units to be exempt from this regulation pursuant to 9VAC5-40-3860 C 1.
9VAC5, Chapter 40, Article 34	VOC Standards For Coating Operations of Miscellaneous Metal Parts and Products.	Manufacturing and coating operations of miscellaneous metal parts are not an integral part of any coating process. JEB Little Creek operations consist of vehicle refinishing, vehicle customized coating operations, and/or coating of fully assembled aircraft and marine vessels. This allows the units to be exempt from this regulation pursuant to 9VAC5-40-4760 D.

Joint Expeditionary Base Little Creek is not currently subject to GHG regulations. There are no applicable GHG permitting requirements for this source.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9VAC5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)	Building/ Location
Boilers					
Group I Furnaces (FURN-GRP1)					
FURN-4190-001, FURN-CB125-002, FURN-CB125-003, FURN-CB125-004, & FURN-CB125-005	Natural gas-fired furnaces. Installed after 1972.	9VAC5-80-720 C		Each < 10 MMBtu/hr	Various
Small fuel pumping operations					
Small Gasoline Pumping Operations (GSTA-GRP1)					
GSTA-QUAY-001, GSTA-3699-014, GSTA-3110-015, GSTA-3022-016, GSTA-U87-017, & GSTA-1522-018	Pump gasoline from small storage tanks into water craft, various off-road vehicles, or other containers	9VAC5-80-720 B	VOC/HAPS		Various
Small Diesel Pumping Operations (GSTA-GRP3)					
GSTA-1619-004, GSTA-3860-007, GSTA-QUAY-010, GSTA-3110-011, GSTA-U87-013, & GSTA-1522-019	Pump diesel oil into water craft, various off-road vehicles, or other	9VAC5-80-720 B	VOC/HAPS		Various
Small Gasoline/Oil Premix Pumping Operations (GSTA-GRP4)					
GSTA-1620-009	Small gasoline/oil premix pumping operations	9VAC5-80-720 B	VOC/HAPS		Bldg 1620
Distillate Oil and JP-5 Operations					
PETO-3861-001B	Distillate oil loading rack	9VAC5-80-720 B	VOC/HAPS		Bldg 3861
PETO-3826A-002	JP-5 loading rack (off load truck)	9VAC5-80-720 B	VOC/HAPS		Bldg 3826A
GSTA-3843-012	LCAC JP-5 service station	9VAC5-80-720 B	VOC/HAPS		Bldg 3843
GSTA-3844-012	LCAC JP-5 service station	9VAC5-80-720 B	VOC/HAPS		Bldg 3844
GSTA-PIER19-002	Pier 19 distillate	9VAC5-80-720 B	VOC/HAPS		Pier 19

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)	Building/ Location
	oil pumping station				
Storage Tanks					
FF Tanks					
TNKA-3863-001, TNKA-3864-001, TNKA-3837-001, & TNKA-3839-001	Fuel Farm distillate oil tanks	9VAC5-80-720 B	VOC/HAPS		Fuel Farm
Group II Tanks (TG-II)					
TNKA-3870-002, TNKA-3872-002, TNKA-1166-001, TNKA-1265-006, TNKA-1265-008, TNKA-1518-003, TNKA-1555-001, TNKA-1609-001, TNKA-2000-001, TNKA-2083-001, TNKA-3006-001, TNKA-3445-001, TNKA-3505-002, TNKA-3550-001, TNKA-3892-003, TNKA-3823-003, TNKA-1126-001, TNKA-1265-007, TNKA-1501-002, TNKA-1518-002, TNKA-2115-002, TNKA-3015-001, TNKA-3150-001, TNKA-3165-003, TNKA-3400-002, TNKA-3505-001, TNKA-3823-002, TNKA-3848-002, TNKA-3856-001, TNKA-3879-002, TNKA-5000-001, & TNKA-1516-003	Small diesel storage tanks	9VAC5-80-720 B	VOC/HAPS		Various
Group III Tank (TG-III)					
TNKA-NAB775-001	Small diesel storage tank (emergency generator supply)	9VAC5-80-720 B	VOC/HAPS		NAB-773

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)	Building/ Location
Group IV Tank (TG-IV)					
TNKU-044	Gasoline storage tank	9VAC5-80-720 B	VOC/HAPS		Cove Marina
Group V Tanks (TG-V)					
TNKA-1515-020, TNKA-3699-043, & TNKA-3022-003	Small gasoline storage tanks	9VAC5-80-720 B	VOC/HAPS		Various
Group VI Tanks (TG-VI)					
TNKA-3825-001, TNKA-3845-001, & TNKA-3846-001	JP-5 above ground storage tanks	9VAC5-80-720 B	VOC/HAPS		Various
Group VII Tanks (TG-VII)					
TNKU-1558-001, TNKU-1558-002, TNKU-1558-003, & TNKU-1558-007	Kerosene/Isopar /Norpar storage tanks	9VAC5-80-720 B	VOC/HAPS		Bldg 1558
Group VIII Tanks (TG-VIII)					
TNKA-3860-023, TNKA-3868-035, TNKA-3530-037, TNKA-3661-041, TNKA-3872-067, TNKA-1558-068, TNKA-3821-082, TNKA-3869-084, TNKA-3859-095, & TNKA-CB301-003	Small used oil storage tanks. All installed after 1984.	9VAC5-80-720 B	VOC/HAPS		Various
Group IX Tank (TG-IX)					
TNKA-NAB778-001	Distillate oil storage tank. Installed 08/20/2004 to 12/15/2005.	9VAC5-80-720 B	VOC/HAPS		Bldg 777
Woodworking Operations					
WOOD-108-001	Woodworking Shop	9VAC5-80-720 B	PM/PM-10		Bldg 108
WOOD-1265-002	Woodworking Shop	9VAC5-80-720 B	PM/PM-10		Bldg 1265
WOOD-3334-009	Woodworking Shop	9VAC5-80-720 B	PM/PM-10		Bldg 3334
WOOD-1125-012	Woodworking Shop	9VAC5-80-720 B	PM/PM-10		Bldg 1125

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)	Building/ Location
Chemical Cleaning Operations					
CHMC-3826-006 & CHMC-3826-007	Chemical Cleaning Booths	9VAC5-80-720 B	VOC		Bldg 3826
Fiberglass Repair Operations					
FIBE-1610-003	Fiberglass Repair	9VAC5-80-720 B	VOC		Bldg 1610

¹The citation criteria for insignificant activities are as follows:
 9VAC5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
 9VAC5-80-720 B - Insignificant due to emission levels
 9VAC5-80-720 C - Insignificant due to size or production rate

Changes to the Insignificant Emission Unit list:

The Group II, Group III and Group IV boilers have been moved to the Significant Emission Unit list in Section II. These units are now subject to the Major Source Boiler MACT (40 CFR 63, Subpart DDDDD).

The furnaces have been re-classified as FURN-GRP1 (natural gas-fired furnaces). These are direct-fired units, not boilers or process heaters, and are not subject to the requirements of 40 CFR 63, Subpart DDDDD.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in The Virginian-Pilot newspaper from **Friday, February 5, 2016** to **Monday, March 7, 2016**.