



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

Huntington Ingalls Incorporated
(aka Newport News Shipbuilding)
Newport News, Virginia
Permit No. TRO-60153

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, Huntington Ingalls Incorporated (aka Newport News Shipbuilding) has applied for a Title V Operating Permit for its Newport News, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Air Permit Writer:

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Date: **May 28, 2015**

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I. FACILITY INFORMATION

Permittee

Huntington Ingalls Incorporated (formerly Northrop Grumman Shipbuilding, Inc. (NGSB))
4101 Washington Avenue
Newport News, Virginia 23607

Responsible Official

D. E. Branche
Director, Environmental, Health and Safety
(757) 380-4651

Facility

Huntington Ingalls Incorporated, aka Newport News Shipbuilding
4101 Washington Avenue
Newport News, Virginia 23607

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County-Plant Identification Number: 51-700-00013

SOURCE DESCRIPTION

NAICS Code: 336611 - Shipbuilding and Repairing

Huntington Ingalls Incorporated, also known as Newport News Shipbuilding, (formerly Northrop Grumman Shipbuilding, Inc.) owns and operates a major ship construction and overhaul facility in Newport News, Virginia. The facility is classified as a major source for criteria and hazardous air pollutant emissions from its various operations. It is, therefore, subject to Title V operating permit requirements. Products manufactured or repaired include U.S. Navy contracted aircraft carriers and submarines, as well as ships for commercial applications such as oil tankers and service ships. Services performed at the facility include all activities related to the repair, overhaul, and conversion of ships. The facility can be divided up into several operational segments as follows:

Fuel Burning Equipment - The facility operates several boilers and other pieces of combustion equipment on site. The main steam plant currently consists of three boilers fired with No. 6 fuel oil, each rated at 136.2 MMBtu/hr. The facility also has two barge-mounted boilers each rated at 213.26 MMBTU/hour, firing No. 6 fuel oil. The source was issued a minor NSR permit on December 19, 2013 (amended on March 26, 2014 and March 10, 2015) to replace the powerhouse boilers with three new natural gas-fired boilers with propane as a backup fuel and to convert the barge-mounted boilers from No. 6 fuel oil to ultra-low sulfur No. 2 distillate oil. The NSR permit also covers the installation and operation of two liquid propane vaporizers, required to gasify the propane at the rate needed for distribution to the new powerhouse boilers and other propane-fired units around the shipyard. The boiler replacement/conversion project will occur in several phases. The source also operates two small natural gas-fired steam boilers rated at 2.343 MMBtu/hr (North Yard Steam Boiler #1 and #2). These units were previously identified as insignificant emission units; however, they are now subject to the requirements of 40 CFR 63, Subpart DDDDD (Major Source Boiler MACT), so are listed in the Significant Emission Unit list. The source also operates various process heaters, which were previously identified as insignificant emission units; however, these units are also now subject to the Boiler MACT. The various hot water heaters at the source are identified in the Insignificant Emission Unit list. These units are not affected sources under the Boiler MACT. There are also ovens larger than 10 MMBTU/hr firing propane or No. 2 fuel oil which belong in the Steel Preparation and Fabrication Operations, the Foundry Operations, and Miscellaneous Activities; however, they are addressed under Fuel Burning Equipment.

Engines/Generators - The facility also operates a number of diesel-fired internal combustion engines to run emergency generators, emergency pumps, and air compressors ranging in size from around 1,500 hp to less than 100 hp.

Foundry Operations - Alloy steels, copper-nickel, aluminum, brass, and other non-ferrous alloys can be produced at the facility foundries for a full range of castings necessary for the construction/repair of ships. Foundry operations generally include the following processes: melting, casting, finishing, and sand handling. Alloying agents and fluxing materials are added to the furnaces as needed for a given casting type. The molten metal is poured into sand molds, allowed to cool, and the castings are separated from the molds at shakeout. The sand is recovered while the castings move to the finishing area. Finishing involves removal of extraneous metal by burning-off, blasting, and grinding. The facility also has a pattern shop to develop and refine the large and complex patterns for such castings as struts, rudders, stern frames, valves, compressor castings, pipes, etc. The sand handling system includes unloading of sand into storage silos, mixing of sand with resin, transferring the sand to machines for the production of molds or cores, and collecting the return sand from the shakeout area. Sand molds provide the exterior shape of the casting. Cores are used for specific internal voids (for example, recessed curves and hollow areas). The foundry uses two electric arc furnaces (EAFs) and one argon/oxygen-degassing furnace (AOD). The EAFs are permitted under a minor NSR permit dated 3/17/2011. The EAFs are subject to the Iron and Steel Foundries MACT (40 CFR 63 Subpart EEEEE). A new particulate emissions control system with a high efficiency cartridge particulate removal system (PCD ID No. 550-C1a) was installed in 2007 to comply with the MACT. Electric Arc Furnaces B and C are subject to Compliance Assurance Monitoring (CAM); however, the MACT EEEEE monitoring requirements satisfy the CAM requirements. No additional CAM requirements have been included for these units. The AOD was originally permitted on 2/24/1978. It is in the same building as the EAFs, but not subject to the MACT. The AOD and Sand Reclaim Operations were previously subject to CAM; however, the 10/17/14 NSR permit established voluntary throughput limits to keep these units out of CAM. The foundry ventilation system (Stack ID No. 550-S1) is equipped with a Dry Feed System that introduces a ferrous sulfate material

before the high efficiency cartridge filter system (PCD ID No. 550-C1a) in order to render the chromium emissions non-hazardous. An exemption letter was issued for this system on 3/2/2012. The small brass foundry uses electric induction furnaces for metal melting. This equipment is not subject to the MACT or CAM requirements. (Note: An additional emission unit called "New Sand Operations" (Ref. No. 555-E1) was previously listed in the permit as also being subject to CAM; however, it has been determined that this operation does not exhaust to the atmosphere, thus it has been removed from the permit.)

Steel Preparation and Fabrication Operations - Blasting and coating of steel units are conducted in a blast and coat facility that has computer-controlled temperature and humidity to prevent "flash rust" corrosion on freshly blasted surfaces. The steel units being blasted and coated include plates, I-beams, and other "shapes". After shot blasting the modules, the on-site rail lines carry plates to the fabrication and/or production facilities. Emissions are primarily particulate matter and are exhausted to a baghouse. In the steel fabrication facility, steel plates of varying thickness and sizes are rolled and shaped. Operations include flame cutting, grinding/shearing, cold and hot forming, planing/milling, punching/drilling, and sawing. The steel production facility is an eleven acre complex for the fabrication of structural steel, ranging from small components to complex 300-ton ship subassemblies. Operations include plate preparation, flame planers, an automated panel line, web lines, numerically controlled burning machines, flat and curved block shops, and machinery for assembly of circular hull plates. Plate preparation includes some shot blasting and heating to prepare the surface for the next step in the process, painting. Emissions are primarily particulate matter, some VOCs, and combustion by-products from ovens/furnaces.

Secondary Lead Processing - This facility makes lead shielding plates for reactor spaces and personal protection. For this process, only pure lead ingots are utilized. As permitted on 3/17/2011, there is now one lead casting furnace and a lead repair operation located within building 5471 and a lead school for training located in building 4698. Particulate and lead emissions from both buildings are controlled by a single baghouse. In addition, NNSB conducts some lead casting operations in building 250. The electric lead melting furnace, which is portable, is temporarily moved from building 5471 to building 250 for casting several lead molds at that location over a period of several days. When the lead casting operations in building 250 are complete, the furnace is returned to building 5471. At building 250, the molten lead is ladled by hand into molds, which are mounted on a portable fixture. Ventilation is accomplished by two portable lip vents positioned along either side of the mold and a portable hood placed over the melting furnace. The vents and hood vent to a dual dust collector. The dust collector is a cartridge type unit with a control efficiency of 99% or better and remains in place at building 250.

Woodworking Operations - Woodworking operations associated with the facility's primary function, shipbuilding, generally occur at three locations. Building No. 3 primarily makes pallets, boxes, and shoring timbers. Equipment used includes moulders, surfacers, saws, planers, lathes, boring machines and drills, shapers, and joiners in various sizes. The model shop is a smaller facility (2,400 square feet) used for fabrication of ships from wood, plastic, or Plexiglas. Full-scale models of these materials are used as training aids, for demonstrations, or for verification of design. Wood is also used to make some mold patterns on the second floor of Building 501 and produce pallets and shipping containers at Building 513. Particulate emissions are controlled by cyclones.

Electroplating - The source previously operated an electroplating plant which performed chrome, silver, zinc, cadmium, lead, copper, and nickel plating, chemical cleaning, pickling, stripping, buffing, and polishing. This operation was subject to 40 CFR 63 Subpart N- National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. The source notified DEQ via e-mail on April 8, 2013 that it had permanently shut down the chromium electroplating process on March 5, 2013. The source is no longer subject to the requirements of MACT Subpart N.

Painting/Coating Operations - The facility is subject to 40 CFR 63 Subpart II- National Emission Standards for Shipbuilding and Ship Repair (Surface Coating). Painting/coating operations associated with the facility's primary function, shipbuilding, occur at various locations throughout the facility. Paint booths are located in the fabrication areas and numerous shops (e.g., machine, electric, and hull outfitting). Outside painting occurs in areas such as dry docks, assembly platens, Quonset huts, in the open, under extemporaneous or semi-portable cover, inside, and outside of buildings. Brush, roller, spray, and touch-up painting applications for vessel or non-vessel related items also occur in many operational areas. Paints are generally purchased in small containers (1 to 5 gallons) and then mixed (thinned, if needed) in 5 to 10-gallon paint pots. These pots feed spray gun applicators. In Buildings 274, 275, and 1746, pressurized totes ranging in capacity from 200 to 400 gallons are used. These units are closed-loop to minimize emissions. Unit cleaning is also done in the closed-loop mode. Thinners are purchased in 55-gallon containers. By utilizing relatively small containers rather than large storage tanks, the facility can more effectively meet customer requirements and control quantities of potentially VOC and HAP-containing materials at the facility. The facility was permitted on 2/12/86 for a paint spray room with water wash curtains, associated with the aluminum flame spray facility. The facility also houses a powder coating operation in Building 205 which was initially permitted on 7/10/2000 and amended on 2/14/2001 and 9/2/2011. This unit is a closed-loop system and does not exhaust to the atmosphere. It has been included in the list of insignificant emission units.

Satellite Blast and Coat Facility - The source operates a satellite blast and coat facility for the abrasive blasting and coating of ship assemblies that are too large to house inside the main blast and coat facility. These operations were originally conducted as open, outdoor blasting and painting operations; however, the facility received an NSR permit dated 3/20/2009 to conduct the blasting and coating operations within enclosed fabric-covered shelters. This permit was last amended on 6/7/2010. Particulate emissions from these processes are controlled by portable dust collectors with high efficiency cartridge filters.

Blast and Coat Facility West - This facility is permitted under a minor NSR permit dated November 17, 2014. It is similar in design and operation to the Satellite Blast and Coat Facility (see above). Like the Satellite Blast and Coat Facility, the Blast and Coat Facility West is used for the abrasive blasting and coating of large ship assemblies. Blasting and coating operations take place within enclosed fabric-covered shelters. Particulate emissions from the abrasive blasting process are controlled by portable dust collectors with high efficiency cartridge filters. Particulate emissions from the marine coating processes are controlled by dry filters.

Specialty Shops - Machine shops are located at various locations at the facility. Work at the various machine shops involves metal cleaning, machining, and fabrication of large plates, smaller parts, pipe cutting, and similar activities. Several buildings house very large lathes and milling equipment for turning large metal plates and other large parts. Piping is fabricated and assembled at the pipe fabrication facility. Equipment includes horizontal boring mills, standard and radial drill presses, lathes, automatic welding machines, standard pipe bending machines, a variable radius pipe roller-bender, pipe threaders, etc. Metal machining and surface

preparation are also performed at the pipe fabrication facility. Electrical shops are located at several locations at the facility, manufacturing, maintaining, testing and repairing electrical equipment of all sizes. While the above operations handle metal parts, plastic components are processed by the melamine operations. Particulate emissions are exhausted to cyclones or baghouses. There are also facility-wide parts washer operations that use cleaning solvents that have been determined not subject to 40 CFR Part 63 Subpart T - National Emissions Standards for Halogenated Solvent Cleaning.

Miscellaneous Activities - Other miscellaneous activities at the source include facility-wide abrasive blasting, grit off-loading, grinding, cutting, welding/brazing, gluing, solvent usage, ship mock-ups, wastewater treatment, asbestos handling, shipboard foam installation applications, vessel cleaning, radionuclides, general plant activities (painting, welding, sandblasting, general carpentry, parts cleaning, vehicle maintenance, offset printing, blueprinting, copying, and firefighting), two gasoline service stations, and research and development activities. Facility-wide abrasive blasting, grit off-loading, and welding/brazing listed under FAC-BLAST, FAC-GRIT, and FAC-WELD, respectively, include only those activities that have to be done outside without controls. Note that the blasting units (205-B1 and 205-B2) for the powder coating operation (NSR permit dated 9/2/2011) are addressed in this section.

Also addressed here are the remediation activities which are mainly regulated by the RCRA program (FAC-REMED). Predicted VOC and HAP emissions from the Vapor Extraction System have been determined to be exempt from minor NSR permitting, as well as qualify for the exemption from MACT Subpart GGGGG except for the recordkeeping requirements in 40 CFR 63.7881(c) (2) (See VA DEQ letter dated 11/28/2007).

Storage Tanks - Storage tanks ranging in size from <1,000 gallons up to 500,000 gallons are located at the facility. Most tanks are used for storage of petroleum related materials including No. 6 fuel oil, diesel oil, waste oil, and oily wastewater. Some process related storage tanks are pressurized, e.g., varnish tanks. Totes (200 to 400 gallons), 55-gallon drums, and pots (5 to 10 gallons) are used for painting activities. One 10,000-gallon underground storage tank serves the gasoline service stations. The facility utilizes propane for heaters, dryers, and ovens. Three 30,000-gallon storage tanks and one 70,000-gallon tank are used to supply these units. Natural gas is also used in some areas of the yard and is supplied by outside commercial suppliers through trunk lines. None of the tanks are subject to NSPS Subpart Kb or 9 VAC 5-40-3410 (Rule 4-25), and all tanks qualify as insignificant activities.

The facility is a Title V major source of PM-10, NOx, SO₂, VOC, and HAPs. This source is located in an attainment area for all pollutants, and is a PSD-sized major source (though it is not currently permitted under a PSD permit). The facility began operation before 1972; hence many of the combustion equipment and process units do not have NSR permits. Nevertheless, the facility is currently permitted under several Minor NSR permits as listed below.

Minor NSR Permit Date	Permitted Equipment- Process	Comments
10/18/1979	Bayco Model BB Burn-out Oven - Specialty Shops	
2/12/1986	Aluminum flame spray facility - Painting Operations	
6/7/2010	Satellite Blast and Coat Facility	Superseded 10/8/2009 NSR, which superseded 3/20/2009 NSR
3/17/2011	Lead Foundry - Secondary Lead Processing Electric Arc Furnaces A and C - Foundry Operations	Superseded 12/16/1981 NSR
9/2/2011	Powder coating - Painting Operations	Superseded 2/14/2001 NSR, which superseded 7/10/2000 NSR
11/21/2011	Two 2,000 kW diesel emergency generators	
10/17/14	Argon/Oxygen Degassing (AOD) Furnace/Sand Reclaim Operation - Foundry Operations	Superseded 2/24/1978 NSR
11/17/14	Blast and Coat Facility West (previously known as the Supplemental Blast and Coat Facility)	Superseded 3/16/2011 NSR
3/10/15	Three powerhouse boilers/Two barge mounted boilers - Fuel Burning Equipment	Superseded 3/10/15 NSR

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on July 18, 2013. 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.

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
Fuel Burning Equipment/Steam Boilers and Liquid Propane Vaporizers							
FTSF-E1	FTSF-S1	No. 6 fuel oil-fired barge-mounted boiler, Combustion Engineering Model V2M-8, pre-1983	213.26 MMBTU/hr	Low-NOx burners (TO BE INSTALLED)	TBD	NOx	3/10/15 NSR Permit
FTSF-E2	FTSF-S2	No. 6 fuel oil-fired barge-mounted boiler, Combustion Engineering Model V2M-8, pre-1983	213.26 MMBTU/hr	Low-NOx burners (TO BE INSTALLED)	TBD	NOx	3/10/15 NSR Permit
78-E1	78-S1	No. 6 fuel oil-fired powerhouse boiler, B&W Integral Furnace, 1948	136.2 MMBtu/hr	–	–	–	3/10/15 NSR Permit
78-E2	78-S1	No. 6 fuel oil-fired powerhouse boiler, B&W Integral Furnace, 1948	136.2 MMBtu/hr	–	–	–	3/10/15 NSR Permit
78-E3	78-S1	No. 6 fuel oil-fired powerhouse boiler, B&W Integral Furnace, 1948	136.2 MMBtu/hr	–	–	–	3/10/15 NSR Permit
78-E4	TBD	Natural gas/propane-fired powerhouse boiler (TO BE INSTALLED)	99.4 MMBTU/hr	Low-NOx burners with flue-gas recirculation	TBD	NOx	3/10/15 NSR Permit
78-E5	TBD	Natural gas/propane-fired powerhouse boiler (TO BE INSTALLED)	145 MMBTU/hr	Low-NOx burners with flue-gas recirculation	TBD	NOx	3/10/15 NSR Permit

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
78-E6	TBD	Natural gas/propane-fired powerhouse boiler (TO BE INSTALLED)	145 MMBTU/hr	Low-NOx burners with flue-gas recirculation	TBD	NOx	3/10/15 NSR Permit
LPV-E1	TBD	Liquid propane vaporizer - Algas SDI, utility grade indirect fired horizontal water bath LP-gas vaporizer, Aquavaire model Q3300H (TO BE INSTALLED)	3.8 MMBtu/hr	-	-	-	3/10/15 NSR Permit
LPV-E2	TBD	Liquid propane vaporizer - Algas SDI, utility grade indirect fired horizontal water bath LP-gas vaporizer, Aquavaire model Q3300H (TO BE INSTALLED)	3.8 MMBtu/hr	-	-	-	3/10/15 NSR Permit
1744-E4	1744-S4	North Yard Steam Boiler #1 (natural gas)	2.343 MMBtu/hr	-	-	-	-
1744-E5	1744-S5	North Yard Steam Boiler #2 (natural gas)	2.343 MMBtu/hr	-	-	-	-
Process Heaters (subject to 40 CFR 63, Subpart DDDDD)							
205-E1	205-S4	Small Hot Forming Furnace (propane)	0.4 MMBtu/hr	-	-	-	-
205-E2	205-S5	Rod Furnace (propane)	0.8 MMBtu/hr	-	-	-	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
274-E2	274-S2	Binks Dryer (propane)	0.9 MMBtu/hr	-	-	-	-
274-E3	274-S3	Binks Dryer (propane)	2.4 MMBtu/hr	-	-	-	-
274-E4	274-S4	Space Heater Flat Prep Inspection (propane)	1.875 MMBtu/hr	-	-	-	-
274-E5	274-S5	Space Heater Flat Prep Inspection (propane)	0.562 MMBtu/hr	-	-	-	-
274-E6	274-S6	Space Heater Flat Prep Inspection (propane)	0.562 MMBtu/hr	-	-	-	-
274-E7	274-S7	Space Heater Flat Prep Inspection (propane)	1.88 MMBtu/hr	-	-	-	-
274-E8	274-S8	Space Heater Flat Prep Inspection (propane)	0.56 MMBtu/hr	-	-	-	-
274-E9	274-S9	Wing Heat - Space Heater Flat Prep Inspection (propane)	0.4 MMBtu/hr	-	-	-	-
274-E10	274-S10	Wing Heat - Space Heater Flat Prep Inspection (propane)	0.4 MMBtu/hr	-	-	-	-
274-E11	274-S11	Wing Heat - Space Heater Flat Prep Inspection (propane)	0.4 MMBtu/hr	-	-	-	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
550-E6	550-S6	Core Drying Oven (propane)	2.5 MMBtu/hr	–	–	–	–
4681-E1	4681-S1	Phosphate Line Bake Oven (natural gas)	4.2 MMBtu/hr	–	–	–	–
4681-E2	4681-S2	Phosphate Line Dry-Off Oven (natural gas)	4.2 MMBtu/hr	–	–	–	–
550-E15	550-S15	#3 Furnace, #39386 (propane)	1.3 MMBtu/hr	–	–	–	–
60-E4	60-S4	Curing Oven - Main Machine Shop (w/ filter) (propane)	0.175 MMBtu/hr	–	–	–	–
276-E5	276-S5	Oven (propane)	2.58 MMBtu/hr	–	–	–	–
275-E1	275-S1	Drying Oven - Shape Prep (propane)	3.2 MMBtu/hr	–	–	–	–
275-E2	275-S2	Preheat Oven - Shape Prep (propane)	1.88 MMBtu/hr	–	–	–	–
275-E3	275-S3	Preheat Oven - Shape Prep (propane)	1.88 MMBtu/hr	–	–	–	–
64-E3	64-S3	Bayco burn-out oven, Model BB-288, using propane, 1979	1.5 MMBTU/hr	Afterburner, 1 MMBTU/hr	64-C3	PM	10/18/1979 NSR Permit

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
550-E22	550-S22	#1 Furnace, #44417 (propane)	5.0 MMBtu/hr	–	–	–	–
4702-EF2	4702-S1	Paint Booth - Space Heater (propane)	1.089 MMBtu/hr	–	–	–	–
Hot Water Boilers (subject to 40 CFR 63, Subpart DDDDD)							
521-E1	521-S1	Natural gas-fired hot water boiler (24 gal tank)	2 MMBtu/hr	–	–	–	–
521-E2	521-S2	Natural gas-fired hot water boiler (24 gal tank)	2 MMBtu/hr	–	–	–	–
521-E3	521-S3	Natural gas-fired hot water boiler (24 gal tank)	2 MMBtu/hr	–	–	–	–
521-E4	521-S4	Natural gas-fired hot water boiler (24 gal tank)	2 MMBtu/hr	–	–	–	–
521-E5	521-S5	Natural gas-fired hot water boiler (24 gal tank)	2 MMBtu/hr	–	–	–	–
1877-E1	1877-S1	Natural gas-fired hot water boiler (unknown tank size)	3 MMBtu/hr	–	–	–	–
1796-E1	1796-S1	Natural gas-fired hot water boiler (24 gal tank)	2 MMBtu/hr	–	–	–	–
4678-E1	4678-S1	Natural gas-fired hot water boiler (31 gal tank)	2 MMBtu/hr	–	–	–	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
4678-E2	4678-S2	Natural gas-fired hot water boiler (31 gal tank)	2 MMBtu/hr	-	-	-	-
4678-E3	4678-S3	Natural gas-fired hot water boiler (31 gal tank)	2 MMBtu/hr	-	-	-	-
Fuel Burning Equipment - Steel Preparation and Fabrication							
276-E1	276-S1	Propane-fired oven, construction date unknown	15.3 MMBTU/hr	-	-	-	-
276-E2	276-S2	Propane-fired Ray Campbell Furnace, construction date unknown	15.4 MMBTU/hr	-	-	-	-
Fuel Burning Equipment - Foundry							
550-E8	550-S8	Propane-fired heat treating furnace # 5784	15.3 MMBTU/hr	-	-	-	-
550-E9	550-S9	Propane-fired heat treating furnace # 5302	27 MMBTU/hr	-	-	-	-
550-E13	550-S13	Propane-fired heat treating furnace #57531	12 MMBTU/hr	-	-	-	-
Fuel Burning Equipment - Miscellaneous Activities							
1278-E1	1278-S1	Annealing oven- Northside, #2 oil	20.79 MMBTU/hr	-	-	-	-
Engines/Generators							

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
GSE-10006657	–	Emergency generator, stationary, diesel Mfr Date: 1976; Install Date: 12/1/76	125 kW 108.3 hp	–	–	–	–
GSE-10006525	–	Emergency generator, stationary, diesel Mfr Date: 1976; Install Date: 12/1/76	210 kW 350 hp	–	–	–	–
GSE-10006537	–	Emergency generator, stationary, diesel Mfr Date: 1976; Install Date: 12/1/76	565 kW 805 hp	–	–	–	–
GSE-10006847	–	Emergency generator, stationary, diesel Mfr Date: 1977; Install Date: 12/1/77	210 kW 350.1 hp	–	–	–	–
GSE-10002521	–	Emergency generator, stationary, diesel Mfr Date: 1980; Install Date: 11/1/80	155 kW 258.3 hp	–	–	–	–
GSE-10002509	–	Emergency generator, stationary, diesel Mfr Date: 1980; Install Date: 11/1/80	155 kW 258.3 hp	–	–	–	–
GSE-10005521	–	Emergency generator, stationary, diesel Mfr Date: 1980; Install Date: 4/1/81	730 kW 1216.7 hp	–	–	–	–
GSE-10002704	–	Emergency generator, stationary, diesel Mfr Date: 1981; Install Date: 8/1/81	250 kW 470 hp	–	–	–	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
GSE-10003018	-	Emergency generator, stationary, diesel Mfr Date: 1982; Install Date: 9/1/82	1100 kW 1833.3 hp	-	-	-	-
GSE-10003655	-	Emergency generator, stationary, diesel Mfr Date: 1984; Install Date: 7/1/84	242 kW 375 hp	-	-	-	-
GSE-10003735	-	Emergency generator, stationary, diesel Mfr Date: 1984; Install Date: 12/1/84	500 kW 833.3 hp	-	-	-	-
GSE-10003942	-	Emergency generator, stationary, diesel Mfr Date: 1984; Install Date: 6/1/85	50 kW 82 hp	-	-	-	-
GSE-10003998	-	Emergency generator, stationary, diesel Mfr Date: 1985; Install Date: 12/1/85	30 kW 50.1 hp	-	-	-	-
GSE-10003995	-	Emergency generator, stationary, diesel Mfr Date: 1985; Install Date: 12/1/85	30 kW 50.1 hp	-	-	-	-
GSE-10003992	-	Emergency generator, stationary, diesel Mfr Date: 1985; Install Date: 12/1/85	30 kW 50.1 hp	-	-	-	-
GSE-10004007	-	Emergency generator, stationary, diesel Mfr Date: 1985; Install Date: 12/1/85	30 kW 50.1 hp	-	-	-	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
GSE-10006964	–	Emergency generator, stationary, diesel Mfr Date: 1985; Install Date: 12/1/85	30 kW 50.1 hp	–	–	–	–
GSE-10004013	–	Emergency generator, stationary, diesel Mfr Date: 1985; Install Date: 12/1/85	50 kW 83.3 hp	–	–	–	–
GSE-10006991	–	Emergency generator, stationary, diesel Mfr Date: 1985; Install Date: 12/1/85	50 kW 83.3 hp	–	–	–	–
GSE-10004005	–	Emergency generator, stationary, diesel Mfr Date: 1985; Install Date: 12/1/85	175 kW 355 hp	–	–	–	–
GSE-10004043	–	Emergency generator, stationary, diesel Mfr Date: 1985; Install Date: 12/1/85	250 kW 425 hp	–	–	–	–
GSE-10004745	–	Emergency generator, stationary, diesel Mfr Date: 1987; Install Date: 12/1/87	35 kW 58.3 hp	–	–	–	–
GSE-10004528	–	Emergency generator, stationary, diesel Mfr Date: 1987; Install Date: 12/1/87	1100 kW 1833.3 hp	–	–	–	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
GSE-10004569	–	Emergency generator, stationary, diesel Mfr Date: 1987; Install Date: 12/1/87	1100 kW 1833.3 hp	–	–	–	–
GSE-10004860	–	Emergency generator, stationary, diesel Mfr Date: 1989; Install Date: 1/1/90	35 kW 58.3 hp	–	–	–	–
GSE-7000001092	–	Emergency generator, stationary, diesel Mfr Date: 1989; Install Date: 1/1/90	1050 kW 1620 hp	–	–	–	–
GSE-10005070	–	Emergency generator, stationary, diesel Mfr Date: 1991; Install Date: 3/1/92	140 kW 268 hp	–	–	–	–
GSE-10005144	–	Emergency generator, stationary, diesel Mfr Date: 1991; Install Date: 5/1/92	350 kW 535 hp	–	–	–	–
GSE-10005145	–	Emergency generator, stationary, diesel Mfr Date: 1991; Install Date: 5/1/92	350 kW 535 hp	–	–	–	–
GSE-10008532	–	Emergency generator, stationary, diesel Mfr Date: 1997; Install Date: 1/23/98	60 kW 100 hp	–	–	–	–
GSE-10008534	–	Emergency generator, stationary, diesel Mfr Date: 1997; Install Date: 1/23/98	60 kW 100 hp	–	–	–	–
GSE-10008530	–	Emergency generator, stationary, diesel Mfr Date: 1997; Install Date: 1/23/98	60 kW 100 hp	–	–	–	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
GSE-10008531	–	Emergency generator, stationary, diesel Mfr Date: 1997; Install Date: 1/23/98	60 kW 100 hp	–	–	–	–
GSE-10008536	–	Emergency generator, stationary, diesel Mfr Date: 1997; Install Date: 1/23/98	60 kW 100 hp	–	–	–	–
GSE-10008537	–	Emergency generator, stationary, diesel Mfr Date: 1997; Install Date: 1/23/98	60 kW 100 hp	–	–	–	–
GSE-10008478	–	Emergency generator, stationary, diesel Mfr Date: 1999; Install Date: 1/1/99	400 kW 449 hp	–	–	–	–
GSE-10015352	–	Emergency generator, stationary, diesel Mfr Date: 2004; Install Date: 8/30/04	355 kW 591.7 hp	–	–	–	–
GSE-10024319	–	Emergency generator, stationary, diesel Mfr Date: 2004; Install Date: 1/1/05	100 kW 166.7 hp	–	–	–	–
GSE-10015903	–	Emergency generator, stationary, diesel Mfr Date: 2004; Install Date: 1/15/05	350 kW 583.3 hp	–	–	–	–
GSE-10018416	–	Emergency generator, stationary, diesel Mfr Date: 2006; Install Date: 1/1/07	350 kW 476 hp	–	–	–	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
GSE-10017399	–	Emergency generator, stationary, diesel Mfr Date: 2006; Install Date: 1/11/07	60 kW 100.1 hp	–	–	–	–
GSE-10018465	–	Emergency generator, stationary, diesel Mfr Date: 2005; Install Date: 2/18/07	60 kW 100 hp	–	–	–	–
PSF-10017424	–	Emergency fire pump, stationary, diesel Mfr Date: 2006; Install Date: 2/18/07	336 kW 450 hp	–	–	–	–
GSE-10018464	–	Emergency generator, stationary, diesel Mfr Date: 2005; Install Date: 2/18/07	500 kW 764 hp	–	–	–	–
GSE-10018413	–	Emergency generator, stationary, diesel Mfr Date: 2006; Install Date: 6/22/07	60 kW 100.1 hp	–	–	–	–
GSE-10018412	–	Emergency generator, stationary, diesel Mfr Date: 2006; Install Date: 6/22/07	60 kW 100.1 hp	–	–	–	–
PSE-10018737	–	Emergency pump (not fire), stationary, diesel Mfr Date: 2007; Install Date: 1/25/08	403 kW 540 hp	–	–	–	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
PSE-10018735	–	Emergency pump (not fire), stationary, diesel Mfr Date: 2007; Install Date: 1/25/08	403 kW 540 hp	–	–	–	–
GSE-10022299	–	Emergency generator, stationary, diesel Mfr Date: 2009; Install Date: 12/4/09	80 kW 133.1 hp	–	–	–	–
PSF-10022335	–	Emergency fire pump, stationary, diesel Mfr Date: 2009; Install Date: 1/31/10	160 hp	–	–	–	–
GSE-10025550	–	Emergency generator, stationary, diesel Mfr Date: 2011; Install Date: 10/15/11	2000 kW 2937 hp	–	–	–	11/21/11 NSR Permit
GSE-10025551	–	Emergency generator, stationary, diesel Mfr Date: 2011; Install Date: 10/15/11	2000 kW 2937 hp	–	–	–	11/21/11 NSR Permit
GSE-10028237	–	Emergency generator, stationary, diesel Mfr Date: 2012; Install Date: 10/9/12	300 kW 402 hp	–	–	–	–
PSF-10028208	–	Emergency fire pump, stationary, diesel Mfr Date: 2012; Install Date: 3/1/13	175 hp	–	–	–	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Foundry Operations							
550-E1	550-S1	Argon/Oxygen Degassing Furnace, Whiting Corporation	25 tons/hr	Cartridge Filter system, Donaldson Torit-Downflo Oval 4-128, 99.9% design control efficiency	550-C1a	PM	10/17/14 NSR Permit
550-E3		Electric Arc Furnace B	3 tons/hr				3/17/11 NSR Permit
550-E4		Electric Arc Furnace C	6 tons/hr				
FDFS-E1		Foundry Dry Feed System	2.2 lbs/hr				3/2/12 Exemption Letter
550-E12		Riser Burn Booth, hand torches	0.068 tons/hr				-
550-EF1	-	Charging/Tapping Operations	12.5 tons/hr	-	-	-	-
550-EF2	-	Pouring casting/Casting cooling Operation	25 tons/hr	-	-	-	-
550-EF3	-	Mold Making	N/A	-	-	-	-
550-EF5	-	Shakeout Operations	N/A	-	-	-	-
550-E20	550-S20	Steel Shot Abrasive Blasting, #5610	6 tons/hr	Cartridge Filter System, Donaldson Torit - Downflo Oval 4-48, 99.9% design control efficiency	550-C20	PM	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
550-E21	550-S21	Sawing operation, #5616	0.01 tons/hr	Cyclone, 70% design control efficiency	550-C21	PM	–
555-E11	555-S11	Sand Reclaim Operations, hopper	12.5 tons/hr	Baghouse, Standard Havens Alpha Mark III, size 24 SH, #34561, 95% design control efficiency	555-C11	PM	–
555-EF3	–	Riser Burn Area, #34561, hand torches	0.068 ton/hr	–	–	–	–
528-EF2	–	Riser Burn Area	N/A	–	–	–	–
556-EF1	–	Electric Induction Furnaces (4 each)	0.5 to 4 tons	–	–	–	–
556-EF3	–	Pouring casting/Casting cooling Operation	4 ton/hr	–	–	–	–
Steel Preparation and Fabrication Operations							
274-E1	274-S1	Abrasive Shot Blasting	2.5 tons/hr	Wheelabrator #19, Model 126D, 95% design control efficiency	274-C1	PM	–
275-E5	275-S5	Abrasive Shot Blasting	2.5 tons/hr	Pangborn C70, Type CM, 95% design control efficiency	275-C5	PM	–
276-E3PC	Building vents	Plasma Cutting	–	–	–	–	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
288-E1	288-S1	Abrasive Blasting- Steel shots	2.5 tons/hr	RF Cox Associates baghouse, 95% design control efficiency	288-C1	PM	–
288-E2	288-S2	Abrasive Blasting- Steel shots	2.5 tons/hr	RF Cox Associates baghouse, 95% design control efficiency	288-C2	PM	–
288-E3	288-S3	Abrasive Blasting- Steel shots	2.5 tons/hr	RF Cox Associates baghouse, 95% design control efficiency	288-C3	PM	–
Secondary Lead Processing							
4582-E12	4582-S2	One (1) Lead Casting Furnace and Lead Repair Operation, located in building 5471	4.7 tons/hr	Baghouse, Standard Havens Alpha Mark III 18, 99.0% design control efficiency	4582-C2	PM	3/17/11 NSR Permit
4582-E12		Additional operating location of Unit #4582-E12 at Bldg 250	4.7 tons/hr				
LS-E1	4582-S2	Lead School (for training) with 3 work stations, located in building 4698	0.05 tons/hr				
Wood Working							
3-E1	3-S1	Cutting/Planer/Re-saw	–	Cyclone, 90.0% design control efficiency	3-C1	PM	–
501-E2	501-S2	Foundry Pattern Shop - wood cutting machines	–	Cyclone, 90.0% design control efficiency	501-C2	PM	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
513-E1	513-S1	Warehouse No. 6 Saws	–	Cyclone, 90.0% design control efficiency	513-C1	PM	–
Painting Operations							
Painting Operations/Group P-X33							
232-E1 through E6	232-S1 through S6	Consolidated Paint Facility, 2 banks of 3 paint booths each (6 total)	–	Binks Dynaprecipitator, water wash curtain, 98% design control efficiency	232-C1 through C6	PM-10	–
4681-E3	4681-S3	Metal Finishing Bldg, paint booth, manual	–	Greenline Corporation, water wash curtain, 98% design control efficiency	4681-C2	PM-10	–
4681-E4	4681-S4	Metal Finishing Bldg, paint booth (Zn phosphate coating line), automated	–	Greenline Corporation, water wash curtain, 98% design control efficiency	4681-C3	PM-10	–
4701-E10	4701-S10	Aluminum Wire Flame Spray booth, manual	–	Global Finishing Solutions water wash curtains, 98% design control efficiency	4701-C10	PM-10	2/12/86 NSR Permit
4701-E11	4701-S11	Aluminum Wire Flame Spray booth, manual	–	Global Finishing Solutions water wash curtains, 98% design control efficiency	4701-C11	PM-10	2/12/86 NSR Permit
4701-E12	4701-S12	Flame Spray Facility paint booth, north unit, manual	–	Global Finishing Solutions water wash curtains, 98% design control efficiency	4701-C12	PM-10	2/12/86 NSR Permit

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
4701-E13	4701-S13	Flame Spray Facility paint booth, south unit, manual	–	Global Finishing Solutions water wash curtains, 98% design control efficiency	4701-C13	PM-10	2/12/86 NSR Permit
4702-E1	4702-S1	Paint Spray Bldg, antenna paint booth	–	Filter (paper), JBI Automatic Spray Booth, 90% design control efficiency	4702-C1	PM-10	–
4730-NP	4730-NPFE	Grit Blast & Paint Facility, North Paint Room	–	Filter (paper), 90% design control efficiency	4730-NPC	PM-10	–
4730-SP	4730-SPFE	Grit Blast & Paint Facility, South Paint Room	–	Filter (paper), 90% design control efficiency	4730-SPC	PM-10	–
60-E5	–	Engraving	–	–	–	–	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Painting Operations/P-SHIPSPRAY							
P-SHIPSPRAY	–	Outside Vessel Painting- manual spray painting	–	–	–	–	–
Painting Operations/P-SHIPBRUSH							
P-SHIPBRUSH	–	General facility-wide marine coating operations, brush, roller, and touch-up application on vessels and vessel parts- manual brush painting	–	–	–	–	–
Painting Operations/Powder Coating Operation							
205-C1a 205-C1b 205-C1c	205-C1aS 205-C1bS 205-C1cS	Parts Washer with three burners, natural gas-fired, Eclipse Imersojet IJ6	One burner rated at 2.0 MMBTU/hr and two burners rated at 1.3 MMBTU/hr each	–	–	–	9/2/11 NSR Permit
205-C2	205-C2S	Preheat oven, natural gas-fired, Eclipse AH520	Burner and evaporator rated at 5.5 MMBTU/hr	–	–	–	9/2/11 NSR Permit

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
205-C3	205-C3S	Cure oven, , natural gas-fired, Eclipse AH520	Burner and evaporator rated at 5.5 MMBTU/hr	–	–	–	9/2/11 NSR Permit
206-C1	206-C1S	Heat cleaning oven, propane-fired, Steelman Model 4.56.54 BA-C	0.6 MMBTU/hr	Direct Flame Afterburner, 99.0% design control efficiency	206-C1C	VOC	9/2/11 NSR Permit
Painting Operations/Group P-X15							
274-E13	274-S13	Plate Preparation & Inspection, paint booth	–	Dry filter (paper), 90% design control efficiency	274-C13	PM-10	–
275-E4 and 275-E6	275-S4 and 275-S6, resp.	Shape Preparation, paint booths (two)	–	Dry filter (paper), 90% design control efficiency	275-C4 and 275-C6, resp.	PM-10	–
Painting Operations/Group P-FAC							
P-FAC	–	General facility-wide non-vessel brush, roller, spray and touch-up painting operations- manual brush and spray painting	–	–	–	–	–
103-E2	103-S2	Maintenance Shop, paint booth	–	Filter (paper), 90% design control efficiency	103-C2	PM-10	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Satellite Blast and Coat Facility							
SBF-E1	SBF-S1	Abrasive blasting process equipment, located in an enclosed fabric-covered shelter, custom design	18,000 lbs/hr	Portable dust collectors w/ high efficiency cartridge filters, 99% design control efficiency	SBF-C1	PM/PM-10	6/7/10 NSR Permit
SPF-E1	SPF-S2	Marine coating process equipment, located in an enclosed fabric-covered shelter, custom design	76.8 gal coating/hr	Portable dust collectors w/ high efficiency cartridge filters, 99% design control efficiency	SPF-C1	PM/PM-10	6/7/10 NSR Permit
Blast and Coat Facility West							
4730-SBCF-E1	4730-SBCF-S1	Abrasive blasting process equipment, located in an enclosed fabric-covered shelter, custom design	18,000 lbs/hr	Portable dust collectors w/ high efficiency cartridge filters, 99.999% design control efficiency	4730-SBCF-C1	PM/PM-10	11/17/14 NSR Permit
4730-SBCF-E2	4730-SBCF-S2	Marine coating process equipment, located in an enclosed fabric-covered shelter, custom design	96 gal coating/hr	Dry filters, 99% control efficiency	4730-SBCF-C2	PM/PM-10	11/17/14 NSR Permit
4730-SBCF-E3	4730-SBCF-S3	Marine coating process equipment, located in an enclosed fabric-covered shelter, custom design	96 gal coating/hr	Dry filters, 99% control efficiency	4730-SBCF-C3	PM/PM-10	11/17/14 NSR Permit
Specialty Shops							
64-E1	64-S1	Electrical Shop drill press/sander (not used for wood)	–	Cyclone, 90% design control efficiency	64-C1	PM	–
64-E9		Grinding metal	–			PM	–
64-E2	64-S2	Electrical Shop saw	–	Baghouse, 95% design control efficiency	64-C2	PM	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
60-E2	60-S2	Grinding operations	–	Cartridge filters Donaldson Torit Downflow DFO3-12, 99% design control efficiency	60-C2	PM	–
114-E1	114-S1	Saw metals	–	Cartridge filters Donaldson Torit Downflow 2DF8, #40859, 99% design control efficiency	114-C1	PM	–
4896-E1	4896-S1	Melamine Operations (2 Milling Machines, Band Saw, and Lathe)	–	Dust collector, Donaldson Torit Model 90-219-5, 99% control efficiency	4896-C1	PM	–
FAC-PW	Building vents	Facility-wide parts- washer operations	–	–	–	–	–
Miscellaneous Activities							
FAC-BLST	–	External abrasive blasting - facility- wide	–	–	–	–	–
FAC-GRIT	–	Utility grit off-loading	–	–	–	–	–
50-E1	50-S1	Wheelabrator #11980 Table Blast Unit -Abrasive blasting/steel shots	2.5 tons/hr	Cartridge filters, Torit Ultraweb Downflow II DFT3-12, 99% design control efficiency	50-C1	PM	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
4730-NB	4730-NR (Northside Reclaim)	Abrasive blasting/steel shot - North Blast Room	–	Torit Ultraweb Cartridge Dust collector, 99.0% design control efficiency	4730-NRC	PM	–
	4730-NLE (Northside Local Exhaust)		–	Torit Ultraweb Cartridge Dust collector, 99.0% design control efficiency	4730-NLC	PM	–
4730-SB	4730-SR (Southside Reclaim)	Abrasive blasting/steel shot - South Blast Room	–	Torit Ultraweb Cartridge Dust collector, 99.0% design control	4730-SRC	PM	–
	4730-SLE (Southside Local Exhaust)		–	Torit Ultraweb Cartridge Dust collector, 99.0% design control efficiency	4730-SLC	PM	–
201-E1	201-S1	Abrasive blasting/steel shot (10/1970), Wheelabrator #7614	2.5 tons/hr	Cartridge filters Torit UltraWeb Downflow DFO3-12, 99% design control efficiency	201-C1	PM	–
PORT-DC	Various	Various portable dust collectors for abrasive blasting and welding operations.	–	Various portable dust collectors	Various	PM	–
4701-E1	4701-S1	Abrasive blasting/steel grit, garnet, aluminum oxide	384 lbs/hr	Baghouse, MISCO/IPEC custom-made units, 95 % design control efficiency	4701-C1	PM	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
1768-E1	1768-S1	Grinding/cutting/welding - Welding School	-	Cyclone, Torit, 90 % design control efficiency	1768-C1	PM	-
FAC-BLAST	-	Abrasive blasting - facility-wide	-	-	-	-	-
FAC-WELD	-	Welding - facility-wide	-	-	-	-	-
FAC-GLUE	-	Gluing operations - facility-wide	-	-	-	-	-
FAC-SOLV	-	Solvent/thinner usage - facility-wide	-	-	-	-	-
SS-E1	-	Service station - gasoline	-	-	-	-	-
SS-E2	-	Service station - diesel	-	-	-	-	-
5-E2	5-S2	Wheelabrator /Tumblast Machine (Blast Unit)- Abrasive Blasting /steel shots	2.5 tons/hr	Baghouse, Wheelabrator Dustube Model 112-AC, 95.0% design control efficiency	5-C2	PM	-
205-B1	205-S1	Powder coating steel shot blast unit	-	Baghouse, Wheelabrator USF 44, design control efficiency 95%	205-BC1	PM	9/2/11 NSR Permit

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
205-B2	205-S2	Powder coating steel shot blast unit	–	Baghouse, Pangborn Model 25-5-8, Type HP-1, design control efficiency 95%	205-BC2	PM	9/2/11 NSR Permit
FAC-REMEDIATION	–	HAP contained in remediation materials removed during all site remediation, as defined in 40 CFR §63.7657	–	–	–	–	–

Changes to the equipment list:

The Pollution Control Device (PCD) descriptions for the low-NOx burners to be added to boilers FTSF-E1 and FTSF-E2 have been included.

The size/rated capacities for the existing powerhouse boilers 78-E1, 78-E2, and 78-E3 have been corrected.

The new powerhouse boilers (78-E4, 78-E5, and 78-E6) and liquid propane vaporizers (LPV-E1 and LPV-E2) have been included (to be installed).

Boilers 1744-E4 and 1744-E5 have been moved from the Insignificant Emission Unit list. These units are now subject to 40 CFR 63, Subpart DDDDD (Major Source Boiler MACT).

Process heaters 205-E1, 274-E2, 274-E3, 274-E4, 274-E5, 274-E6, 274-E7, 274-E8, 274-E9, 274-E10, 274-E11, 550-E6, 4681-E1, 550-E15, 60-E4, 276-E5, 275-E1, 275-E2, 275-E3, 550-E22, and 4702-EF2 have been moved from the Insignificant Emission Unit list. These units are now subject to 40 CFR 63, Subpart DDDDD (Major Source Boiler MACT).

Process heaters 205-E1 and 4681-E2 have been added to the equipment list. These units were previously unaccounted for and are now subject to 40 CFR 63, Subpart DDDDD (Major Source Boiler MACT).

Hot water boilers 521-E1, 521-E2, 521-E3, 521-E4, 521-E5, 1877-E1, 1796-E1, 4678-E1, 4678-E2, and 4678-E3 have also been moved from the Insignificant Emission Unit list. These units are hot water boilers, each with a rated capacity greater than 1.6 MMBtu/hr, therefore, they are also now subject to 40 CFR 63, Subpart DDDDD (Major Source Boiler MACT).

Unit 550-E10 (Abrasive Saw #5453) has been moved to the list of insignificant emission units. The PTE of PM for this unit is less than 5 tons/yr.

The list of generators/engines has been updated to include all units at the source. The Unit Reference Numbers for all stationary units have been changed, at the facility's request. The equipment descriptions and ratings have been updated, based on the information outlined in the source's Title V renewal application. The manufacture and installation dates have also been added for all stationary engines/generators to help aid in the determination of their applicability to NSPS IIII and MACT ZZZZ.

The references to CAM for units 550-E1 and 555-E11 have been removed.

Unit 550-EF3 has been added.

Unit 528-EF1 has been removed. This unit is a small glove box unit that has no exterior exhaust to the atmosphere, therefore, it is not a regulated emission unit.

Units 556-EF2, 1746-E1, 276-E3, 288-E4, 1746-E4, 17-E20, ALC-E1, and 175-E1 have been removed. These units no longer exist at the facility.

Unit Reference Numbers Port-E1, Port-E2 through Port E-3, Port E4 through Port E-24, Port E-25, and Port-E26 through Port-E31 have been removed. These Unit Reference Numbers have been eliminated. All abrasive blasting operations venting to portable dust collectors are now grouped as PORT-DC.

Unit 250-E1 has been removed. This unit is the same emission unit as 4582-E12 when operating at Building 250.

Units 263-E1 and 4677-E1 have been removed. These units no longer exist at the facility. All fugitive welding emissions yard-wide are now covered under FAC-WELD. All fugitive abrasive blasting emissions yard-wide are now covered under FAC-BLST. If welding fumes are ventilated through a portable dust collector, emissions will be through Unit Reference Number PORT-DC.

The chromium electroplating equipment (PLATE-E1, PLATE-E2, and PLATE-E3) has been removed. The source notified DEQ via e-mail on April 8, 2013 that the chromium electroplating process had been permanently shut down on March 5, 2013. The associated permit conditions (previously Section IX of the permit) have also been removed).

Paint booths 4681-E2 and 4681-E3 (Metal Finishing Bldg paint booth, manual and Metal Finishing Bldg paint booth, automated) have been re-numbered 4681-E3 and 4681-E4.

The description of unit SS-E2 has been changed from "Service station - gasoline" to "Service station - diesel."

The operation previously labeled "Site Remediation Activities" has been re-named FAC_REMED. A description of the operation has also been included for clarity.

EMISSIONS INVENTORY

A copy of the 2013 emissions report is attached. Emissions are summarized in the following tables.

2013 Actual Emissions

	2013 Criteria Pollutant Emission in Tons/Year					
	VOC	CO	SO ₂	PM ₁₀	PM _{2.5}	NOx
Total	296.845	27.189	1,000.444	106.843	15.312	402.829

2013 Facility Hazardous Air Pollutant Emissions

Pollutant	2013 Hazardous Air Pollutant Emissions in Tons/Yr
Ammonia (NH ₃)	3.141
Lead (Pb)	0.007
Manganese Compounds (MNC)	0.253
Methyl Chloroform (TCA)	0.496

III. EMISSION UNIT APPLICABLE REQUIREMENTS - Boiler Requirements - Small Boilers and Process Heaters - 1744-E4, 1744-E5, 205-E1, 205-E2, 274-E2, 274-E3, 274-E4, 274-E5, 274-E6, 274-E7, 274-E8, 274-E9, 274-E10, 274-E11, 550-E6, 4681-E1, 4681-E2, 550-E15, 60-E4, 276-E5, 275-E1, 275-E2, 275-E3, 64-E3, 550-E22, 4702-EF2, 276-E1, 276-E2, 550-E8, 550-E9, 550-E13, and 1278-E1

Limitations

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

9 VAC 5-40-900	Emission Standards for Fuel Burning Equipment - Standard for Particulate Matter (Rule 4-8)
9 VAC 5-40-930	Emission Standards for Fuel Burning Equipment - Standard for Sulfur Dioxide (Rule 4-8)
9 VAC 5-40-940	Emission Standards for Fuel Burning Equipment - Standard for Visible Emissions (Rule 4-8)
9 VAC 5-60-90	EPA Maximum Achievable Control Technology Standards (General)
9 VAC 5-60-100	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 DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
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The applicable limitations from Rule 4-8 are included in the table at the beginning of Section III.A.

The applicable limitations from MACT DDDDD are included in Condition 2.

Testing and Monitoring

Periodic monitoring requirements which meet the requirements of Part 70 are outlined in Conditions 3 and 4.

Condition 3 requires the source to maintain records of the throughput, type of fuel used, and appropriate data on fuel properties for units 276-E1, 276-E2, 550-E8, 550-E9, 550-E13, and 1278-E1. The permittee shall calculate emissions of SO₂ and PM-10 in pounds per million BTU daily using daily fuel throughputs, fuel sulfur contents, and appropriate emission factors from the current AP-42. In lieu of a daily calculation, the permittee may make a one-time demonstration of maximum potential SO₂ and PM-10 emissions in pounds per million BTU using maximum fuel throughput, fuel sulfur content, and appropriate emission factors from AP-42, 5th Edition. The permittee shall maintain records of daily calculations for the most recent 5-year period. If the one-time maximum emission demonstration option is chosen, the permittee shall maintain a record of such a demonstration for the life of the affected units. The source has chosen the one-time demonstration option and maintains the required records.

Condition 4 requires that the source perform monthly visible emissions observations on each boiler stack for units 276-E1, 276-E2, 550-E8, 550-E9, 550-E13, and 1278-E1. 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. The source is required to maintain records of all visible emissions observations/VEEs.

The applicable testing and monitoring requirements from MACT DDDDD are included in Condition 5.

Notifications, Recordkeeping, and Reporting

Condition 6 requires the source to maintain records of all required visible emissions evaluations and/or observations and all required emissions calculations for units 276-E1, 276-E2, 550-E8, 550-E9, 550-E13, and 1278-E1. If a one-time emissions calculation is performed to demonstrate compliance with the SO₂ and PM-10 limitations outlined in this section, the permittee shall maintain a record of such demonstration for the life of the affected units.

The applicable notification, recordkeeping, and reporting requirements from MACT DDDDD are included in Condition 7.

IV. EMISSION UNIT APPLICABLE REQUIREMENTS - Boiler Requirements - FTSE-E1, FTSE-E2, 78-E2, 78-E2, 78-E3, 78-E4, 78-E5, and 78-E6

Limitations - Phased Fuel Conversion/Boiler Replacement

The following limitations are derived from the New Source Review permit issued March 10, 2015:

Condition 8 (NSR Condition 10, 13, and 14): Fuel Specifications, Process Emission Limits,
Visible Emission Limit

Condition 9 (NSR Condition 6): Phased Fuel Conversion

Condition 10 (NSR Condition 7): Phased Boiler Replacement

Condition 11 (NSR Condition 8): Fuel

Condition 12 (NSR Condition 9): Fuel

Condition 13 (NSR Condition 11): Heat Input Limitation - Total

Condition 14 (NSR Condition 12): Heat Input Limitation - Barge-Mounted Boilers

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

9 VAC 5-40-900 Emission Standards for Fuel Burning Equipment - Standard for Particulate Matter
(Rule 4-8)

9 VAC 5-40-930 Emission Standards for Fuel Burning Equipment - Standard for Sulfur Dioxide
(Rule 4-8)

9 VAC 5-40-80 Standard for Visible Emissions for Existing Stationary Sources

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

40 CFR 63, Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources:
Industrial, Commercial, and Institutional Boilers and Process Heaters

The applicable limitations from Rule 4-8 are included in the table at the beginning of Section IV.A.

The applicable limitations from MACT DDDDD are included in Condition 15.

Testing and Monitoring - Phased Fuel Conversion/Boiler Replacement

Periodic monitoring requirements which meet the requirements of Part 70 are outlined in Conditions 16 and 17.

Condition 16 requires the source to maintain records of the throughput, type of fuel used, and appropriate data on fuel properties for units FTSE-E1, FTSE-E2, 78-E1, 78-E2, and 78-E3. The permittee shall calculate emissions of SO₂ and PM-10 in pounds per million BTU daily using daily fuel throughputs, fuel sulfur contents, and appropriate emission factors from the current AP-42. In lieu of a daily calculation, the permittee may make a one-time demonstration of maximum potential SO₂ and PM-10 emissions in pounds per million BTU using maximum fuel throughput, fuel sulfur content, and appropriate emission factors from AP-42, 5th Edition. The permittee shall maintain records of daily calculations for the most recent 5-year period. If the one-time maximum emission demonstration option is chosen, the permittee shall maintain a record of such a demonstration for the life of the affected units. The source has chosen the one-time demonstration option and maintains the required records.

Condition 17 requires that the source perform monthly visible emissions evaluations in accordance with EPA Method 9 on each boiler stack for units 78-E1, 78-E2, and 78-E3 to determine compliance with the opacity limit in the table at the beginning of Section IV.A. The source is required to maintain records of VEEs in accordance with EPA Method 9.

The applicable testing and monitoring requirements from MACT DDDDD are included in Condition 18.

Notifications, Reporting, and Recordkeeping - Phased Fuel Conversion/Boiler Replacement

Condition 19 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Records of all No. 6 fuel oil shipments purchased, indicating sulfur content per shipment.
- b. Monthly heat input records for the barge-mounted boilers (Ref. Nos. FTSF-E1 and FTSF-E2) and all boilers, combined (Ref. Nos. FTSF-E1, FTSF-E2, 78-E1, 78-E2, and 78-E3).

Condition 20 requires the source to maintain records of all required visible emissions evaluations and/or observations for units 78-E1, 78-E2, and 78-E3 and all required emissions calculations for units FTSF-1, FTSF-2, 78-E1, 78-E2, and 78-E3. If a one-time emissions calculation is performed to demonstrate compliance with the SO₂ and PM-10 limitations outlined in this section, the permittee shall maintain a record of such demonstration for the life of the affected units.

The applicable notification, reporting, and recordkeeping requirements from MACT DDDDD are included in Condition 21.

Limitations - Post-Modification/Replacement

The following limitations are derived from the New Source Review permit issued March 10, 2015:

- Condition 22 (NSR Condition 27, 28, 29, 30, 31, and 32): Process Emission Limits, Visible Emission Limits
- Condition 23 (NSR Condition 16): Heat Input Limitation
- Condition 24 (NSR Condition 17): Fuel
- Condition 25 (NSR Condition 18): Fuel
- Condition 26 (NSR Condition 19): Fuel
- Condition 27 (NSR Condition 20): Fuel
- Condition 28 (NSR Condition 21): Fuel Certification
- Condition 29 (NSR Condition 22): Emission Controls
- Condition 30 (NSR Condition 23): Emission Controls
- Condition 31 (NSR Condition 24): Emission Controls
- Condition 32 (NSR Condition 25): Emission Controls
- Condition 33 (NSR Condition 26): Emission Controls

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

- 9 VAC 5-50-80 Standard for Visible Emissions for New and Modified Stationary Sources
- 9 VAC 5-50-260 BACT Standard for New and Modified Stationary Sources
- 9 VAC 5-50-400 EPA New Source Performance Standards (General)
- 9 VAC 5-50-410 EPA New Source Performance Standards (Designated standards of performance)
- 9 VAC 5-60-90 EPA Maximum Achievable Control Technology Standards (General)
- 9 VAC 5-60-100 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 Db Standards of Performance for Industrial, Commercial, Institutional Steam Generating Units
- 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 applicable limitations from NSPS Db are included in the table at the beginning of Section IV.D.

The applicable limitations from MACT DDDDD are included in Condition 34.

Testing and Monitoring - Post-Modification/Replacement

Periodic monitoring requirements which meet the requirements of Part 70 are outlined in Condition 35. This condition requires that the source perform monthly visible emissions observations on each boiler stack for units FTSF-E1, FTSF-E2, 78-E4, 78-E5, and 78-E6. 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. The source is required to maintain records of all visible emissions observations/VEEs.

The applicable testing and monitoring requirements from NSPS Db are included in Condition 36.

The applicable testing and monitoring requirements from MACT DDDDD are included in Condition 37.

The testing requirements from the March 26, 2014 NSR permit (NSR Condition 5) are included in Condition 38.

If testing is conducted in addition to the monitoring specified in the permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ (Condition 39).

Notifications, Reporting, and Recordkeeping - Post-Modification/Replacement

Condition 40 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Annual heat input of all boilers (Ref. Nos. FTSE-E1, FTSE-E2, 78-E4, 78-E5, and 78-E6) and the liquid propane vaporizers (Ref. Nos. LPV-E1 and LPV-E2), combined (in MMBtu/yr), 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. Monthly heat input shall be calculated by multiplying the monthly metered natural gas or distillate oil usage by the DEQ-approved heating value of the fuels (1,020 Btu/scf for natural gas and 140,000 Btu/gal for distillate oil).
- b. All fuel supplier certifications.

The initial notification requirements from the March 26, 2014 NSR Permit (NSR Condition 34) are included in Condition 41.

The applicable notification, reporting, and recordkeeping requirements from NSPS Dc are included in Condition 42.

The applicable notification, reporting, and recordkeeping requirements from NSPS Db are included in Condition 43.

The applicable notification, reporting, and recordkeeping requirements from MACT DDDDD are included in Condition 44.

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

Limitations

The following limitations are derived from the New Source Review permit issued November 21, 2011:

- Condition 45 (NSR Conditions 5, 7, and 8): Fuel, Process Emission Limits, Visible Emission Limit
- Condition 46(NSR Condition 3): Operating Hours
- Condition 47 (NSR Condition 4): Fuel
- Condition 48 (NSR Condition 5): Fuel
- Condition 49 (NSR Condition 6): Fuel Certification

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

- 9 VAC 5-50-80 Standard for Visible Emissions for New and Modified Stationary Sources
- 9 VAC 5-50-400 EPA New Source Performance Standards (General)
- 9 VAC 5-50-410 EPA New Source Performance Standards (Designated standards of performance)
- 9 VAC 5-60-90 EPA Maximum Achievable Control Technology Standards (General)
- 9 VAC 5-60-100 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 applicable limitations, monitoring, recordkeeping, and reporting requirements from NSPS IIII are included in the table at the beginning of Section V.A and Condition 50.

The applicable limitations, monitoring, recordkeeping, and reporting requirements from MACT ZZZZ are included in the table at the beginning of Section V.A and Conditions 51 through 55.

Monitoring

Periodic monitoring requirements which meet the requirements of Part 70 are outlined in Condition 56. This condition requires that the source perform monthly visible emissions observations on each emergency generator exhaust for units GSE-44550 and GSE-44551. 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. The source is required to maintain records of all visible emissions observations/VEEs.

Recordkeeping

Condition 57 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Annual hours of operation of each emergency generator (Ref. Nos. GSE-44550 and GSE-44551), 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. All fuel supplier certifications.

VI. EMISSION UNIT APPLICABLE REQUIREMENTS - Foundry Operations Requirements - (See table in Section VI.A of Title V permit for Emission Unit ID's)

Limitations

The following limitations are derived from the New Source Review permit dated October 17, 2014:

Condition 58 (NSR Conditions 12, 13, 14, and 15): Process Emission Limits and Visible Emission Limits

Condition 59 (NSR Condition 3): Emission Controls

Condition 60 (NSR Condition 4): Emission Controls

Condition 62 (NSR Condition 10): Throughput

Condition 63 (NSR Condition 11): Throughput

The following limitations are derived from the New Source Review permit dated March 17, 2011:

Condition 58 (NSR Conditions 10 and 12): Process Emission Limits and Visible Emission Limit

Condition 61 (NSR Condition 4): Emission Control

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

9 VAC 5-40-2410	Emission Standards For Primary And Secondary Metal Operations - Standard for Particulate Matter (Rule 4-18)
9 VAC 5-40-2430	Emission Standards For Primary And Secondary Metal Operations - Standard for Visible Emissions (Rule 4-18)
9 VAC 5-50-80	Standard for Visible Emissions for New and Modified Stationary Sources
9 VAC 5-40-80	Standard for Visible Emissions for Existing Stationary Sources
9 VAC 5-50-260	BACT Standard for New and Modified Stationary Sources

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

40 CFR 63, Subpart EEEEE	National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries
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The applicable limitations from MACT EEEE and Rule 4-18 are included in the table at the beginning of Section VI.A.

The applicable requirements for unit 550-E10 (Abrasive Saw) have been removed. This unit has been determined to be an insignificant unit.

Monitoring

The monitoring requirements from the March 17, 2011 NSR permit are included in Conditions 64 through 66 and 71 (NSR Conditions 5, 6, 7, and 9).

The monitoring requirements from the October 17, 2014 NSR permit are included in Conditions 64 through 69 (NSR Conditions 5, 6, 7, 8, 9, and 16).

Additional periodic monitoring requirements which meet the requirements of Part 70 are outlined in Condition 70. This condition requires that the source perform monthly visible emissions observations on the stack of the Steel Shot Abrasive Blasting Operation. 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. The source is required to maintain records of all visible emissions observations/VEEs.

The applicable monitoring requirements from MACT EEEEE are included in Conditions 71 through 76.

The CAM requirements for units 550-E1 (Argon/Oxygen Degassing (AOD) Furnace) and 555-E11 (Sand Reclaim Operation) have been removed. An NSR permit was issued on 11/17/14 to establish voluntary throughput limits on these operations in order to eliminate the need for Compliance Assurance Monitoring.

Recordkeeping and Reporting

Condition 77 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Annual throughput of metal to the Argon/Oxygen Degassing (AOD) Furnace (Ref. No. 550-E1), 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. Annual throughput of sand to the Sand Reclaim Operation (Ref. No. 555-E11), 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. Operation and control device monitoring records for the cartridge filter system (PCD ID No. 550-C1a) and the fabric filter for the Sand Reclaim Operation (PCD ID No. 555-C11), as required by Conditions 65 and 68.
- d. For the stack of the Argon/Oxygen Degassing (AOD) Furnace and Foundry Dry Feed System (Stack No. 550-S1), visible emission evaluation records in accordance with Method 9 (40 CFR 60 Appendix B).
- e. For the stack of the Steel Shot Abrasive Blasting Operation (Stack No. 550-S20), visible emission observations, and if VEE is performed, records in accordance with Method 9 (40 CFR 60 Appendix B).
- f. Copies of all required notifications.
- g. Copies of all required reports.
- h. All required opacity and PM performance test results.
- i. Records specified in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

- j. Records of the times the cartridge leak detection system alarm sounded, and for each valid alarm, the time you initiated corrective action, the corrective action taken, and the date on which corrective action was completed (40 CFR 63.7743(c)(2)).
- k. Records of all inspections and maintenance of the cartridge filter system as required by 40 CFR 63.7740(c), including all information needed to document conformance with these requirements (40 CFR 63.7743(c)(1)).
- l. Records that document continuous compliance with the work practice standards in 40 CFR 63.7700(b) (40 CFR 63.7744(a)).
- m. Records of monthly inspections, preventive maintenance, site-specific bag leak detection system monitoring, and corrective action to document conformance with the requirements of the O&M Plan (40 CFR 63.7745(a)).
- n. A current copy of the O&M Plan shall be available for inspection upon request. The plans must be kept for the life of the foundry or until the foundry is no longer subject to the requirements of 40 CFR 63 Subpart EEEEE (40 CFR 63.7745(b)).

Testing

The applicable testing requirements from MACT EEEEE are included in Conditions 78 through 81.

The source is required to be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations (Condition 82).

If testing is conducted in addition to the monitoring specified in the permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ (Condition 83).

Notifications and Reporting

The applicable notification and reporting requirements from MACT EEEEE are included in Conditions 84 through 86.

**VII. EMISSION UNIT APPLICABLE REQUIREMENTS - Steel Preparation and Fabrication Requirements -
(See table in Section VII.A of Title V permit for Emission Unit ID's)**

Limitations

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

9 VAC 5-40-260	Emission Standards for General Process Operations - Standard for Particulate Matter (Rule 4-4)
9 VAC 5-40-320	Emission Standards for General Process Operations - Standard for Visible Emissions (Rule 4-4)

The applicable limitations from Rule 4-4 are included in the table at the beginning of Section VII.A.

Units 1746-E1, 276-E3, and 288-E4 have been removed from the table at the beginning of Section VII.A. These units are no longer at the facility.

Monitoring

Periodic monitoring requirements which meet the requirements of Part 70 are included in Condition 88. The source is required to perform monthly visible emissions evaluations in accordance with EPA Method 9 on each unit listed in the table at the beginning of Section VII.A to determine compliance with the opacity limit. The source is required to maintain records of VEEs in accordance with EPA Method 9.

Recordkeeping

Condition 89 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Annual throughput of abrasive blast media (in tons) and hours of operation for each of the Steel Preparation and Fabrication Operations activities listed in Table VI.A. The abrasive blast media throughput (in tons) and hours of operation shall be recorded and maintained in a logbook for each calendar month such that the annual amounts can be calculated monthly as the sum of each consecutive 12-month period.
- b. Visible emission evaluations (VEE) records in accordance with Method 9 (40 CFR 60 Appendix B).

Testing

If testing is conducted in addition to the monitoring specified in the permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ (Condition 90).

VIII. EMISSION UNIT APPLICABLE REQUIREMENTS - Secondary Lead Processing Requirements - (4582-E12 and LS-E1)

Limitations

The following limitations are derived from the New Source Review permit dated March 17, 2011:

- Condition 91 (NSR Condition 11): Visible Emission Limits
- Condition 92 (NSR Condition 3): Emission Controls
- Condition 93 (NSR Condition 8): Throughput

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

- 9 VAC 5-50-80 Standard for Visible Emissions for New and Modified Stationary Sources

Monitoring

Periodic monitoring requirements which meet the requirements of Part 70 are included in Conditions 94. This condition requires that the source perform weekly visible emissions observations on the stack of the Steel Shot Abrasive Blasting Operation. 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. The source is required to maintain records of all visible emissions observations/VEEs.

The permit previously contained a monitoring requirement for monthly records of the throughput of lead processed (in tons); however, this requirement is now covered under the recordkeeping requirements, thus this monitoring requirement has been removed.

Recordkeeping

Condition 95 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Annual throughput of lead (in tons) for the Secondary Lead Processing units (Unit Ref. Nos. 4582-E12 and LS-E1), 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. Weekly visible emissions observations, visible emissions evaluations (if performed), and any corrective action taken.

Testing

If testing is conducted in addition to the monitoring specified in the permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ (Condition 96).

IX. EMISSION UNIT APPLICABLE REQUIREMENTS - Woodworking Requirements - (3-E1, 501-E2, 513-E1)

Limitations

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

9 VAC 5-40-2270	Emission Standards for Woodworking Operations - Standard for Particulate Matter (Rule 4-17)
9 VAC 5-40-2280	Emission Standards for Woodworking Operations - Standard for Visible Emissions (Rule 4-17)

The applicable requirements from Rule 4-17 are included in the table at the beginning of Section IX.A and Condition 98.

Monitoring

Periodic monitoring requirements which meet the requirements of Part 70 are outlined in Conditions 99 and 100.

Condition 99 requires the source to perform monthly visible emissions evaluations in accordance with EPA Method 9 on each woodworking operation exhaust to determine compliance with the opacity limit. The source is required to maintain records of VEEs in accordance with EPA Method 9.

Condition 100 requires the source to perform monthly inspections on each cyclone for each woodworking operation to ensure structural integrity. The source is required to maintain a logbook of the inspection results.

The VEE condition has been revised for clarity. This condition requires that the source perform monthly visible emissions evaluations (VEE) in accordance with EPA Method 9, but the language in previous versions of the condition incorrectly indicated that a visual emissions observation was also required. The language regarding visible emissions observations has been removed.

Recordkeeping

Condition 101 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Visible emission evaluations (VEE) records in accordance with Method 9 (40 CFR 60 Appendix B).
- b. All cyclone structural integrity evaluations.

As a result of the clarification to the monitoring requirements in Condition 99 (please see above), the corresponding recordkeeping requirements have also been revised to reference only the required visible emissions evaluations, not visible emissions observations.

Testing

If testing is conducted in addition to the monitoring specified in the permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ (Condition 102).

X. EMISSION UNIT APPLICABLE REQUIREMENTS - Flame Spray Facility and Powder Coating Operation Requirements - (4701-E10 through E13, 105-C1a through c, 205-C3, and 206-C1)

Limitations

The following limitations are derived from the New Source Review permit issued February 12, 1986:

Condition 104 (NSR Specific Condition 4): Process Emission Limits

The following limitations are derived from the New Source Review permit issued September 2, 2011:

Condition 103 (NSR Conditions 10 and 11): Process Emission Limits and Visible Emission Limit

Condition 105 (NSR Condition 4): Emission Controls

Condition 106 (NSR Condition 5): Emission Controls

Condition 107 (NSR Condition 8): Fuel Throughput

Condition 108 (NSR Condition 9): Fuel Throughput

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

9 VAC 5-50-260 BACT Standard for New and Modified Stationary Sources

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)

Note: The minor clarifications made to Conditions 106 and 110 in the May 29, 2012 Title V permit have been carried over, as follows:

Condition 106: The September 2, 2011 minor NSR permit requires that the source use “non-volatile” cleaning solutions in parts washer 205-C1. This reference to “non-volatile” has been changed to “water-based” for clarity.

Condition 110: The September 2, 2011 minor NSR permit states the following: “To ensure good performance, the device used to continuously measure temperature inside the direct flame afterburner chamber shall be observed by the permittee once per operation.” The source interpreted this to mean that they were required to visually inspect the thermocouple inside the direct flame afterburner during each operation, which is not feasible. The condition has been revised to clarify that the intent of the condition is to monitor the temperature readings given by the monitoring device, not the monitoring device itself.

Monitoring

The monitoring requirements from the September 2, 2011 NSR permit are included in Conditions 109 and 110 (NSR Conditions 6 and 7).

Additional periodic monitoring requirements which meet the requirements of Part 70 are included in Condition 111. This condition requires that the source perform monthly visible emissions observations on each burner/oven stack of the powder coating operation. 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. The source is required to maintain records of all visible emissions observations/VEEs.

Recordkeeping

The recordkeeping requirements from the February 12, 1986 NSR permit for the flame spray operation are included in Condition 112 (NSR Specific Condition 5).

The recordkeeping requirements from the September 2, 2011 NSR Permit for the natural gas and propane-fired units in the powder coating operation are included in Condition 113. These records include:

- a. Annual throughput of natural gas (in cubic feet), 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. Annual throughput of liquid propane gas (in gallons), 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. Records of the afterburner temperature when the heat cleaning oven (Unit Ref. No. 206-C1) is in operation (circle or strip chart).
- d. Records of all visible emissions observations.

Note: While the natural gas and propane-fired units in the powder coating operation are included in this section, the Nordson powder coating booth itself is listed in the insignificant emission unit list.

Testing

The emissions testing requirements from the September 2, 2011 NSR permit are included in Condition 114 (NSR Condition 13).

XI. EMISSION UNIT APPLICABLE REQUIREMENTS - Satellite Blast and Coat Facility Requirements - (SBF-E1 and SPF-E1)

Limitations

The following limitations are derived from the New Source Review permit issued June 7, 2010:

- Condition 115 (NSR Conditions 10, 11, and 12): Process Emission Limits and Visible Emission Limits
- Condition 116 (NSR Condition 3): Emission Controls
- Condition 117 (NSR Condition 4): Emission Controls
- Condition 118 (NSR Condition 7): Throughput
- Condition 119 (NSR Condition 8): Throughput
- Condition 120 (NSR Condition 9): Requirements by Reference

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

- 9 VAC 5-50-260 BACT Standard for New and Modified Stationary Sources

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)

Monitoring

The monitoring requirements from the June 7, 2010 NSR Permit are included in Conditions 121, 122, and 123 (NSR Conditions 5, 6, and 13).

Recordkeeping

Condition 124 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Annual throughput of abrasive blasting media in tons, 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. Annual throughput of marine coating in gallons, 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. Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS), or other vendor information as approved by DEQ showing the VOC content and solids content for each coating used.

- d. Monthly and annual emissions calculations for VOC from the process stacks using calculation methods approved by the Director, Tidewater Regional Office to verify compliance with the tons/yr emissions limitation in Table XI.A. Annual emissions 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.
- e. Monitoring records for the air pollution control device, as required in Condition 122.
- f. Visible emission observation records and any corrective action taken, as required in Condition 123.

XII. EMISSION UNIT APPLICABLE REQUIREMENTS - Blast and Coat Facility West (4730-SBCF-E1, 4730-SBCF-E2, and 4730-SBCF-E3)

Limitations

The following limitations are derived from the New Source Review permit issued November 17, 2014:

- Condition 125 (NSR Conditions 11 and 12): Process Emission Limits and Visible Emission Limits
- Condition 126 (NSR Condition 3): Emission Controls
- Condition 127 (NSR Condition 5): Emission Controls
- Condition 128 (NSR Condition 8): Throughput
- Condition 129 (NSR Condition 9): Throughput
- Condition 130 (NSR Condition 10): Requirements by Reference

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

- 9 VAC 5-50-260 BACT Standard for New and Modified Stationary Sources

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)

Monitoring

The monitoring requirements from the November 17, 2014 NSR permit are included in Conditions 131 through 134 (NSR Conditions 4, 6, 7, and 13).

Recordkeeping

Condition 135 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Annual throughput of abrasive blast media through the abrasive blasting process (Unit Ref. No. 4730-SBCF-E1) (in tons), 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. Annual throughput of marine coating through the marine coating process (Unit Ref. No. 4730-SBCF-E2 and 4730-SBCF-E3) (in gallons), 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. Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS), **or** other vendor information as approved by DEQ showing the VOC content and solids content for each coating used.

- d. Monthly and annual emissions calculations for VOC from the spray coating process stacks (Unit Ref. Nos. 4730-SBCF-E2 and 4730-SBCF-E3) using calculation methods approved by the Director, Tidewater Regional Office to verify compliance with the tons/yr emission limitation in Table XII.A. Annual emissions 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.
- e. Fugitive emissions observation records and any corrective action taken, as required in Condition 131.
- f. Control device monitoring records for the air pollution control devices, as required in Condition 133.
- g. Visible emissions observation records and any corrective action taken, as required in Condition 134.

XIII. EMISSION UNIT APPLICABLE REQUIREMENTS - Shipyard MACT Requirements (See table in Section XIII of Title V permit for Emission Unit ID's)

Limitations

The following Code of Federal Regulations has specific emission requirements that have 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 the table at the beginning of Section XIII and Condition 136.

Monitoring and Recordkeeping

The applicable monitoring and recordkeeping requirements from MACT II are included in Conditions 137 through 140.

Condition 138 has been updated to reflect the dates of the revised Shipyard MACT Implementation Plan. This plan was submitted to DEQ on January 17, 2013 and approved on February 4, 2013.

Testing

The applicable testing requirements from MACT II are included in Conditions 141.

If testing is conducted in addition to the monitoring specified in the permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ (Condition 142).

Reporting

The applicable reporting requirements from MACT II are included in Condition 143.

XIV. EMISSION UNIT APPLICABLE REQUIREMENTS - Specialty Shops Requirements (See table in Section XIV of Title V permit for Emission Unit ID's)

Limitations

The following limitations are derived from the New Source Review permit issued October 18, 1979:

- Condition 144 (NSR Condition 2): Process Emission Limits
- Condition 145 (NSR Permit): Emission Controls
- Condition 146 (NSR Condition 6): Fuel

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

- | | |
|-----------------|---|
| 9 VAC 5-40-260 | Emission Standards for General Process Operations - Standard for Particulate Matter (Rule 4-4) |
| 9 VAC 5-40-80 | Standard for Visible Emissions for Existing Stationary Sources |
| 9 VAC 5-50-80 | Standard for Visible Emissions for New and Modified Stationary Sources |
| 9 VAC 5-40-3280 | Emission Standards for Solvent Metal Cleaning Operations Using Non-Halogenated Solvents - Standard for Volatile Organic Compounds (Rule 4-24) |
| 9 VAC 5-40-20 F | Compliance Requirements for Existing Stationary Sources - VOC Disposal Requirements |

The applicable limitations and operating requirements from Rule 4-24 are included in the table at the beginning of Section XIV.A and Conditions 147 and 148.

The VOC disposal requirements from 9 VAC 5-40-20 F are included in Condition 149.

Monitoring

Periodic monitoring requirements which meet the requirements of Part 70 are included in Condition 150. This condition requires that the source perform monthly visible emissions observations on each unit of the Specialty Shop operations, except for the parts washers. 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. The source is required to maintain records of all visible emissions observations/VEEs.

The applicable monitoring requirements from Rule 4-24 are included in Condition 151. The source is required to inspect each parts washer once per calendar year to ensure compliance with the control requirements in 9 VAC 5-40-3290 C.

Recordkeeping

Condition 152 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Records of visible emissions observations and visible emission evaluations (VEE), if performed,
- b. Records of waste solvent disposal, and
- c. Records of parts-washer inspections and corrective actions taken.

Testing

If testing is conducted in addition to the monitoring specified in the permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ (Condition 153).

XV. EMISSION UNIT APPLICABLE REQUIREMENTS - Miscellaneous Activities Requirements (See table in Section XV of Title V permit for Emission Unit ID's)

Limitations

The following limitations are derived from the New Source Review permit issued September 2, 2011:

Condition 154 (NSR Condition 2): Process Emission Limits

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

9 VAC 5-50-80	Standard for Visible Emissions for New and Modified Stationary Sources
9 VAC 5-40-80	Standard for Visible Emissions for Existing Stationary Sources
9 VAC 5-40-260	Emission Standards for General Process Operations - Standard for Particulate Matter (Rule 4-4)
9 VAC 5-50-260	BACT Standard for New and Modified Stationary Sources

The following Code of Federal Regulations has specific emission requirements that have been determined to be applicable:

40 CFR 63, Subpart GGGGG	National Emission Standards for Hazardous Air Pollutants: Site Remediation
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Monitoring

Periodic monitoring requirements which meet the requirements of Part 70 are included in Conditions 157 and 158.

Condition 157 requires that the source perform weekly visible emission observations on the stack/vent of each powder coating steel shot blast unit. 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 visible emissions observations.

Condition 158 requires that the source perform monthly visible emissions observations on each unit in the Miscellaneous Activities operations which vent to the atmosphere, except for the powder coating steel shot blast units. 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. The source is required to maintain records of all visible emissions observations/VEEs.

The applicable monitoring requirements from MACT GGGGG are included in Condition 159.

Recordkeeping

Condition 160 includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- d. Records of visible emissions observations, any corrective action taken, and visible emission evaluations using EPA Method 9 (reference 40 CFR 60, Appendix A), if performed.
- e. Records of written documentation to support the determination that the total HAP quantity in the remediation materials is less than 1 megagram per year from all remediation activities at your facility as required by 40 CFR 63.7881(c)(2) to qualify for exemption from the requirements of 40 CFR 63 Subpart GGGGG. The documentation must include a description of your methodology and data used for determining the total HAP content of the remediation material.

Testing

If testing is conducted in addition to the monitoring specified in the permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ (Condition 161).

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 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

165-170. 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 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9 VAC 5-80-80	Application
9 VAC 5-80-140	Permit Shield
9 VAC 5-80-150	Action on Permit Applications

176. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 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 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

This general condition cites the sections that follow:

9 VAC 5-40-41	Emissions Monitoring Procedures for Existing Sources
9 VAC 5-40-50	Notification, Records and Reporting
9 VAC 5-50-50	Notification, Records and Reporting

180. Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50	Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190	Changes to Permits
9 VAC 5-80-260	Enforcement
9 VAC 5-80-1100	Applicability, Permits For New and Modified Stationary Sources

9 VAC 5-80-1605	Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000	Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

194-197. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Conditions 194-197 and General Condition 176. For further explanation see the comments on General Condition 176.

These general conditions cite the sections that follow:

9 VAC 5-20-180	Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110	Permit Content

201. 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, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to demolition and renovation
40 CFR 61.148, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to insulating materials
40 CFR 61.150, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to waste disposal

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70	Designated Emissions Standards
9 VAC 5-80-110	Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

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

- 9 VAC 5, Chapter 40, Part II, Article 2: Existing Source Standards for Odor (Rule 4-2)
- 9 VAC 5, Chapter 60, Part II, Article 4: Existing Source Standards for Toxic Pollutants (Rule 6-4)
- 9 VAC 5, Chapter 50, Part II, Article 2: New and Modified Source Standards for Odor (Rule 5-2)
- 9 VAC 5, 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 60 Subpart AA	Standards of Performance for Steel Plants: Electric Arc Furnaces Constructed After October 21, 1974, and On or Before August 17, 1983	The Electric Arc Furnaces were installed prior to the applicability date for this NSPS (installed ca. 1950).
40 CFR 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification commenced after July 23, 1984	VOL storage tanks, capacity 20,000 to < 40,000 gal with maximum true vapor pressure ≥ 15 kPa (2.16 psi), and capacity $\geq 40,000$ gal with maximum true vapor pressure ≥ 3.5 kPa (0.5 psi). Facility's tanks with the cited capacities have maximum true vapor pressure less than the cited thresholds.
40 CFR 60 Subpart CCCC	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units	The source does not operate any equipment meeting the definition of "commercial and industrial solid waste incineration (CISWI) unit" under this subpart.
40 CFR 60 Subpart DDDD	Emission Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units	The source does not operate any equipment meeting the definition of "commercial and industrial solid waste incineration (CISWI) unit" under this subpart.
40 CFR 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI ICE)	All of the facility's SI ICE are portable (nonroad engines) and, therefore, are not subject to this regulation.
40 CFR 61 Subpart C	National Emission Standards for Beryllium	The foundry and machine shops do not process beryllium products.
40 CFR 61 Subpart H	National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities	The source is not an applicable source under this subpart. It is not owned or operated by the Department of Energy.

Citation	Title of Citation	Description of Applicability
40 CFR 61 Subpart I	National Emission Standards for Radionuclide Emissions from Federal Facilities Other Than Nuclear Regulatory Commission Licensees and Not Covered by Subpart H	The source is not an applicable source under this subpart. It is not owned or operated by the Department of Energy.
40 CFR 63 Subpart N	National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	The chromium electroplating process is permanently shutdown. The source is no longer subject to this subpart.
40 CFR 63 Subpart R	National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)	The source does not meet the definition of "bulk gasoline terminal" or "pipeline breakout station" under this subpart.
40 CFR 63 Subpart T	National Emission Standards for Halogenated Solvent Cleaning	Solvent cleaning machines containing certain halogenated solvents which are not used at the facility.
40 CFR 63 Subpart X	National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting	This subpart applies to secondary lead smelters using lead-bearing scrap metals. The source uses pure lead ingots.
40 CFR 63 Subpart KK	National Emission Standards for the Printing and Publishing Industry	The source does not operate any publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing processes which would be subject to this subpart.
40 CFR 63 Subpart VVVV	National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing	The source does not meet the definition of "boat manufacturing facility" under this subpart.
40 CFR 63 Subpart WWWW	National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production	The source does not meet the definition of "reinforced plastic composites production facility" under this subpart.
40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Only with respect to Emission Units FTSF-E1 and FTSF-E2 by action of §63.7491(c).

Citation	Title of Citation	Description of Applicability
40 CFR 63 Subpart BBBBBB	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	The source is not an area source of HAP, nor does it meet the definition of "gasoline distribution bulk terminal," "bulk plant," or "pipeline facility" under this subpart.
40 CFR 63 Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	The source is not an area source of HAP.
9 VAC 5-40-3410 et seq. (Rule 4-25)	Emission Standards For Volatile Organic Compound Storage and Transfer Operations	Non-petroleum liquid storage tanks, 40,000 gal capacity or larger, located in a VOC control area (9 VAC 5-20-206). The facility's larger tanks contain petroleum liquids.
9 VAC 5-40-4760 et seq. (Rule 4-34)	Emission Standards For Miscellaneous Metal Parts and Products Coating Application Systems	The source received a determination from DEQ on August 22, 1997 stating that it is not subject to Rule 4-34 for the coating of received metal plates used to build new ships. The rule is intended for operations that involve the coating of miscellaneous parts in the manufacturing or assembly of a product. The source does not use the received metal plates to manufacture the end product at the time of the coating operation; the plates are coated at the time of delivery to provide pre-assembly protection against the elements for an extended period of storage and for later use in the construction of new ships.

Huntington Ingalls Incorporated (aka Newport News Shipbuilding) 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 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
4620-EPT	Electroplating tanks in Bldg 4620	9VAC5-80-720B	Metallic oxides and non-HAP inorganic acids, alkalis, and salts	N/A
509-E1	Natural gas-fired hot water boiler	9VAC5-80-720C	N/A	0.48 MMBtu/hr
4619-E1	Sludge dryer - electric	9VAC5-80-720B	N/A	N/A
HEATERS-SPACE	Space heaters for comfort heating located throughout the shipyard, stationary and portable	9VAC5-80-720A	N/A	N/A
205-PDR	Nordson Powder Booth - powder coating booth in Bldg 205 (closed loop system with no exhaust to the atmosphere)	9VAC5-80-720B	PM	N/A
PORTENG-CI	All portable Compression Ignition engine (non-road) driven equipment	Not stationary sources	N/A	1-127 hp
PORTENG-SI	All portable Spark Ignition engine (non-road) driven equipment	Not stationary sources	N/A	1-20 hp
29-PT	Pickling Tank, 6,400 gal	9VAC5-80-720B	H ₂ SO ₄	N/A
161-PT	Four Pickling Tanks, each 3,240 gal	9VAC5-80-720B	H ₂ SO ₄	N/A
5664 / 4677-SHT	Special Hull Treatment	9VAC5-80-720B	VOC	N/A
BLDG-VENTS	General ventilation exhausts from shipyard buildings (fugitive and small tool/machine local ventilation emissions)	9VAC5-80-720B	PM, VOC	N/A
518-E1	Nitrogen/Oxygen Cylinder Purge & Clean Operation	9VAC5-80-720B	TCE, VOC	N/A
550-E10	Abrasive Saw, #5453	9VAC5-80-720B	PM	N/A
5-E1	Metal grinder, 0.1 Lb/Hr	9VAC5-80-720B	PM	N/A
A210	Diesel Tank, 1,000 gallons	9VAC5-80-720B	VOC	N/A
A211	Diesel Tank, 180 gallons	9VAC5-80-720B	VOC	N/A
A213	Diesel Tank on the Floating Dry Dock Vessel, 1,600 gallons	9VAC5-80-720B	VOC	N/A

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
A214	Diesel Tank on the Floating Dry Dock Vessel, 8,000 gallons	9VAC5-80-720B	VOC	N/A
A215	Diesel Tank on the Floating Dry Dock Vessel, 570 gallons	9VAC5-80-720B	VOC	N/A
A216	Diesel Tank on the Floating Dry Dock Vessel, 800 gallons	9VAC5-80-720B	VOC	N/A
A217	Diesel Tank on the Floating Dry Dock Vessel, 570 gallons	9VAC5-80-720B	VOC	N/A
A218	Diesel Tank, 3,000 gallons	9VAC5-80-720B	VOC	N/A
A219	Diesel Tank, 1,000 gallons	9VAC5-80-720B	VOC	N/A
A220	Diesel Tank, 2,200 gallons	9VAC5-80-720B	VOC	N/A
A221	Diesel Tank, 1,000 gallons	9VAC5-80-720B	VOC	N/A
A222	Diesel Tank, 1,500 gallons	9VAC5-80-720B	VOC	N/A
A223	Diesel Tank, 4,000 gallons	9VAC5-80-720B	VOC	N/A
A224	Diesel Tank, 1,000 gallons	9VAC5-80-720B	VOC	N/A
A225	Diesel Tank, 8,000 gallons	9VAC5-80-720B	VOC	N/A
A226	Diesel Tank, 6,000 gallons	9VAC5-80-720B	VOC	N/A
A227	Diesel Tank, 633 gallons	9VAC5-80-720B	VOC	N/A
A229	Diesel Tank, 300 gallons	9VAC5-80-720B	VOC	N/A
A230	Diesel Tank, 270 gallons	9VAC5-80-720B	VOC	N/A
A231	Diesel Tank, 250 gallons	9VAC5-80-720B	VOC	N/A
A232	Diesel Tank, 700 gallons	9VAC5-80-720B	VOC	N/A
A233	Diesel Tank, 329 gallons	9VAC5-80-720B	VOC	N/A
A234	Diesel Tank, 200 gallons	9VAC5-80-720B	VOC	N/A
A301	Recycled Oil Tank, 39,194 gallons	9VAC5-80-720B	VOC	N/A
A302	Recycled Oil Tank, 39,194 gallons	9VAC5-80-720B	VOC	N/A
A401	Wastewater Tank, 66,975 gallons	9VAC5-80-720B	VOC	N/A
A402	Oily Waste Tank, 66,973 gallons	9VAC5-80-720B	VOC	N/A
A403	Waste Tank, 8,300 gallons	9VAC5-80-720B	VOC	N/A
A404	Wastewater Tank, 10,000 gallons	9VAC5-80-720B	VOC	N/A
A405	Wastewater Tank, 25,000 gallons	9VAC5-80-720B	VOC	N/A
A407	Wastewater Tank, 2,000 gallons	9VAC5-80-720B	VOC	N/A
A408	Oily Wastewater Tank, 1,000 gallons	9VAC5-80-720B	VOC	N/A

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
A409	Oily Wastewater Tank, 1,000 gallons	9VAC5-80-720B	VOC	N/A
A411	Lead Wastewater Tank, 5,000 gallons	9VAC5-80-720B	VOC	N/A
A412	Oily Wastewater Tank, 8,300 gallons	9VAC5-80-720B	VOC	N/A
A413	Oily Wastewater Tank, 8,300 gallons	9VAC5-80-720B	VOC	N/A
A414	Wastewater Tank, 6,000 gallons	9VAC5-80-720B	VOC	N/A
A415	Wastewater Tank, 2,000 gallons	9VAC5-80-720B	VOC	N/A
A416	Wastewater Tank, 10,012 gallons	9VAC5-80-720B	VOC	N/A
A417	Wastewater Tank, 275 gallons	9VAC5-80-720B	VOC	N/A
A418	Wastewater Tank, 275 gallons	9VAC5-80-720B	VOC	N/A
A419	Wastewater Tank, 225 gallons	9VAC5-80-720B	VOC	N/A
A420	Wastewater Tank, 225 gallons	9VAC5-80-720B	VOC	N/A
A421	Wastewater Tank, 1,000 gallons	9VAC5-80-720B	VOC	N/A
A508	Diesel Tank, 530 gallons	9VAC5-80-720B	VOC	N/A
A509	Diesel Tank, 530 gallons	9VAC5-80-720B	VOC	N/A
A510	Diesel Tank, 530 gallons	9VAC5-80-720B	VOC	N/A
A511	Diesel Tank, 270 gallons	9VAC5-80-720B	VOC	N/A
A512	Diesel Tank, 270 gallons	9VAC5-80-720B	VOC	N/A
A513	Diesel Tank, 270 gallons	9VAC5-80-720B	VOC	N/A
A514	Jet-Fuel Tank (JP-5), 2,000 gallons	9VAC5-80-720B	VOC	N/A
A515	Jet-Fuel Tank (JP-5), 2,310 gallons	9VAC5-80-720B	VOC	N/A
A516	Jet-Fuel Tank (JP-5), 2,310 gallons	9VAC5-80-720B	VOC	N/A
A601	Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A602	Oily Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A603	Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A604	Oily Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A605	Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A606	Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A607	Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A608	Oily Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A609	Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A610	Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A611	Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
A612	Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A613	Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A614	Oily Wastewater, 910 gallons	9VAC5-80-720B	VOC	N/A
A615	Wastewater Tank, 910 gallons	9VAC5-80-720B	VOC	N/A
A617	Oily Wastewater Tank	9VAC5-80-720B	VOC	N/A
A701	Waste Oil Tank, 532 gallons	9VAC5-80-720B	VOC	N/A
A702	Used Waste Oil Tank	9VAC5-80-720C	N/A	225 gallons
A703	Used Waste Oil Tank	9VAC5-80-720C	N/A	185 gallons
A704	Used Waste Oil Tank	9VAC5-80-720C	N/A	519 gallons
A801	Motor Oil Tank, 500 gallons	9VAC5-80-720B	VOC	N/A
A802	Motor Oil Tank, 500 gallons	9VAC5-80-720B	VOC	N/A
A803	Motor Oil Tank, 500 gallons	9VAC5-80-720B	VOC	N/A
A804	Hydraulic Oil Tank, 500 gallons	9VAC5-80-720B	VOC	N/A
A805	Hydraulic Oil Tank 500 gallons	9VAC5-80-720B	VOC	N/A
A806	Transmission Fluid Tank, 500 gallons	9VAC5-80-720B	VOC	N/A
A901	No. 6. Fuel Oil Tank, 93,744 gallons	9VAC5-80-720B	VOC	N/A
A902	No. 6 Fuel Oil Tank, 93, 744 gallons	9VAC5-80-720B	VOC	N/A
A903	No. 6 Fuel Oil Tank, 60,303 gallons	9VAC5-80-720B	VOC	N/A
A904	No. 6 Fuel Oil Tank, 60,303 gallons	9VAC5-80-720B	VOC	N/A
A905	No. 6 Fuel Oil Tank, 124,059 gallons	9VAC5-80-720B	VOC	N/A
A906	No. 6 Fuel Oil Tank, 124,059 gallons	9VAC5-80-720B	VOC	N/A
NL706	Diesel Tank on the Nancy Lee vessel, 500 gallons	9VAC5-80-720B	VOC	N/A
NL707	Oily Waste Tank on the Nancy Lee vessel, 10,000 gallons	9VAC5-80-720B	VOC	N/A
U232	Diesel Tank, 1,000 gallons	9VAC5-80-720B	VOC	N/A
U306	Gasoline Tank, 10,000 gallons	9VAC5-80-720B	VOC	N/A
U503	No. 6 Oil Tank, Powerhouse, 521,304 gallons	9VAC5-80-720B	VOC	N/A
U504	No. 6 Oil Tank, B1744, 171,400 gallons	9VAC5-80-720B	VOC	N/A
U505	No. 6 Oil Tank, B1744, 171,400 gallons	9VAC5-80-720B	VOC	N/A
U508	No. 6 Oil Tank, 10,000 gallons	9VAC5-80-720B	VOC	N/A
U510	Oily Water Tank, 500 gallons	9VAC5-80-720B	VOC	N/A

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
U511	Oily Water Tank, 48,000 gallons	9VAC5-80-720B	VOC	N/A
U512	Oily Water Tank, 20,000 gallons	9VAC5-80-720B	VOC	N/A
U513	Oily Water Tank, 20,000 gallons	9VAC5-80-720B	VOC	N/A
U514	Oily Water Tank, 30,000 gallons	9VAC5-80-720B	VOC	N/A
U600	Car Wash Tank, 8,000 gallons	9VAC5-80-720B	VOC	8,000 gallons
SG401-424	Aqueous Cleaning Chemicals Tanks, 18,000 gallons each	9VAC5-80-720B	none	N/A
SG425	H ₂ O ₂ Tank, 2,000 gallons	9VAC5-80-720B	none	N/A
SG426	Overflow Tank, 1,200 gallons	9VAC5-80-720B	none	N/A
SG427	NH ₄ OH Tank, 2,400 gallons	9VAC5-80-720B	ammonia	N/A
SG428	Overflow Tank, 250 gallons	9VAC5-80-720B	ammonia	N/A
SG429-431	Aqueous Cleaning Chemicals Tanks, 6,000 gallons each	9VAC5-80-720B	none	N/A
SG432	Aqueous Cleaning Chemicals Tank, 9,000 gallons	9VAC5-80-720B	none	N/A
SG433-434	Aqueous Cleaning Chemicals Tanks, 18,000 gallons each	9VAC5-80-720B	none	N/A
SG435-438	Aqueous Cleaning Chemicals Tanks, 4,000 gallons each	9VAC5-80-720B	none	N/A
SG439-440	Overflow Tanks, 1,250 gallons each	9VAC5-80-720B	none	N/A
SG441	Overflow Tanks, 250 gallons each	9VAC5-80-720B	none	N/A
SG442	Overflow Tanks, 100 gallons each	9VAC5-80-720B	none	N/A
SG443-446	Phosphate Water Tanks, 18,000 gallons each	9VAC5-80-720B	none	N/A
SG447-449	Portable PO ₄ Water Tanks, 18,000 gallons each	9VAC5-80-720B	none	N/A
SG452	DI/DEOX Water/Chilled Water Tank, 22,500 gal	9VAC5-80-720B	none	N/A
SG453-455	DI/DEOX Water Tanks, 18,000 gallons each	9VAC5-80-720B	none	N/A
SG456	Underfloor Collection Tank, 1,000 gallons	9VAC5-80-720B	none	N/A
SG457	Dead Leg Collection Tank, 250 gallons	9VAC5-80-720B	none	N/A
SG458	Bleed Tank, 18,000 gallons	9VAC5-80-720B	none	N/A
NL700	No. 6 Oil Tank on the Nancy Lee vessel, 124,203 gallons	9VAC5-80-720B	VOC	N/A
NL701	No. 6 Oil Tank on the Nancy Lee vessel, 124,203 gallons	9VAC5-80-720B	VOC	N/A
NL702	No. 6 Oil Tank on the Nancy Lee vessel, 93,884 gallons	9VAC5-80-720B	VOC	N/A

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
NL703	No. 6 Oil Tank on the Nancy Lee vessel, 93,884 gallons	9VAC5-80-720B	VOC	N/A
NL704	No. 6 Oil Tank on the Nancy Lee vessel, 60,373 gallons	9VAC5-80-720B	VOC	N/A
NL705	No. 6 Oil Tank on the Nancy Lee vessel, 60,373 gallons	9VAC5-80-720B	VOC	N/A
T2B	Treated Water Tank, 60,000 gallons	9VAC5-80-720B	None	N/A
T2A	Treated Water Tank, 60,000 gallons	9VAC5-80-720B	None	N/A
T4138	Treated Water Tank, 60,000 gallons	9VAC5-80-720B	None	N/A
PT-OW	Portable Oily Wastewater Tanks (totes), 900 gallons	9VAC5-80-720B	VOC	N/A
PT-NOW	Portable Non-Oily Wastewater Tanks (totes), various < 900 gallons	9VAC5-80-720B	none	N/A

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

Changes to the Insignificant Emission Unit list:

Units 550-E6, 550-E15, 274-E2 through 274-E11, 275-E1 through E3, 276-E5, 60-E4, 4702-EF2, 550-E22, and 4681-E1 have been moved to the list of significant emission units. These process heaters are now subject to the requirements of 40 CFR 63, Subpart DDDDD (Major Source Boiler MACT).

Units 521-E1, 521-E2, 521-E3, 521-E4, 521-E5, 1877-E1, 1796-E1, 4678-E1, 4678-E2, and 4678-E3 have also been moved to the list of significant emission units. These hot water boilers are rated at greater than 1.6 MMBtu/hr and are, therefore, subject to the requirements of 40 CFR 63, Subpart DDDDD (Major Source Boiler MACT).

The list of natural gas-fired hot water heaters has been updated to reflect all units at the facility. Some previously listed units have been re-named or replaced.

The space heaters have been combined under one reference number: HEATERS-SPACE.

Units 1746-E2, 1746-E3, 17-E2, 4740-E1, 907-E1, 1833-E1, and 4698-E1 have been removed. These units no longer exist at the facility.

Unit 276-CNC has been removed. The CNC cutting machines have no exterior exhaust to the atmosphere and, therefore, are not regulated emission units.

Units 1865-CMAF and 1872-CMOF have been removed. These reference numbers are designators for entire buildings, not individual emission units.

All portable compression ignition engine-driven equipment (generators, pumps, compressors, etc.) have been combined under one reference number: PORTENG-CI.

All portable spark ignition engine-driven equipment (generators, pumps, compressors, etc.) have been combined under one reference number: PORTENG-SI.

All of the electroplating tanks have been combined under one reference number: 4620-EPT (Note: chromium electroplating is no longer performed at the facility).

Unit 550-E10 has been moved to the list of insignificant emission units. It was previously determined that this operation has a PM PTE less than 5 tons/yr.

Tanks A212 and A410 have been removed. These tanks are no longer at the facility.

Tanks A227 through A234 have been added.

Tanks A415 through A421 have been added.

Tanks A601-A615 have been separated to clarify which tanks are wastewater tanks and which are oily wastewater tanks.

Tanks A617 and A701 have been added.

Tanks A703 and A704 have been added.

Tanks A801 through A806 have been added.

Tanks A901 through A906 have been added.

Tanks T2B, T2A, T4138, PT-OW, and PT-NOW have been added.

The equipment descriptions and rated capacities of many of the storage tanks have been updated to reflect the current operations at the facility.

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 Title V renewal permit was placed on public notice in the **Daily Press** newspaper from **Friday, March 13, 2015** to **Monday, April 13, 2015**.

No additional public participation is required for this administrative amendment.