

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
FIELD OPERATIONS - BUREAU OF AIR QUALITY

OPERATING PERMIT

In accordance with provisions of the Air Pollution Control Act, the act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the Rules and Regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below:

<b>Permit No.</b>	<u>OP-46-0079</u>	<b>Source(s)</b>	<u>Facility VOC and NOx RACT</u>
<b>Owner</b>	<u>Naval Air Station Joint Reserve Base</u>	<b>Air</b>	<u></u>
<b>Address</b>	<u>Willow Grove</u>	<b>Cleaning</b>	<u></u>
	<u>Code 89</u>	<b>Device</b>	<u></u>
	<u>Environmental Division</u>		
	<u>Willow Grove, PA 19090-5021</u>		
<b>Attention</b>	<u>Ms. Gloria Abarca</u>	<b>Location</b>	<u>Horsham Township</u>
	<u>Environmental Scientist</u>		<u>Montgomery County</u>

This permit is subject to the following conditions:

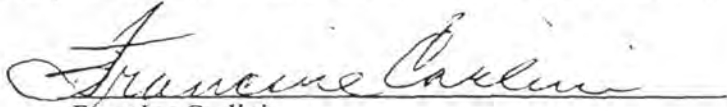
1. That the source(s) and any associated air cleaning devices are to be:
  - a. operated in such a manner as not to cause air pollution;
  - b. in compliance with the specifications and conditions of any applicable plan approval issued;
  - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

(SEE ADDITIONAL CONDITIONS ATTACHED)

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the Rules and Regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued 05/04/1998

~~Expires~~ 05/04/2003

  
Francine Carlini  
Regional Manager  
Air Quality

cc: Division of Permits, RCSOB  
Administration  
SEFO  
Re (RN)253-14

**OPERATING PERMIT CONDITIONS**  
**PERMIT NO. OP-46-0079**  
**NAVAL AIR STATION JOINT RESERVE BASE**

**CONDITIONS (continued):**

3. This RACT Operating Permit includes Reasonably Available Control Technology (RACT) determinations as required by Title I provisions of the CAAA, and, 25 Pa. Code Sections 129.91 through 129.95 for:

Case by case

**Volatile Organic Compound (VOC) sources:**

- a. Aerospace surface coating processes in Buildings 80, 175, 180, 635, and 680.
- b. Miscellaneous cleaning operations in Buildings 13, 78, 80, 175, 180, 630, PAR and ROF sites.

**Nitrogen Oxides (NO<sub>x</sub>) sources:**

- c. Jet Engine Test Areas/ Accessory Power Unit,

and the following sources:

**VOC sources:**

- d. Paint booth processes in Building 78.
- e. Gasoline storage and dispensing in Building 127.
- f. Three (3) above ground storage tanks at the Fuel Farm.
- g. Twenty five (25) above ground storage tanks, and twenty nine (29) underground storage tanks.

**NO<sub>x</sub> Sources:**

- h. Two (2) boilers in Building 6 - DF.
- i. Sixty-four (64) natural gas fired boilers and heat pumps with heat input rates of 3 MMBtu/hr or less.
- j. Emergency generators and Fire pumps

**OPERATING PERMIT CONDITIONS**  
**PERMIT NO. OP-46-0079**  
**NAVAL AIR STATION JOINT RESERVE BASE**

**CONDITIONS (continued):**

<u>Building</u>	<u>Capacity</u>
Marines	11@60 kW
Par Site	60 kW
ROF Site	100 kW
TACAN	30 kW
6	1@280 kW, 1@146 kW, and 1@100kW
24	2 @ 165 kW, and 1@125kW
78	1@125 kW, and 1@200kW
80	60 kW
80-TWR	75 kW
118	40 kW
126	60 kW
139	100 kW
175	100 kW
178	75 kW
183	6 @ 165 kW, and 1@ 155kW
190	60 kW
608	30 kW
619	30 kW
630	60 kW
681	2 @ 246 kW, 1@355kW, and 2@ 246kW

4. VOC RACT for the sources in Conditions 3(a) and 3(b) shall consist of the following practices:
  - a. Sealing of VOC material containers while not in use and storing in lockers
  - b. Monthly emissions recordkeeping.
  - c. Aerospace surface coating processes in Buildings 80, 175, 180, and 680 shall be limited to no more than 3 lbs-VOC/hour, 15 lbs-VOC/day, and 2.7 tons VOC/year on a 12 month rolling average basis.
  
5. NO<sub>x</sub> RACT for Jet Engine Test Areas/Accessory Power Unit shall be maintenance and operation in accordance with manufacturer's specifications and good air pollution control practices.
  
6. NO<sub>x</sub> and VOC emissions from each Jet Engine Test Area/Accessory Power Unit shall not individually exceed 3 tons per year on a 12 month rolling average basis.
  
7. VOC RACT for the source in Condition 3(d) shall be compliance with 25 Pa. Code Section 129.52.
  
8. VOC RACT for the sources in Condition 3(e) shall be compliance with 25 Pa. Code Sections 129.61, 129.62, and 129.82.

OPERATING PERMIT CONDITION  
PERMIT NO. OP-46-0079  
NAVAL AIR STATION JOINT RESERVE BASE

CONDITIONS (continued):

9. NO<sub>x</sub> RACT for the sources in Condition 3(h) shall be compliance with the annual tune up requirements of 25 Pa. Code Section 129.93 (b)(2).
10. NO<sub>x</sub> RACT for the sources in 3 (i), and 3 (j) shall be compliance with 25 Pa. Code Section 129.93(c).
11. ~~All lids from drums and containers containing VOCs shall be kept closed except when the contents are being transferred.~~
12. ~~Any spills of solvents shall be cleaned up as soon as possible.~~
13. Naval Air Station shall implement an employee training program for all new and existing personnel involved in painting and cleaning operations. This training shall address the effects of VOCs on the environment, methods of reducing VOC usage, and the requirements of this operating permit. The training program will also include the following:
  1. A list of all personnel by name and job description that are required to be trained;
  2. An outline of the subjects to be covered in the initial and annual refresher training for each person, or group of personnel;
  3. Lesson plans that include appropriate application techniques and management of cleanup wastes;
  4. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
14. Naval Air Station shall maintain records in accordance with the minimum recordkeeping requirements of 25 Pa. Code Section 129.95. At a minimum, this shall include:
  - a. Records shall provide sufficient data and calculations to clearly demonstrate that the requirements of Conditions 4, 6, 7, 8, 9, 10, and 13 are met.
  - b. Data or information required to determine compliance with Condition 4 and 6 shall be recorded and maintained in a time frame consistent with the averaging period of the requirements.
  - c. Records shall be retained for at least five years and be made available to the Department upon request.

**OPERATING PERMIT CONDITIONS**  
**PERMIT NO. OP-46-0079**  
**NAVAL AIR STATION JOINT RESERVE BASE**

**CONDITIONS (continued):**

Conditions from 46-318-034

- ~~15.~~ This Operating Permit supersedes Operating Permit No. 46-318-034, issued to Willow Grove Naval Air Station in Willow Grove for the operation of a JBI Spray Booth and Systems Model No. AT32 PSB-S. Air contamination source is to be located in their Ground Support Equipment Facility (GSEF) at Governors Road, Horsham, Montgomery County.
- ~~16.~~ The paint spray process shall include the spraying of various vehicles and other miscellaneous items such as drip pans, jack stands, etc. The hours of operation shall not exceed 400 hours of operation per year.
- ~~17.~~ The paint spray booth shall not be operated unless all exhaust air passes through the two dry filter media. Each filter media shall be at least 2 inches thick.
- ~~18.~~ Sufficient standard dry filters of dimensions (20x20x2) cubic inches of the same make as the original or equivalent, approved by the Department shall be kept on hand as spares for changeouts.
- ~~19.~~ A gauge shall be installed and maintained to indicate the static pressure differential across the exhaust filters. In operation, the pressure differential shall not exceed 1.5 inches of water, to be determined when 80% of the exhaust air velocity is realized after passing through a clogged filter.
- ~~20.~~ The total quantity of coatings, thinners, reducers, additives, and cleanup solvents used in this equipment shall not exceed 250 lb of paint in any calendar month.
- ~~21.~~ The total quantity of volatile organic compound ( VOC ) emissions from the use of coatings, thinners, reducers, additives, and cleanup solvents used in this equipment shall not exceed 9.1 lbs/hr, and 1.5 tons/year.
- ~~22.~~ Particulate matter emissions from this source shall not exceed 0.23 lb/hr and 66.5 lb/year.
- ~~23.~~ The operator shall keep records to verify daily usage, VOC content, and daily emissions. Such records shall be retained in a manner approved by the Department for a minimum of two years and be made available to the Department upon request.
- ~~24.~~ Coatings, adhesives, inks, reducers, thinners, and cleanup solvents used in this equipment shall not contain any compounds identified as carcinogenic air contaminants or an air toxic as defined in the Department's Air Toxic Guidelines ( ATG ).

OPERATING PERMIT CONDITION  
PERMIT NO. OP-46-0079  
NAVAL AIR STATION JOINT RESERVE BASE

CONDITIONS (continued):

General Conditions

- ~~25.~~ The operation of the facility shall not at any time result in the emission of any air contaminants in excess of the limitations specified in, or established pursuant to any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection.
- ~~26.~~ The Naval Air Station shall within an hour of occurrence notify the Department of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection.
27. The expiration date shown on this RACT Operating Permit is for State purposes. For Federal Enforcement purposes the RACT provisions of this Operating Permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the US Environmental Protection Agency (EPA).
- ~~28.~~ If at any time the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rules and Regulations of the Department of Environmental Protection) of the aforementioned air contamination source(s), the operation and use of which is authorized by this permit, or causes, permits and allows any modifications, malfunction or removal of any air pollution control device required as a condition of this permit, then and in that event, this permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination source(s).
- ~~29.~~ The aforementioned source(s) may be operated and used only so long as any associated air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s) and the RACT application (as approved by the Department), and in accordance with any conditions set forth herein.
- ~~30.~~ If at any time it is determined that the operation of the aforementioned source(s) is causing the emission of visible air contaminants in excess of the limitations specified in Section 123.41, or malodorous air contaminants in excess of the limitations specified in Section 123.31 of Article III of the Rules and Regulations of the Department of Environmental Protection, and is causing the emission of these contaminants or any other type of air contaminant in excess of the limitations specified in this permit and specified in, or established pursuant to, any other applicable rule or regulation contained in Article III, the owner shall take immediate steps, including the installation of additional air cleaning device(s), if necessary, to reduce the air contaminant emissions to within the applicable limitations.

**OPERATING PERMIT CONDITIONS**  
**PERMIT NO. OP-46-0079**  
**NAVAL AIR STATION JOINT RESERVE BASE**

**CONDITIONS (continued):**

31. If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing required.

32. This operating permit is valid for a limited period of time and may be renewed before its expiration. Requests for an operating permit renewal must be in writing and must be accompanied by the appropriate permit application processing and annual permit administration fees as specified in Section 127.703 of the Rules and Regulations of the Department of Environmental Protection. These fees shall be paid in the form of a check payable to the "Commonwealth of Pennsylvania-Clean Air Fund." The request should be made using the appropriate application form and must be received by the Department along with a completed Air Pollution Control Act Compliance Review form no later than 60 days prior to the expiration date of this permit.

All necessary forms can be obtained from the Department upon request.

33. Any notification required as a result of any condition herein should be directed to:

Regional Air Quality Manager  
Pennsylvania Department of Environmental Protection  
Suite 6010  
Lee Park, 555 North Lane  
Conshohocken, PA 19428

Re 30 (RN)253-15

